



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

February 25, 2025

Kiersten Turner
Planning Assistant
City of Los Angeles
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kiersten.turner@lacity.org

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR 1235 VINE STREET DATED
FEBRUARY 18, 2025, STATE CLEARINGHOUSE NUMBER [2021050548](#)

Dear Kiersten Turner,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for 1235 Vine Street (Project). The Project includes the demolition of three commercial buildings, five residential bungalows, and associated surface parking, for the development of a seven-story, mixed-use building that would include 115,680 square feet of office use and 7,810 square feet of ground floor restaurant and/or retail uses. DTSC recommends and requests consideration of the following comment:

1. The document recommended a Soil Management Plan (SMP) be prepared and implemented during earthwork redevelopment activities in case soil impacts are encountered during grading and excavation activities. As part of this SMP, any on-site contaminated soils, including soils that could potentially be imported to the Site, would be assessed to confirm that they are handled in compliance with all applicable regulatory guidance. DTSC does not recommend a SMP be used as a primary cleanup plan. DTSC recommends

that any potential contamination be fully characterized and then remediated under the oversight of a [self-certified local agency](#), DTSC or Regional Water Quality Control Board. A SMP alone cannot sufficiently identify and document the potential contaminants that may pose a threat to human health and the environment. DTSC recommends that a cleanup plan, a Removal Action Workplan (RAW) or Remedial Action Plan (RAP), be prepared to adequately address all site impacts after complete characterization.

If entering into one of DTSC's cleanup plans such as a voluntary agreement, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have any questions about the application portal, please contact your [Regional Brownfield Coordinator](#).

2. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC appreciates the opportunity to comment on the DEIR for 1235 Vine Street Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like

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clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

Tamara Purvis

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cc: (via email)

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