



## San Fernando Valley Audubon Society

Incorporated as California Audubon Society 1913

P.O. Box 7769 Van Nuys, CA 91409-7769

*"For nature education and the conservation of wildlife"*

June 18, 2015

Anne Dove, Project Manager  
National Park Service  
Rim of the Valley Corridor Special Resources Study  
570 W. Avenue 26, #175  
Los Angeles, CA 90065

Re: National Park Service (NPS) Rim of the Valley Corridor  
Draft Special Resources Study and  
Environmental Assessment (the Study)  
Comments of San Fernando Valley Audubon Society (SFVAS)

Dear Ms. Dove:

Comments of the San Fernando Valley Audubon Society (SFVAS) on the Rim of the Valley Corridor Special Resource Study (the Study) follow.

### **Summary conclusion:**

SFVAS strongly supports expanding the Santa Monica Mountains National Recreation Area (SMMNRA) to include the boundary adjustment proposed by **Alternative D**: Regional Rim of the Valley Boundary Adjustment with Cooperative conservation Areas, with one caveat.

The one caveat is the assumption that all features of Alternative C are included in Alternative D. It appears that all features of Alternative C: Rim of the Valley Boundary Adjustment, including boundaries and all other aspects of management and operation, are included in Alternative D. However SFVAS has not done an exhaustive analysis, and there is not a blanket statement in the Executive Summary so stating. In the event there are material differences in proposed services or in areas covered by Alternative C but not by Alternative D, SFVAS would take the position supporting both Alternatives C and D.

SFVAS enthusiastically supports the inclusion of the Sepulveda Basin, Hansen Dam and environs, the Los Angeles River, the Santa Susana Field Laboratory, the Chatsworth Nature Preserve, O'Melveny Park, various sites in the Verdugo Hills, and the Upper Brown's Canyon areas within the boundaries of both Alternatives C and D of the Study, as these are all areas of special interest to us. Furthermore SFVAS fully supports the expanded area of Alternative D as

it provides the most benefit in preserving natural resources, wildlife corridors, and other benefits in our entire region.

#### **Reasons for support of alternative D:**

The NPS study strongly supports alternative D. From the Executive summary to the Study: “The alternative D boundary adjustment would add 313,000 acres to SMMNRA’s authorized boundary to connect large natural areas and promote long-term resiliency of the significant natural resources within SMMNRA and the broader study area. The boundary expansion would also provide more recreational opportunities.” The Executive Summary also concludes that alternative D is the environmentally preferable option under §101-B of the National Environmental Policy Act (NEPA). “Alternative D would best protect, preserve, and enhance historic, cultural, and natural resources in the Rim of the Valley corridor. Because alternative D best meets all five of the five applicable criteria, alternative D would best meet the §101-B criteria”.

Under the discussion of Resource Protection: “The larger scope of alternative D provides the most opportunities for the NPS to play a direct role in long-term conservation of regional wildlife corridors through land acquisition and other means of land protection such as private land stewardship. Agencies and organizations within the added areas would continue to acquire lands for conservation and open space as permitted under existing authorities. The NPS would focus land acquisition on protection of core habitat areas in SMMNRA and in protection of core habitat areas in SMMNRA and in protecting critical wildlife corridors within the newly added areas”.

Further, the difference in cost between Alternative C and Alternative D is only in the range of \$500,000 to \$1,500,000 per year. Considering the population benefitted (the San Fernando Valley alone has a population of nearly 1.8 million people) and the other benefits cited above, this amount is truly money well spent.

Accordingly, because alternative D provides the greatest benefits for a modest cost, the SFVAS strongly supports alternative D. We actually cannot see why the NPS chose alternative C as the preferred option.

#### **Specific projects of SFVAS which would benefit from alternatives C and D:**

Sepulveda Basin: SFVAS has a number of activities in the Sepulveda Basin, including oversight of a wildlife reserve, children’s field trip programs, and regular bird watching walks. There have been issues with law enforcement and jurisdiction and interfacing with the Army Corps of Engineers which the NPS would be able to offer assistance with.

Santa Susana Field Laboratory: This area not only contains some of the most pristine natural areas in the region, but also structures of historical significance in the development of the U.S. space program and cultural artifacts of Native Americans. One of our SFVAS biologists has operated a field study lab in the facility for many years. SFVAS has been actively involved in a request to have the area designated a national monument, and has also been actively attempting to prevent an environmental disaster in the area due to proposed overzealous remediation of contaminants. SFVAS hopes that bringing this area within the SMMNRA would add the rational voice of the NPS to discussion of what to do with the area.

Chatsworth Nature Preserve: SFVAS in conjunction with other interested parties has been advocating for preservation of the area, which is owned by a local water agency. We at SFVAS believe the NPS would offer significant help in managing this resource.

Upper Brown's Canyon/Hidden Creeks Estates: This is a classic example of ill-considered residential development of mini-mansions in a wildlife corridor. SFVAS hopes that inclusion of the area in the SMMNRA would have an impact on the city and county agencies which are ultimately responsible for allowing this type of development to take place.

#### **Suggestions for improving the proposed alternatives?**

SFVAS enthusiastically anticipates working with the NPS to assist in implementing Alternative D (and any aspects of alternative C which are not duplicated in Alternative D).

#### **Other comments related to the draft study findings or the environmental assessment:**

##### **San Fernando Valley Audubon Society (SFVAS):**

The SFVAS is a volunteer environmental and educational nonprofit §501(c)(3) organization, active since 1906 in significant portions of the Study Area. Other local chapters of the Audubon society are also active in the Study area. There was no mention of SFVAS in the Study. We (the Conservation Committee of SFVAS) feel that SFVAS would be a valuable partner with NPS, both as a source of information for the Study and an asset in implementing the proposed NRA.

SFVAS offers programs at the Sepulveda Basin Wildlife Reserve for all grade levels and for youth groups, focusing on birds and riparian habitat, as well as leading many public bird walks there. SFVAS also provides funding for the RCD's Sepulveda Basin program. Like the other local Audubon chapters, SFVAS leads public bird walks at a variety of locations within the SMMNRA's current boundaries and within the proposed ROV expansion.

The areas served by SFVAS bird walks include the Sepulveda Basin, O'Melveny Park, Malibu Creek State Park, the Chatsworth Nature Preserve (during Earth Day open house), Placerita Canyon, sites in the Verdugo Hills, and more. SFVAS annually performs the Christmas Bird

Count at various locations in the study area. Participation is open to the public. Count data contributes to a nationwide database that is frequently cited by researchers. SFVAS is also engaged in systematic avian research at SSFL that has highlighted the importance of that area as a wildlife sanctuary

SFVAS also sponsors annual cleanups of Haskell Creek in the Sepulveda Basin Wildlife Reserve. Further, SFVAS volunteers staff information tables at many community events in the ROV neighborhoods.

Page 115 of the Study notes that the Resource Conservation District (RCD) of the Santa Monica Mountains offers ...science programming for grades 4-6 on freshwater lake habitats at Sepulveda Basin Wildlife Reserve... In fact, SFVAS created, co-administers, and pays for the grade 4-6 children's science programming at the Sepulveda Basin Wildlife Reserve. This includes providing each child with binoculars and access to microscopes. SFVAS contracts with RCD to provide naturalist guides.

Also on page 115, it is our understanding that the Children's Nature Institute has discontinued operations.

**Los Angeles City Public Works Department of Sanitation:**

Table D-4 on page 356 of the report notes that the Los Angeles Department of Water and Power is the Agency in charge of the Tillman Water Reclamation Plant, the L.A./Glendale Water Reclamation plant and the Hyperion Treatment Plant. There is also a Terminal Island Reclamation Plant which is not listed. The agency in charge of these reclamation plants is actually the Department of Sanitation (a division of the Los Angeles City Department of Public Works).

More troubling is the Department of Sanitation seems to be short-changed in the report. There are some general references to the Dept. of Public Works, but Sanitation plays an important role in preservation and quality of the LA River and Sepulveda Basin (along with LADWP and many other agencies).

**Special Status Wildlife:**

Page 359/360 should be expanded to describe the Bell's Vireo in Sepulveda Basin. There is one graphic that shows it there. The special status wildlife Table D-7 includes only observations recorded in CNDDDB and published biological surveys. They do note that it is likely that other special status animals occur in the study area in appropriate habitat. That caveat should be in bold type on Table D-7 – the table is obviously misleading with respect especially to the Sepulveda Basin and LA River. We would like to point out that SFVAS and other area organizations can provide a much more exhaustive picture of the ROV ranges of species of interest.

For example, in 2013 SFVAS provided the following comments related to the US Army Corps of Engineers destruction of the south reserve, in response to the Los Angeles Regional Water Quality Control Board's Investigative Order R4-2013-0001: #16: In the Wildlife Habitat section, observed species include Loggerhead Shrike and American White Pelican, both of which are California Bird Species of Special Concern. In the Rare, Threatened or Endangered Species section, they [US Army corps of Engineers] say that there are no State listed species in the area. Several other listed species are present later in the year including Bell's Vireo, Vaux's Swift, Yellow Warbler, and Yellow-breasted Chat."

**Santa Susana Field Laboratory:**

In discussing an accident at a nuclear reactor at SSFL in 1959, the Study makes the statement on Page 98. . ."more than a third of its fuel rods overheated and melted through their protective cladding, releasing a plume of radioactive gas into the atmosphere (Lochbaum, 2006)." It sounds like a virtual Chernobyl. The conclusions of the Lochbaum report have been refuted by a number of investigators, none of which are cited in the Study (Review of the Lochbaum Report by John Krsul, November 2006; Review of the Beya and Lochbaum Reports by John R. Frazier, Ph.D, November 2006; Chemical Behavior of iodine-131 during the SRE Fuel element Damage in July 1959, Jerry D. Christian, Ph.D., May 26, 2005; Investigation of Releases from Santa Susana Sodium Reactor Experiment in 1959, John A. Daniel Sr., may 27, 2005). The reality, far less exciting, was that two radioactive gases, certain isotopes of xenon and krypton, both inert, were released in small quantities.

SFVAS raises this point because the discredited Lochbaum report has provided fuel for sensational media articles which have resulted in significant public misunderstanding of the situation at the SSFL. The appendix to this letter is a further discussion of the history of the SSFL sodium reactor.

The SFVAS eagerly anticipates working with the NPS to implement the provisions of the study, and thanks the NPS for review of our comments.

Respectfully,

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**Appendix to SFVAS comments on the Study:**  
**Comments regarding the 1959 SRE accident at the Santa Susana Field Laboratory**  
**(Special Thanks to Abraham Weitzberg, Ph.D. for Contributing Much of the Following Information)**

The brief narrative presented in the Environmental Assessment is inaccurate and presents a false impression of the environmental effects of the 1959 accident.

As was well documented in many contemporaneous reports, and summarized in a DOE public workshop on August 29, 2009, the accident released no harmful radionuclides to the environment. Contrary to common belief, the reactor facility was thoroughly cleaned and repaired and refueled and then successfully operated for another several years. The facility was decontaminated in early 1970's, and released for unrestricted use. In 1999, the SRE facility was completely removed, with soil and debris excavated to bedrock.

During the accident itself, the cladding on portions of 13 of 43 fuel elements overheated to the point that the iron combined with a small portion of the uranium fuel and melted. Physical examination of the damaged fuel, confirmed by calculations, showed that about one percent of the fuel melted and released some of its fission product inventory to the system. Examination of the reactor system together with monitoring of radioactivity in the vicinity of the building confirmed that the only radionuclides that were released to the environment were the noble gases xenon and krypton. These rapidly decayed and dispersed and posed no threat to the health of workers or off-site residents. DOE Workshop panel member Dr. Tom Cochran of the NRDC concluded that the SRE accident posed no health threat in 1959 and certainly posed no health threat when he spoke in 2009.

The 2009 DOE workshop is fully documented on the DOE website, [http://www.etec.energy.gov/Community\\_Involvement/Public%20Meetings/SRE\\_Workshop.html](http://www.etec.energy.gov/Community_Involvement/Public%20Meetings/SRE_Workshop.html)

The DOE website also contains many of the historical Atomic International documents.

The narrative of ongoing risk from the SRE accident and other site operational activities has been used for decades by those who advocate a cleanup of SSFL that would destroy its ecological and historical value. It is part of a campaign to engender fear to drive a cleanup that does not consider either science or risk. The value of the SSFL area as part of the Rim of the Valley should not be diminished by fear mongering based on misinformation. It will, however, be necessary to deal with inaccurate perceptions of risk and needed remediation, which have been spawned by years of misinformation.