



**Yana Garcia**  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

October 27, 2023

Gina Liang  
Landscape Architect  
City of Los Angeles, Department of Public Works  
1149 S. Broadway 4<sup>th</sup> Floor  
Los Angeles, CA 90015



RE: MITIGATED NEGATIVE DECLARATION (MND) FOR THE BROADWAY-MANCHESTER ACTIVE TRANSPORTATION (ATP) EQUITY PROJECT DATED OCTOBER 04, 2023 STATE CLEARINGHOUSE # [2023100156](#)

Dear Gina Liang

The Department of Toxic Substances Control (DTSC) received a MND for the Broadway-Manchester Active Transportation (ATP) Equity Project. The City of Los Angeles Bureau of Street Services proposes safety and mobility improvements along a 2.8-mile stretch of South Broadway and Manchester Avenue. The Project would extend along South Broadway from Manchester Avenue to Imperial Highway and along Manchester Avenue from Vermont Avenue to South Broadway. The proposed improvements would be constructed in four phases and would include protected cycle tracks, curb extensions, signal modifications, new pedestrian hybrid beacon (PHB) signals, sidewalk improvements, new and widened medians, median parks, tree planting, landscaping, new pedestrian lighting, and new stormwater infrastructure.

DTSC has identified that this Project may affect a potentially hazardous site, [Sani Dip Cleaner](#) that is located at 9117 Broadway, Los Angeles, CA 90003, on the western side of South Broadway, approximately 60 feet north of West 91<sup>st</sup> Place. In March of 2023, EFI Global prepared a Phase I Assessment for this Site. Historically, the property was used for dry-cleaning purposes from approximately 1946-1996 under the names Sani Dip System Cleaners & Laundry, Sani Dip Cleaners, Sani Dip Cleaners of Los Angeles.

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There was documented use of PCE at the Site. Two Hazardous Waste USEPA Identification numbers (CAD043101161, CAD982480147) were issued to the Site between 1983 and 1995, and between 1989 and 1995, respectively. Two notices of violation (NOVs) were issued to the Site by the South Coast Air Quality Management District. The first NOV was for failing to properly store PCE solvent in a container in 1985. The second NOV was for failing to obtain a permit to operate a PCE solvent dry-cleaning machine in 1989. The Site is currently a vacant lot covered in vegetation. Additional information and the Phase I Assessment can be found on the Site's EnviroStor page ([Envirostor ID 60003327](#)). Based on our Project review, we request the consideration of the following comments:

1. DTSC recommends that a site investigation testing for PCE be conducted before any ground disturbance or excavation takes place at this location due to the ground disturbance for this Project may release PCE into the air.
2. The Initial Study (IS) states that *"the project would require excavation to a maximum depth of 25 feet for the new stormwater infrastructure."* If this excavation occurs at or near Sani Dip Cleaners (9117 S Broadway), DTSC recommends a site investigation for PCE contamination should be conducted first.
3. In section 2.8 of the IS, it is stated that *"a limited Site Investigation consisting of shallow boring would be conducted within a public ROW adjacent to 304 West Century Boulevard, 9915 South Broadway, and 9422 South Broadway."* DTSC recommends adding the 9117 S Broadway address to this list of properties to be tested and that this testing be conducted prior to any ground disturbance activity.
4. In section 4 (Mitigation Measures), the IS states that for Hazards and Hazardous Materials, *"Impacts would be less than significant, and no mitigation is required."* If the above comments are taken into consideration and the investigation reveals PCE contamination at a concentration that is impactful to human health, this section should be revised to reflect this, and Mitigation Measures should be taken into consideration.

DTSC appreciates the opportunity to comment on the Broadway-Manchester Active Transportation (ATP) Equity 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 any clarification on DTSC's comments, please respond to this letter or reach out to the Project Manager, Naomi Raal at [Naomi.Raal@dtsc.ca.gov](mailto:Naomi.Raal@dtsc.ca.gov) for additional guidance.

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Sincerely,

*Tamara Purvis*

Tamara Purvis  
Associate Environmental Planner  
HWMP – Permitting Division - CEQA Unit  
Department of Toxic Substances Control

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cc: Governor's Office of Planning and Research  
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