



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

2656 29<sup>th</sup> Street, Suite 201  
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.  
(949) 887-9013  
[mhagemann@swape.com](mailto:mhagemann@swape.com)

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Jamie T. Hall  
Channel Law Group  
8383 Wilshire Blvd., Suite 750  
Beverly Hills, CA 90211

**Subject: Project at 4511 Russell Avenue, Los Angeles, California**

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Dear Mr. Hall:

I have reviewed documentation for a project at ("Project") located at 4511 Russell Avenue in Los Angeles. The Project Applicant proposes to demolish two single-family dwellings and construct a three-story, 4,816 square-foot, four-unit residential building. The City of Los Angeles determined the Project to be Categorically Exempt from CEQA and no documentation is available from the City to determine if adjacent land use pose impacts from Hazards and Hazardous materials.

The property is directly behind a lot at 4510 Franklin Avenue which was a gas station from the 1930s to 2004. The project is also next door to a dry-cleaning business at 1857 Hillhurst Ave.

According to the Geotracker website, the gas station (Chevron #9-0140 (T0603790020) was investigated for environmental concerns beginning in 1989 and was assessed until 2013 when it was closed by the Los Angeles Fire Department. Contaminants were listed at the Geotracker website to include waste oil, motor oil, hydraulic oil and lubricating oil in soil.

No investigation documentation is available at the Geotracker website to ascertain if impacts may be posed by the former gas station. An evaluation of impacts would include a review of environmental investigation documentation to see if the Los Angeles Fire Department allowed any levels of contamination to remain in place in soil or groundwater and if any soil vapor concerns were evaluated. An appropriate vehicle for this evaluation would be a Phase I environmental assessment, a fundamental component of Hazards and Hazardous Materials evaluations under CEQA in Los Angeles. No Phase I was completed for the Project and therefore, Hazards and Hazardous Materials impacts are inadequately disclosed.

Additionally, potential impacts from the dry-cleaning business located next door have not been evaluated. According to information in the public record for this Project, the dry-cleaning business generated a drum of soil in 2013 that was labeled to contain "soil, trace tetrachloroethylene." According

to the Agency for Toxics Disease Registry, the US EPA considers tetrachloroethylene to be a likely carcinogen (<https://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=264&tid=48>). No investigations of the dry cleaners are documented at the Geotracker website. Again, a Phase I ESA would be an appropriate document to complete for purposes of disclosing any Project impacts from the dry cleaners.

Sincerely,



Matt Hagemann, P.G., C.Hg.