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# CITY OF LOS ANGELES





ELYSIAN VALLEY RIVERSIDE NEIGHBORHOOD COUNCIL www.myevrnc.com

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### ELYSIAN VALLEY RIVERSIDE NEIGHBORHOOD COUNCIL CONSEJO VECINAL DE ELYSIAN VALLEY RIVERSIDE

August 11, 2021

Department of Toxic and Substance Control Chatsworth Regional Office 9211 Palmdale Avenue, Chatsworth CA 91311-6505

Pete.Cooke@dtsc.ca.gov

## Draft Removal Action Workplan (RAW) for 1771-1831 W. Blake Avenue

Dear Mr. Cooke:

The Elysian Valley Riverside Neighborhood Council (EVRNC) is writing to express concern regarding the presence of Perchloroethylene (PCE) on the Blake Avenue Project. It creates an environmental impact on surrounding residents and urban wildlife that must be remediated. It's surprising and disappointing that the City provided entitlements, before ordering a clean-up.

Our questions to the Department of Toxics and Substance Control (DTSC) raised during our Environment Land Use Committee on July 28, 2021, have yet to be answered. DTSC failed to attend our EVRNC meeting Wednesday, August 11, 2021 to answer these questions, and we formally request that they be addressed in writing before approving the draft RAW.

- 1. QUESTIONS FROM Environment and Land Use Committee to DTSC (July 28, 2021)
  - What is the DTSC residential screening level of PCE on this site currently?
  - What is the difference between a vapor extraction system and the proposed VIM system?
  - What level of lead was found on the site and will this clean up address it?
  - At what point would the VIM or the VES system if installed, no longer require DTSC oversight?
  - What are differences in long term maintenance and management of the two systems?

Neither you nor your staff attended our General Board Meeting of the EVRN on August 11, 2021 when the matter was discussed. We adopted this letter unanimously, to comment on the record about our disappointment in the regulatory agencies, developers and the City in coordinating this review with the public. Your disregard for our concerns and the fact that the City issued entitlements before studying the environmental impacts, of this site or ordering a clean-up---also speaks to the ongoing, cumulative public health issues facing Elysian Valley and the lack of oversight of enforcement of soil, water and air quality regulations.

Our community is subject to multiple air pollution impacts from surrounding freeways, Metrolink Central Maintenance Facility, freight rail, diesel trucks servicing local businesses, historic brown sites in the area including but not limited to the Blake Avenue Project. Elysian Valley has long been neglected when it comes to public health, and suffers a disproportionate pollution burden due to poor enforcement and inspection of city permits and a slow clean-up of toxic pollution on former industrial sites, with housing units on them.

We urge the State to mandate that all industrial parcels in the river zone meet State Residential cleanup standards if they want to build housing, parks, shops or green space. Please mitigate the gas in the soil under this site in the safest possible way for the longest term and in a sustainable manner.

Regarding the specific options for the draft RAW, we strongly reject Option 1; it is unethical to do nothing. Our council supports cleaning the site, either via Option 2 (vapor extraction system-VES) or option 3, however, given that our questions remain unanswered, we cannot determine which method would be safest, enduring, and most sustainable for the community and wildlife.

Sincerely

Carrie Sutkin

President, Elysian Valley Riverside Neighborhood Council

Cc: LA City Councilmember Mitch O'Farrell, Council District 13

Buckley, Charles I. "Draft Removal Action Workplan (RAW) Proposed Residential Redevelopment Project APNs 5442-009-021; -022, & -024 1771, 1817, 1829, & 1831 West Blake Avenue Los Angeles, California 90031." p. 21. Envirostor, CDTSC, 17 Dec. 2020 <a href="https://www.envirostor.dtsc.ca.gov/public/deliverable\_documents/5402953922/Frogtown%202020-11-xx%20draft%20RAW.pdf">www.envirostor.dtsc.ca.gov/public/deliverable\_documents/5402953922/Frogtown%202020-11-xx%20draft%20RAW.pdf</a>.