23350 Lake Manor Drive, Chatsworth, CA 91311

Mr. Tom Glick
City Planning
City of Los Angeles

Dear Mr. Glick,

Thank you for opportunity to provide additional information and perspective with regard to the former Hughes/Raytheon (EPA ID. CAD 041 162 1240 site located at Fallbrook and Roscoe Boulevards in West Hills.

In addition to our comments on the MND, our specific concerns are three-fold:

1 First, characterization and clean-up, THEN we can discuss new plans. It is inappropriate to move ahead without a proper EIR when the facts of existing contamination are clearly a concern that has essentially gone unchecked for nearly two decades.

2. The re-zoning to manufacturing changes the screening levels as we move forward in the clean-up which is far from complete. This will have a direct impact on the resulting corrective measures that ultimately occur.

3. Changes to the Community Plan designation from "Low Density Residential" to "Manufacturing" is inappropriate without public process, as this effects the surrounding communities that may be unaware of this specific property and are unaware that it might impact them.

While clean-up "standards" may be derived from land-use rather than zoning, they are inter-related. Work-plans developed for sampling and analysis (SAP) are based on ecological risk screening levels, which ARE based on zoning. If you can't see it based on the screening level, then you don't have to clean it up. That is the battle we fight every day, on many sites through out the city. In Heal the Bay's "License to Kill[1]" issued yesterday, it discusses the top "dischargers" to the Los Angeles basin, and every one of those NPDES permits specifically discuss land zoning in the

[1] "License to Kill, The Ineffectiveness of Toxicity Testing as a Regulatory Tool in the Los Angeles Region, by Heal the Bay Authors: Charlotte Stevenson, MS; Kirsten James, MESM; Mark Gold, D. Env. http://www.healthebay.org/assets/pdfdocs/research/2009_01_07_ToxicityStudy_License-to-Kill.pdf

cleanuprocketdyne.org and acmela.org are in affiliation with International Humanities Center, a nonprofit public charitable organization exempt from federal income tax under Section 501[c](3) of the Internal Revenue Code - EIN 33-0767921 Checks may be made payable to International Humanities Center/CURO/ACME. Environmental advocacy through the arts, for proper clean up to the most protective standards for the Santa Susana Field Laboratory and other legacy aerospace sites. ACMELA.ORG is made possible through a generous grant from the Annenberg Foundation, showing their ongoing dedication to environmental advocacy and awareness. www.annenbergfoundation.org

Executive Summary. Screening tools are all based on land designation. This document specifically emphasizes the importance of understanding the results, when there is an erosion of regulation. On this site, we've had years of amnesia on regulation.

Senate Bill 990 recently passed into law by the Governor concerning the Santa Susana Field Laboratory which mandates the highest clean-up to "agricultural standards" and that is specifically because the land is zoned RA5. If it weren't for that, the fight would have been over years ago. Instead, we have a law, passed by the Governor and now, it looks like we are finally turning a corner. It is all about the zoning.

The comparison levels as illustrated on these sampling and analysis maps (included), in order to specifically demonstrate how the zoning outcome here, in the city planning stages, translates to the work in the field, and what the resulting clean-up will be.

The previous uses of the site have not been adequately characterized, as is demonstrated by this recent letter from DTSC's Phil Chandler, which is addressed to Maureen Gorsen, Director of DTSC on December 30th, 2008 (attached). Prior to any further plans for re-development, proper closure, with appropriate clean-up remedies applied and thoroughly understood prior to digging things up once again. This property has undergone several development changes over the years, each of which, have made it more difficult to determine the contaminants that may have migrated off-site. We already see evidence of this in the reports presented by Ms. Klea detailing contaminants in the nearby "Hidden Lake" residential Community as well as the known groundwater plume that has undergone partial treatment, but adequate characterization of the true nature and extent of the contamination has not been completed. This is crucial BEFORE any more decisions on zoning or otherwise, can be made.

This site has been overseen by DTSC and LARWQCB jointly, which in part, has been part of the issue with regard to this continued failure to properly characterize and clean-up the known areas of concern (AOCs) at the site. Numerous issues with previous waste tanks, sink trap and sewage line

contamination remain unresolved. We cannot continue to reward this behavior with another green-light of approval to look the other way and build again. First we need characterization and a corrective measures study BEFORE mobilizing contaminated soils and possibly exposing new workers at the site to issues of the past. Groundwater is extremely shallow, and Q conditions were ignored, by the developer, when they started with the parking garage addition.

Community Plan Change Request:

Chatsworth Porter Ranch Community plan emphasizes the community as having"equestrian horse trails" in the short summary and changing the designation of this entire community to "manufacturing" rather than "low density residential" is inappropriate without full disclosure to all the communities that are within the boundaries of the Porter Ranch/Chatsworth Community Plan as part of the General Plan for the City of Los Angeles which has been chartered through the city through the year 2010:

> "Objectives of the Plan:
> CHATSWORTH-PORTER RANCH
>
> "To encourage the preservation and enhancement of the varied and distinctive residential character of the Community."
>
> 1 To coordinate the development of the Chatsworth-Porter Ranch Community with that of other parts of the City of Los Angeles.
> 2. To designate lands in quantities and at densities, at appropriate locations, for the various private uses; and to designate the need for public facilities and the general locations thereof, as required to accommodate population and activities projected to the year 2010.
> 3. To make provisions for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.

It specifically states the purpose, of "restricting the types and intensities of industrial uses" (item 4b). If the purpose of the plan is to protect and coordinate the development of the communities that lie within those boundaries, and it is done to "designate lands in quantities and densities," then it is entirely inappropriate for a commercial developer to change those density designations when the purpose of the plan itself is to "minimize the change of land-use through the projected year of 2010." Without proper notice for a full hearing to discuss the impacts, ramifications and long term goals of these communities so that a truly informed decision can be reached by the impacted communities through public participation, not by the developer. We urge you to please deny this request, as it is in direct conflict with the wishes of the Community as detailed in this community plan.

We respectfully ask that you deny these zoning change requests until these issues can be resolved for the protection of human health and the environment, and for respecting the plan set forth by the City of Los Angeles, through the public process, for the Porter Ranch/Chatsworth Community plan through 2010 as setforth in that plan.

With sincere thanks for your time and consideration,

Christina Walsh
Cleanuprocketdyne.org, founder/director
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