



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
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SENT VIA ELECTRONIC MAIL

September 19, 2024

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

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 9000 AIRPORT BOULEVARD PROJECT DATED AUGUST 21, 2024, STATE CLEARINGHOUSE NUMBER [2024080852](#)

Dear Kiersten Turner,

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the 9000 Airport Boulevard Project (Project). The proposed Project would develop up to 435,390 square feet of industrial uses on an approximately 18-acre site. The Project includes two options: One option would develop a building comprised of up to 435,390 square feet of industrial floor area and a maximum building height of 50 feet; the second would develop 3 buildings comprised of up to 410,056 square feet of industrial floor area and a maximum building height of 46 feet. A total of 37,860 square feet of existing commercial/industrial floor area uses and associated surface parking areas would be demolished. After reviewing the Project, DTSC recommends the following comments for your consideration:

1. The proposed Project location overlays the formerly used defense site designated as [Los Angeles Air Force Station Annex No. 1, Westchester, California, Site No. J09CA045300](#). Please incorporate information about site history and any site remediation efforts conducted by the U.S. Army Corps of Engineers for this property.
2. There is indication that aqueous firefighting foam (AFFF) was used, stored, or released at the property, DTSC recommends sampling for per- and poly-fluoroalkyl substances (PFAS) in accordance with the protocols identified by the [U.S. Environmental Protection Agency](#). Please incorporate remediation efforts and findings in the EIR.
3. In Section IX, under the evaluation of Hazards and Hazardous Materials subsection (b), the Initial Study (IS) states that “given the age of the existing structures and previous uses, asbestos containing materials (ACM), lead-based paints (LBP), and/or other recognized environmental conditions may be present on the site.” DTSC appreciates that a more in-depth evaluation of the historical site uses, and potential contaminants will be conducted in the Environmental Impact Report.
 - a. If upon completing the evaluation, it is made known that any volatile materials may have been released to the environment, DTSC recommends conducting a comprehensive soil vapor investigation to determine the nature and extent of any vapors that could potentially cause an indoor air exposure to future buildings.
 - b. The IS references the potential presence of ACM. While DTSC is not the oversight agency for ACM, it is prudent to ensure that the appropriate measures are taken, in consultation with the South Coast Air Quality Management District on proper handling and disposal procedures, as necessary.
 - c. Additionally, if buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of LBP or products, mercury, ACMs, and

polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's Preliminary Endangered Assessment \(PEA\) Guidance Manual](#).

- d. As an added precaution, due to the proximity of residential homes, perimeter air monitoring during demolition activities is advised.
4. DTSC recommends the City of Los Angeles enter into a voluntary agreement to address contamination at brownfields and other types of properties or receive oversight from a [self-certified local agency](#), DTSC or Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, 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](#).
5. 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 PEA 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 the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

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DTSC believes the City of Los Angeles must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA. DTSC looks forward to reviewing the EIR once available and reserves the right to provide applicable comments at that time.

DTSC appreciates the opportunity to comment on the NOP of a DEIR for the 9000 Airport Boulevard 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 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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