



## CITY OF CARSON

1. Applicant Identification  
City of Carson  
701 E. Carson Street  
Carson, CA 90745
2. Funding Requested
  - a. Assessment Grant Type: Community-wide
  - b. Federal Funds Requested: \$500,000
3. Location
  - a) City of Carson b) Los Angeles County c) California
4. Target Area and Priority Site Information
  - a. Target Area Information: Census Tracts 06037543100, 06037541002, & 06037543501
  - b. Priority Site Information:
    - i. Carson Housing Authority Property – (33.831340, -118.285691)
    - ii. SyWest Development – 20151 South Main Street, Carson, CA, 90745
5. Contacts
  - a. Project Director  
John Raymond, Assistant City Manager  
- Economic Development 310-952-1773  
[JRaymond@carsonca.gov](mailto:JRaymond@carsonca.gov)  
701 E. Carson Street  
Carson, CA 90745
  - b. Chief Executive/Highest Ranking Elected Official  
Lula Davis-Holmes, Mayor  
310-952-1700  
[LDavis-holmes@carsonca.gov](mailto:LDavis-holmes@carsonca.gov)  
701 E. Carson Street  
Carson, CA 90745
6. Population  
City of Carson, California: 92,388 (US Census: 2017–2021 American Community Survey)



7. Other Factors

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	NA
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
At least 30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area.	NA
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

8. Letter from the State or Tribal Environmental Authority  
See attached.

9. Releasing Copies of Applications  
Not Applicable.



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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Meredith Williams, Ph.D.  
Director  
5796 Corporate Avenue  
Cypress, California 90630



**Gavin Newsom**  
Governor

October 26, 2023

### DEPARTMENT OF TOXIC SUBSTANCES CONTROL LETTER OF ACKNOWLEDGMENT FOR THE CITY OF CARSON'S U.S. ENVIRONMENTAL PROTECTION AGENCY MULTIPURPOSE, ASSESSMENT, REVOLVING LOAN FUNDS, AND CLEANUP GRANT APPLICATION FOR COMMUNITY-WIDE ASSESSMENT

Dear Ms. Hanusiak:

The Department of Toxic Substances Control (DTSC) of the California Environmental Protection Agency (EPA), is the primary brownfield regulatory agency in California. On behalf of California's people and environment, we are pleased to acknowledge and support the City of Carson's (City) application for a U.S. EPA Multipurpose, Assessment, Revolving Loan Funds (RLF), and Cleanup (MARC) grant for a Community-wide Assessment Grant of \$500,000.

The City is a recipient of the DTSC Equitable Revitalization Community Grant (ECRG) Round 1 and has successfully utilized 100% of the \$315,000 Site-specific Investigation Grant for the Sywest Development project within one year of receiving the award. Completing the project one year earlier than required is a testament of the tremendous need for resources to address brownfields in Carson. It also highlights the City's ability to manage brownfield grants efficiently and effectively. The City has applied to ECRG Round 2 and intends to apply to future ECRG rounds.

We strongly and unequivocally support the City's application for a Community-wide Assessment Grant to address the community within and around the City. Carson is a community of nearly 100,000 residents and is considered to be a vulnerable and underserved community with a history of environmental justice issues. Environmental justice and public health concerns, including pollution and compounded health risks stemming from the concentration of landfill, refineries, port related activities, and other industrial activities in and nearby the city, have a long history in Carson that predates its incorporation as an independent city in 1968. Carson continues to face environmental justice issues with the majority of areas in the city being designated CalEnvironScreen 4.0 Tracts within the 75% percentile or more. And despite being located in one of the largest metropolitan areas in the country (where land value is very high) and surrounded by cities that are practically fully built, many sites in Carson remain undeveloped because of

contaminated land. It has also been well established by local residents and the Carson community that the need to address brownfields is of highest priority in the community. Over the past two years alone, several plans and policies were adopted by the City to highlight this importance including, but not limited to, the following:

- Resolution No. 22-068 - This resolution declared the City's intention to formally prioritize the remediation and development of vacant, environmentally challenged properties in the City and develop a comprehensive economic development ordinance to facilitate remediation and development of contaminated properties.
- Carson 2040 General Plan Community Health & Environmental Justice Element, Policy CHEG-6 – This policy states the following: "Explore opportunities and seek funding to remediate and redevelop brownfields as sites to spur economic development, expand natural open spaces and parks, community gardens, and other similar health-promoting community revitalization activities, particularly in underserved neighborhoods."
- 2023 Economic Development Strategic Plan, Strategy 6.E – This strategy provides the following: "Partner with property owners to assess, investigate, and clean-up contaminated sites, establishing Carson as a "national best-practices leader" in brownfield remediation and redevelopment."

While policies and plans reflect the desires and aspirations of the community, without the funding and resources needed, these visions may never be realized. If awarded the MARC grant, the City would use funds for Community-wide Assessment including inventory development, community involvement, site reuse planning, assessment, and cleanup planning for brownfield sites. Funds would also be used to build in-house capacity and form new partnerships with community-based institutions to tackle brownfields. Even prior to being awarded any assessment grants for extensive outreach, the City has already identified sites that can utilize assessment funding, including:

- 526 W. Carson / 21704 Figueroa Street (APN 7343-019-008, 7343-019-011): A Carson Housing Authority owned lot proposed for Veteran's affordable housing development. The Housing Authority purchased the property in 2018. Environmental conditions will need to be evaluated for the safety of future residents. The site was a former gas station that closed in 1998, and this site has remained vacant for at least 15 years.
- 20151 Main Street (APN: 7336-004-016): This 24-acre privately owned (owned by Southbay Carson, LLC) and former landfill site is proposed for a large retail center providing access to healthy and affordable foods to the community. The City has worked with the owner for many years and have entered into an Economic Development Benefits Agreement for the future reuse and redevelopment of the site.
- 801 W. Carson Street (APN 7337-006-922): The Carson Community Center is proposed for possible expansion including a new hotel development. This site serves as a center for the Carson community and hosts many events including local

job fairs and workforce training sessions. A site extension of this Center may allow for the expansion of these events that serve the community. A new hotel development would bring additional visitors to the area. These visitors can patronize many locally owned mom pop businesses across from the Center.

- Near 321 W. Sepulveda (APN 7337-006-922): This 10.5-acre former nursery site is proposed for a regional park development for a park-deficient community. The site is owned by the Los Angeles County Sanitation District (public entity), and the City has a long-term lease to develop the site into a park. The City is conducting its due diligence to determine the viability of a park development on this site. Securing a site this large in an area where land value is high is a major milestone City has already overcome. Additionally, the City has also secured \$13 million in external grant funding that can be used toward the construction of the park.

- 24219 S. Avalon (APN 7406-018-909): This property is a Carson Successor Agency owned (public entity) parcel that currently serve as a parking lot for a mom & pop pizza restaurant next door. The property may be purchased by the City or the Carson Housing Authority in the future for Veteran's affordable housing development.

- 20331 S. Main Street (APN 7336-004-010): This 5.36-acre site is privately owned (owned by Gaudenti and Gaudenti) and currently operate as a nursery. The future proposed use is unknown. In 2007, a housing development was proposed for the site. However, no recent efforts have been made towards the redevelopment of the site. The City endeavors to transform the site to a use that benefits the local community.

- Additional sites to be evaluated as part of assessment outreach and inventory development.

The City has the ability to form partnerships and leverage all possible resources to address the important issue of brownfields in Carson. Since 2020, City of Carson has partnered with the County of Los Angeles to form the Carson Enhanced Infrastructure Financing District (EIFD), a property tax increment financing district. With the formation of the Carson EIFD now complete, the City and County of LA plan to share its property tax increments to address environmental remediation, affordable housing and other economic development initiatives. The Carson EIFD is one of very few multi-jurisdictional partnerships in the state where two taxing entities have agreed to commit its property tax increments to a common cause. However, because revenues in an EIFD are tax-increment based, without completed redevelopment projects, no increments would be generated to fund environmental remediation. The City plans to use MARC and ECRG to accelerate the redevelopment process, which in return will create future property tax increment revenues for the Carson EIFD.

DTSC stands ready to provide the necessary technical support and regulatory oversight, as needed. If you need further information or assistance regarding specific brownfield sites, or any of the DTSC's brownfield programs, please feel free to contact me at [rana.georges@dtsc.ca.gov](mailto:rana.georges@dtsc.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Rana Georges". The signature is written in a cursive, flowing style.

Rana Georges  
Senior Environmental Scientist/ECRG Portfolio Manager  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control



CITY OF CARSON

**City of Carson, CA  
FY24 Brownfields Assessment Grant  
Narrative**

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

a. **Target Area and Brownfields** i. Overview of Brownfield Challenges and Description of Target Area: The City of Carson (City) is situated in the southern part of Los Angeles County, California, within the South Bay region, surrounded by neighboring cities such as Torrance, Compton, and Long Beach. The City has a history entwined with environmental justice and public health issues, such as pollution and heightened health risks, arising from the clustering of landfills, refineries, and various industrial activities within and near the City. These concerns predate the City's official incorporation as an independent entity in 1968. In the 1920s, oil discovery shifted Carson's economy from agriculture to industry, attracting drilling operations and refineries. World War II further fueled industrial growth, leading to post-war population explosion and continuous industrial expansion. As an unincorporated city, Carson lacked political influence, allowing the establishment of heavy industrial facilities and becoming a dumping ground for the South Bay region. Brownfield challenges, like illegal dumping, worsened existing contamination issues, contributing to ongoing health impacts in residential areas, including respiratory problems and increased cancer cases.

The City has been engaged in an ongoing struggle to surmount these initial obstacles that still hinder its advancement. Many pivotal development sites in Carson bear a history as landfills or former refineries, demanding thorough procedures to tackle environmental remediation before any new construction can commence. This is extremely costly and has halted new development in the City, which has resulted in stunted economic growth. The Brownfields Assessment Grant will provide much-needed funding to conduct Environmental Site Assessments on brownfields sites within the target area to clear them for redevelopment. It is imperative for the City to persist in its endeavors to assess and remediate the contaminated industrial sites, in order to improve the health and economic viability of the community.

The **geographic boundary** for this application is the city limits, with a **target-area focus on Census Tracts (CTs) 06037543501, 06037541002, and 06037543100, which are classified as Justice40 Disadvantaged CTs.** The City of Carson is ready to address the underused areas but lacks the funding to upgrade and improve its economic status. Brownfield Grant funding will allow the City to conduct environmental assessments on target-area properties, which is crucial for advancing redevelopment efforts while also fostering economic growth and prosperity for the City's future.

ii. Description of the Priority Brownfield Site(s): With abandoned businesses and properties falling into various states of despair over the last several decades, the target area hosts more than 100 properties consisting of vacant commercial and industrial buildings such as gas stations, laundromats, warehouses, restaurants, storage buildings, and vacant lots. These sites present a potential hazard to human health and the environment. The City has selected the following priority sites for assessment and future redevelopment: the Carson Housing Authority Property and the SyWest Development site. These two sites have strong redevelopment potential as they are in prime locations, including the City's downtown area (Priority Site 1) and the Flex District (Priority Site 2), and are **less than a mile away from a number of churches, schools, residential neighborhoods, childcare centers, and city parks.**

The first priority site, the Carson Housing Authority Property (0.4 acres), is near the western city limits, approximately 350 feet east of the 110 Freeway. The site encompasses two adjacent vacant parcels at 526 West Carson Street and 21704 Figueroa Street currently enclosed by a fence. The land is graded, exhibits a moderate level of vegetative growth, and has accumulated trash and debris throughout the site. Previously, the site housed Arco Service Station #5108. The station is believed to have been built in the mid-1900s and operated until its closure in 1998. Since then, the



site has remained vacant. Environmental concerns include the potential for **volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and total petroleum hydrocarbons (TPHs)** from oils, gasoline, and diesel. There is also the potential for asbestos-containing materials (ACM) and lead-based paint (LBP) contaminants in the soil from previous building materials. Each of these constituents are known carcinogens, posing health risks to the surrounding community. An additional environmental concern is the proximity of state groundwater wells located within 1,500 feet of the site. The assessment of this site is crucial due to its intended future use for affordable housing, and since the Housing Authority owns this site, the assessment can commence immediately.

The second priority site, the **SyWest Development** (24.32 acres), is located at 20151 South Main Street. Prior to 1964 the site existed as agricultural land for grazing and remained otherwise fallow until it operated as a landfill from 1964 to 1971. After the landfill closed in 1971, the site remained vacant until the development of the Southbay Six Drive-in Theatre, which operated until 2000. Subsequently, the site was redeveloped as an automobile auction facility and currently serves as a parking area for automobiles. Methane extraction wells are dispersed across the site and several unlabeled 55-gallon drums along with equipment for the site's former landfill gas collection and treatment system are located onsite as well. Environmental concerns include the potential for **TPH, VOCs, SVOCs, organochlorine pesticides (OCPs), polychlorinated biphenyls (PCBs), organophosphorus pesticides (OPPs), chlorinated herbicides, asbestos, dioxins, hexavalent chromium, and polyfluorinated substances (PFAS), all of which impose serious health risks to neighboring populations.** The site is slated for conversion into a grocery retailer as provided under the binding Economic Development Benefit Agreement between the City and site owner/developer. Site owner also authorizes the City to assess the site for environmental investigative work. This site is crucial to the prosperity of the City's future because target-area residents lack access to healthy food retailers. Redevelopment of this site would not only furnish health and accessibility benefits but also provide opportunities for employment.

iii. Identifying Additional Sites: The City has already identified more than 100 potential target-area brownfield sites through the Infrastructure Financing Plan (IFP), windshield surveys, and review of hazardous materials databases and historic records. The sites identified in the IFP were selected based on their potential to benefit from catalytic infrastructure improvements with community-wide and regional benefits and since the EIFD only encompasses 14% (1,735 acres) of the City's 12,141 acres, the City will hold public meetings and will work diligently with target-area residents and community partners to prioritize additional brownfield sites through a more in-depth grant-funded site inventory and evaluation ranking criteria process. Prioritization criteria will comprehensively assess whether a site is situated within an underserved community or falls within a disadvantaged CT. This evaluation will encompass a range of socioeconomic indicators, including income levels, access to essential services, educational opportunities, and healthcare resources. Additionally, the criteria will consider any historical or systematic disparities that may have contributed to the community's disadvantaged status.

b. **Revitalization of the Target Area** i. Reuse Strategy and Alignment with Revitalization Plans: The City acknowledges the need to revitalize the numerous brownfield sites within its bounds. The City's 2024 General Plan update focuses on future land use and revitalization throughout the community and the target area. The Plan's objective is to foster dynamic commercial hubs, diversify activities throughout the city, and encourage a mix of compatible uses. Its strategic approach emphasizes concentrated development in the downtown core and surrounding centers, leveraging the progress achieved by recent corridor development along Carson Street. These centers will include a mix of affordable housing, employment opportunities, and commercial ventures. Complementing the General Plan update, the City unveiled its Economic Development

Strategic Plan (EDSP) in September 2023, outlining eight core initiatives and 21 strategies/programs to bolster the EDSP's objectives while reinforcing the General Plan's vision.

The planned transformation of the **Housing Authority Property (Priority Site 1) into affordable housing for veterans and the conversion of SyWest Development (Priority Site 2) into a grocery retailer** align seamlessly with the initiatives outlined in these plans. These initiatives will play a pivotal role in revitalizing underused properties in the downtown area, generating employment opportunities, addressing the critical need for affordable housing, and enhancing accessibility across the target area and its environs.

ii. Outcomes and Benefits of Reuse Strategy: The City is dedicated to fostering a dynamic, economically robust, and community-centric environment while rectifying historical environmental challenges and enhancing residents' well-being. The redevelopment of target-area properties represents significant strides toward achieving these goals. The proposed revitalization of the **Carson Housing Authority Property** holds both economic and noneconomic benefits for the community. The establishment of affordable housing for Veterans near a regional rapid transit line (**noneconomic benefit**) will not only enhance the area's infrastructure, curbing blight and reducing exposure to environmental hazards but will also lead to increased property values and tax revenues (**economic benefit**). The redevelopment of the **SyWest Development** site into a grocery retailer will bring a **noneconomic** benefit in the form of improved access to nutritious food for residents in the City's western region. Simultaneously, it would yield an **economic** benefit by creating permanent living wage job opportunities for community members. The construction phase of both sites would yield an economic benefit in the form of temporary job creation at livable wages. The City is dedicated to promoting energy-efficient resources and renewable sources like solar, wind, and renewable natural gas in target-area redevelopment. Incentives for solar panel installation, including tax credits and rebates are offered, along with streamlined permitting and informational resources from the City. The redevelopment plan also addresses flood risks through the deployment of flood-resistant techniques and city-wide climate resilient infrastructure, reducing the need for constant repairs, thus enhancing urban resiliency, stability, and eco-friendliness.

**b. Strategy for Leveraging Resources** i. Resources Needed for Site Reuse: The City is seeking additional funding to advance its brownfield redevelopment objectives and has applied for three Equitable Community Revitalization Grants (ECRG) from the Department of Toxic Substances Control (DTSC) totaling \$875,000. These funds would go toward site investigation and cleanup. Additionally, Carson has successfully utilized post-redevelopment dissolution state laws to form its own TIF entity in partnership with another taxing entity (County of Los Angeles). This newly formed entity is called the Carson EIFD. The Carson EIFD have adopted an infrastructure financing plan (IFP) whereby significant property tax increments from both the City of Carson and County of Los Angeles have been specifically dedicated to address brownfield remediation in Carson long-term. The City plans to use ECRG to accelerate the redevelopment process, which in return will create future property tax increment revenues for the Carson EIFD. The City has applied and is also actively applying to dozens of other grants at local, state, and federal levels to supplement brownfield redevelopment efforts including Infill Infrastructure Grants, Climate Pollution Reduction Grants, and California Community Resilience Center grant.

ii. Use of Existing Infrastructure: The City's plans for target-area redevelopment will include the use of existing infrastructure (streets, transportation, water/sewer, power). The infrastructure to support brownfield redevelopment is already in place at the priority sites and target areas. In the event existing infrastructure needs repair or to be replaced to further this revitalization effort, the City will look to state and federal funding sources.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

a. **Community Need** i. **The Community's Need for Funding:** The target area hosts a **economically disadvantaged population of 18,477**. This economic struggle is evident in the downtown area, which exhibits **lower-than-average median household incomes, standing at \$77,420, compared to the city average of \$92,548 and the state average of \$84,097.**<sup>1</sup> In addition, **the target area has an average poverty rate of 12% (City 9%), an unemployment rate of 8% (City 7%), and a per capita income of \$28,564 (City \$32,564, US \$37,638).**<sup>1</sup> Apart from the challenges posed by low income, the City has witnessed a notable deceleration in population growth in recent years, primarily attributable to a scarcity of affordable housing, limited access to a diverse and nutritious food supply, an influx of compounded risks from pollution, and limited access to public healthcare facilities. Between 2010 and 2020, the population experienced a meager increase of just 1.5%. In contrast, the County of Los Angeles saw a considerably higher growth rate of 4% for the same period.<sup>1</sup> This underscores how the City's limited resources are impeding its potential for creating an improved quality of life for its residents.

The City lacks funds for vital environmental assessments crucial for revitalizing the underserved community. While the newly formed EIFD is expected to generate revenue, it won't be available until EIFD developments are completed, as it's based on property TIF. However, these developments won't progress swiftly without extra funds for brownfield assessment. Brownfield funding would expedite EIFD development, leading to more long-term funding for environmental remediation. Nevertheless, this process will take years, whereas redevelopment is urgently needed now. The City actively seeks federal and state funding for projects, as it doesn't have the funds to conduct assessments independently. Without additional environmental assessment funding, target-area residents face ongoing blight and health risks from underused properties. The EPA Assessment Grant will be crucial in kickstarting revitalization and fortifying the community.

ii. **Threats to Sensitive Populations** (1) **Health or Welfare of Sensitive Populations:** The **sensitive populations living within the target area include minorities, the elderly, persons with disabilities, and those living in poverty.** The target area is home to a large, minority sensitive population - African American (31%), Hispanic or Latino (41%), and Asian (20%) persons, putting the City within the **93rd percentile for people of color** in the US.<sup>1</sup> The target-area population is **52% female** in comparison to the national average of 50%.<sup>1</sup> 12% of the target area population is living below the poverty level and 17% are under the age of 18 and living below poverty. These numbers are higher than the City averages of 9% and 11%.<sup>1</sup> This population also includes an elevated number of residents **who depend on government food assistance (13%),** which is higher than state and national averages (9%, 11%).<sup>1</sup> The target area is also in the **78th percentile of persons living with disabilities (14%)** compared to the state's 11%.<sup>2</sup> Redevelopment of the priority sites will dramatically improve the quality of life for target-area residents by addressing welfare issues such as **lack of affordable housing, high unemployment rates, and limited access to healthy food options.** Additionally, the rental vacancy rate within the target area is 8.2%, almost four times higher than the City's rate of 1.6%, which can be attributed to the lack of affordable housing options and high rental rates.<sup>1</sup>

The target area's median home value is \$387,800, which is roughly 1.5 times higher than the national value (\$244,900).<sup>1</sup> Target-area monthly rent averages \$1,305, whereas the city average is \$1,658. Despite lower rent, the Climate and Economic Justice Screening Tool (CEJST) highlights that the target area is in the **70th percentile of low-income households spending more than 30% of their income on housing,** on top of having an unemployment rate of 8%, significantly higher

<sup>1</sup> US Census 2017- 2021 American Community Survey

<sup>2</sup> EPA EJ Screen Report – Target Area

than the national rate of 5%.<sup>2</sup> Redevelopment of priority site 1 would provide new affordable housing options, local employment opportunities, and removal of blighted areas within the City's downtown area. Similarly, priority site 2's redevelopment would yield both short-term and permanent job opportunities, remediation of potentially contaminated sites posing health risks to nearby residents, and serve as a vital source of nourishing food for the community, particularly crucial given that this area is located in a **USDA Food Desert**. In addition, 11% of the target-area population lacks access to a vehicle, exceeding the City (4%), state (7%), and national (8%) averages.<sup>2</sup> These challenges underscore the critical importance of this grant for the community's health and prosperity. Funds from the brownfield grant will facilitate the identification of additional brownfield sites that can be remediated to further address health and welfare issues that plague the target area's sensitive populations.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Target-area sensitive populations suffer from an increased number of health conditions including **heart disease, asthma, and cancer**. The EJ Screen Report shows the target area is in the **90th percentile for respiratory Hazard and Diesel Particulate Matter** in the US and **95th percentile for traffic proximity**, which compounds health issues (asthma and cancer) associated with the priority brownfield sites and their potential contaminants. Breast and colon cancer rates are higher in the City when compared to the county: breast cancer 164.0 and colon 39.5 per 100k in the City compared to the county rates 140.5 (breast) and 37.9 (colon) per 100k. Within the county (**target-area health data not available**), 1 in 14 adults (6%) have asthma and 1 in 11 children (9%) have asthma. Asthma rates within the county have risen over the last decade for both Hispanic and African American children.<sup>3</sup> EJ Screen Report data shows target-area residents are at a higher risk for heart disease and asthma (5.6 and 9.8 per 100k) than those in the rest of the state (5.2 and 9.5 per 100k). The CEJST shows the **weighted percent of people in the target area told they have asthma is in the 49th percentile**.<sup>2</sup> These health issues are also compounded due to the priority sites' proximity to Superfund, hazardous waste, and Risk Management Program (RMP) sites. The target area is ranked in the **95th percentile for proximity to Superfund sites, 99th percentile for proximity to hazardous waste sites, and 96th percentile for proximity to RMP sites**.<sup>2</sup> Both priority sites are anticipated to contain VOCs, SVOCs, OCPs, and PCBs that all contribute to the compounded health risks within the target area. Addressing brownfield sites and eliminating these pollutants will ensure that residents are protected from hazardous substances in their drinking water, soil, and local air.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: The target area sees elevated rates of heart disease, asthma, and cancer along with higher rates of poverty. The EJ Screen Report highlights significant respiratory hazards, diesel particulate matter (90th percentile), and traffic proximity (95th percentile), exacerbating health issues linked to the Carson Housing Authority property and the SyWest Development site.<sup>2</sup> The proximity to Superfund, hazardous waste, and RMP sites heightens risks, with the target area ranking extraordinarily high in these categories. Data from the EJ Screen Report emphasizes elevated risks of heart disease and asthma, while the CEJST reveals a high asthma diagnosis rate. Both priority sites are expected to contain harmful compounds, contributing to heightened health risks. Addressing brownfield sites is not just a necessity; it's a crucial step toward rectifying systemic environmental injustices. In addition to the health hazards that plague the community, the crime rate in Carson is considerably higher than the US average, with a crime rate 78% higher than the rest of the cities in the state.<sup>4</sup> Furthermore, the target area has a higher crime rate than that of the rest of the city. This is likely

<sup>3</sup> County of Los Angeles Public Health – Asthma Coalition

<sup>4</sup> Neighborhood Scout – Target Area





attributed to the city’s high unemployment, high poverty rates, and lack of essential resources such as affordable housing. Abandoned target-area properties, including the Carson Housing Authority and SyWest Development sites, have triggered a chain of negative consequences, including **decreased taxable revenue, decreased property values, reduced ability to market properties for redevelopment, and environmental justice issues such as low-income, high unemployment, substandard housing, and distressed neighborhoods (due to their proximity to Superfund, hazardous waste, and RMP sites)**, that directly impact the underserved residents. The EPA EJ Screen Report shows the target area in the 93rd percentile for people of color, 51st percentile for low income, and 74th for unemployment in the nation.

(b) Advancing Environmental Justice: The abundance of neglected target-area properties has impeded economic growth and prosperity for sensitive populations, evident in the area’s remarkably low per capita income (\$28,564), high unemployment rate (8%), and elevated poverty rates (12%).<sup>2</sup> Over time, these negative environmental impacts have deterred potential investors, leaving dilapidated buildings vacant and deteriorating. The EPA Brownfield Grant Program offers a pathway to alleviate and even reverse these environmental threats through identification, assessment, and remediation efforts. This initiative brings renewed vitality and business opportunities to the area, dispelling uncertainties for potential investors. The proposed transformation of the former SyWest site into a grocery retailer directly addresses the accessibility gap to healthy food options, while the redevelopment of the Carson Housing Authority Site (formerly a gas station) into affordable housing tackles both unemployment and substandard housing challenges—integral components of the Biden Administration’s Justice40 Initiative. Addressing these environmental justice concerns lays the foundation for redevelopment, creating space for new businesses in revitalized commercial areas and elevating overall living standards. While none of the proposed redevelopment projects outlined in this grant application will result in the displacement of residents, the City will implement strategies to proactively prevent or minimize the possibility of any future displacement. The envisioned revitalization plan for the priority sites and the broader target area promises to enhance the health and well-being of sensitive populations, simultaneously alleviating numerous environmental and socioeconomic justice issues that have long afflicted this underserved community.

**b. Community Engagement i. Project Involvement & ii. Project Roles:**

Name of Org.	Point of Contact	Specific involvement in the project or assistance provided
California State University, Dominguez Hills (CSUDH)	Mike Williams 310-701-5795 micwilliams@csudh.edu	CSUDH supports the local community with career development workshops and initiatives to support small businesses and collaborates with local organizations on research projects that address community issues. Mr. Williams will assist with <b>future reuse planning and community outreach/education.</b>
Los Angeles County Chief Executive Office, Economic Development and Affordable Housing Division (LAC CEO)	Robert Moran 213-974-1130 rmoran@ceo.lacounty.gov	The LAC CEO is charged with directing all economic development efforts within the city, ensuring there is economic growth in the region specifically focused on disadvantaged community residents. The LAC CEO will assist with <b>site identification and prioritization and future reuse planning.</b>
Carson Chamber of Commerce (COC)	Barry Waite, President barrywaite@carsonchamber.com	The COC <b>501(c)(6)</b> nonprofit serves Carson and the surrounding areas in Los Angeles County in business, economic development, tourism, and education. The COC will assist in <b>site identification and marketing assessed sites to interested developers for revitalization.</b>
Dignity Health Sports Park (DHSP)	Katie Pandolfo, General Manager 310-630-2054 kpandolfo@aegworldwide.com	The DHSP serves Carson and the surrounding areas in Los Angeles County as a state-of-the-art athletic facility and stadium, bringing business, economic development, tourism, and physical education to the city. The DHSP will assist in <b>site identification and community outreach/education.</b>



Boys and Girls Clubs of Carson (BGCC)	Diana Medel, Director of Strategic Partnerships 310-987-2854 dmedel@bgccarson.org	The BGCC serves the city by providing programs that promote leadership skills, cultural awareness, and career preparation for the city’s youth. The BGCC will assist in <b>site identification and community outreach/education</b> .
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iii. **Incorporating Community Input:** The City informed the public of its intent to pursue an EPA Brownfield Assessment Grant for the target area during the City’s Economic Development Commission (EDC) meeting on October 5, 2023, and at the regular City Council meeting held on October 17, 2023. Carson recognizes that collaboration with the community is pivotal for a successful Brownfield Program. The City will facilitate connections between residents and community organizations to foster meaningful engagement. Residents and community organizations are intimately familiar with their surroundings and needs and will play a central role in identifying potential brownfield sites. The City will create a Community Involvement Plan (CIP) detailing engagement activities, event schedules, project context, and key stakeholders. The CIP will be accessible at City Hall and on the City’s website.

The City will engage with local channels and review suggestions and potential concerns provided by community members during quarterly meetings. Comments and input will be assessed by the Brownfield Project Team, with minutes documenting all suggestions and shared information available on the City’s Brownfield Program webpage. At quarterly meetings, time will be provided to discuss resident concerns and potential solutions. City staff will respond to all comments and concerns via social media and, if needed, contact residents individually within one week of receipt. The Brownfield Project Team will maintain an inventory of suggested sites that are reviewed routinely and updated at each quarterly meeting. The community and Project Team will collaborate to prioritize sites based on community needs and program goals, especially those benefiting sensitive populations. The City’s CIP will use various media channels. Updates will be shared on the City’s Facebook page and Brownfield Program webpage. Signage will be placed in government buildings, and press releases and local newspapers will be used to further disseminate Brownfield Project information. Updates will also be communicated through City Council meetings, community education sessions, and charrettes/visioning sessions. All pertinent materials, along with the contact information of the City’s Brownfield Program Team, will be available on the City’s brownfield webpage. Translation services will be provided for the City’s Asian and Hispanic populations at the meetings and on announcements, flyers, and brochures. The City will also hold virtual meetings and will utilize its online platforms to engage the community for members that are unable to attend in-person events.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Description of Tasks/Activities and Outputs:**

<b>Task 1: Outreach</b>	
i.	<i>Project Implementation:</i> The City’s Brownfield Project Director will develop a Community Involvement Plan (CIP), outreach materials, project website, and social media posts with the assistance of the environmental contractor (EC). Staff will lead the community meetings to keep the public informed about project plans/updates. Supplies budgeted for the printing of outreach materials, office supplies, and software to manage the grant.
ii.	<i>Anticipated Project Schedule:</i> CIP created in 1 <sup>st</sup> quarter of Year 1. Community meetings held 1 <sup>st</sup> and 3 <sup>rd</sup> quarters (Years 1–3) and 1 <sup>st</sup> quarter of Year 4. Website and outreach materials created in the 1 <sup>st</sup> quarter and posted throughout the grant.
iii.	<i>Task/Activity Lead:</i> City: John Raymond, Assistant City Manager, Economic Development Brownfield Project Director
iv.	<i>Outputs:</i> CIP, Brownfield Website, 7 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports.
<b>Task 2: Site Inventory</b>	



i.	<i>Project Implementation:</i> The City’s Brownfield Project Manager will work with target-area residents during community meetings to create a thorough site inventory for assessment. Abandoned and underused properties identified by target-area residents will be researched further by City staff using the property appraiser’s website. Once a list is compiled, the EC will work with City staff to create an evaluation ranking tool, with the help of residents, to determine the order in which the sites will be addressed.
ii.	<i>Anticipated Project Schedule:</i> The community meeting held in the 1 <sup>st</sup> quarter of Year 1 will continue the preliminary inventory process that began with this application. The evaluation ranking process will take place in the 2 <sup>nd</sup> quarter and continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> City: James Nguyen, Special Projects Manager, Brownfield Project Manager
iv.	<i>Outputs:</i> Evaluation Ranking Tool, Site Inventory List
<b>Task 3: Assessment</b>	
i.	<i>Project Implementation:</i> The EC will conduct Environmental Site Assessment (ESA) activities at sites selected and ranked through the Site Inventory Task, starting first with the two priority sites listed in this application. ASTM- AAI compliant Phase Is; Generic Quality Assurance Project Plan (QAPP); Phase IIs which will include the site-specific (SS)-QAPP will all be conducted under this task. Prior to assessment, site access agreements and property eligibility determinations approval will be obtained.
ii.	<i>Anticipated Project Schedule:</i> Assessment activities begin in 2 <sup>nd</sup> quarter and continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> The City will oversee the work of the EC. James Nguyen, Special Projects Manager, Brownfield Project Manager.
iv.	<i>Outputs:</i> 16 Phase I ESAs, 1 Generic QAPP, 9 Phase II ESAs including SS-QAPP, Site Access Agreements and Property Eligibility Determinations.
<b>Task 4: Remediation/Reuse Planning</b>	
i.	<i>Project Implementation:</i> For projects identified for cleanup, the EC will prepare the Analysis for Brownfields Cleanup Alternatives (ABCA) and/or Cleanup Plans. Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs, and determining site appropriate remediation and/or reuse planning to reduce health/environmental risks. The EC will assist the City in hosting charrettes/visioning sessions for key properties.
ii.	<i>Anticipated Project Schedule:</i> Plans & Charrettes begin in the 6 <sup>th</sup> quarter and will continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> The City will oversee the work of the EC: John Raymond, Assistant City Manager, Economic Development, Brownfield Project Director
iv.	<i>Outputs:</i> 8 ABCAs, 2 Vision Sessions/Charrettes
<b>Task 5: Programmatic Support</b>	
i.	<i>Project Implementation:</i> The City will lead this task to provide programmatic support to the Brownfields Grant project and will procure an EC to assist as needed. The City’s Brownfield Finance Director oversees grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The City of Carson will complete ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. The City staff travel budget allows for two staff to attend three national/regional/grantee brownfield training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1 <sup>st</sup> quarter, and Quarterly Reporting begins in the 2 <sup>nd</sup> quarter and continues through the grant. Annual Reporting and Forms created in the 5 <sup>th</sup> , 9 <sup>th</sup> , and 13 <sup>th</sup> quarters and during final closeout.
iii.	<i>Task/Activity Lead:</i> City: Hnin Phyu, Accounting Manager, Brownfield Finance Director
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Annual Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend three conferences.

**b. Cost Estimates:** Below are the anticipated cost estimates for this project based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks. The budget for this project includes personnel, travel, supplies, and contractual costs only. **Sixty-nine percent (69%) of the budget will be spent on site-specific work** through the Assessment Task. **Personnel pay rates are at an average of \$90**, which includes the City’s burden rates. No participant support costs or subawards are anticipated.

**Task 1 Outreach:** Contractual: Community Involvement Plan \$500 (4hrs x\$125), Assistance with 1 Community Education Meeting \$1,500 (12hrs x \$125). Personnel: Preparation of CIP \$4,950



(\$90 x 55hrs); Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$1,220 (\$90 x 13.5hrs); Community Meetings \$6,300 (\$900 per meeting; \$90 x 10hrs per meeting). Supplies: Outreach Supplies (software, printouts) \$1,480. **Task 2 Site Inventory**: Contractual: Assistance with Brownfield Site Inventory and Evaluation Ranking Tool Creation \$2,000 (16hrs x \$125). Personnel: Site Inventory & Evaluation Ranking Process \$8,010 (\$90 x 89hrs). **Task 3 Assessment**: Contractual: 16 Phase I ESAs \$4,500 each for a total of \$72,000; 1 Generic QAPP \$5,500; 9 Phase II ESAs including SS-QAPP at \$29,000 each for a total of \$261,000. Personnel: Report Review and overall task management: \$9,990 (\$90 x 111hrs). **Task 4 Remediation/Reuse Planning**: Contractual: 8 ABCAs \$9,000 for a total of \$72,000; 2 Vision Sessions/Charrettes \$7,000 (\$3,500/meeting). Personnel: 2 Vision Sessions \$6,570 (\$90 x 73hrs per event prep and delivery); ABCA Review \$1,440 (2hrs per report x 8 @\$90/hr). **Task 5 Programmatic Support**: Contractual: Document review and minor support with Programmatic Support for the four-year grant period \$4,000 (32hrs x \$125). Personnel: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period including reporting to governing bodies including procurement, contracting, and budget authorization \$21,060 (\$90 x 234hrs). Travel: Two staff to attend 3 conferences \$12,000 (flights at \$800, hotel 3 nights at \$300/night, incidentals and per diem at \$100 per day [3 days] x 2 attendees x 3 events). The City will not seek any direct/indirect administrative costs outside the tasks described herein; therefore, the direct/indirect administrative costs will not exceed 5% of total requested funds.

Category	Tasks					Totals
	Outreach	Site Inventory	Assessment	Remediation/Reuse Planning	Programmatic Support	
Personnel	\$ 13,950	\$8,010	\$9,990	\$8,010	\$21,060	\$61,020
Travel					\$12,000	\$12,000
Supplies	\$1,480					\$1,480
Contractual	\$2,000	\$2,000	\$338,500	\$79,000	\$4,000	\$425,500
<b>Total</b>	<b>\$17,430</b>	<b>\$10,010</b>	<b>\$348,490</b>	<b>\$87,010</b>	<b>\$37,060</b>	<b>\$500,000</b>

**c. Plan to Measure and Evaluate Environmental Progress and Results:** To ensure this EPA Brownfield Project is on schedule, the City’s internal Brownfields Team, which will include the EC, will meet quarterly to track all **outputs identified in 3.a.** using an Excel spreadsheet and will report all progress in fulfilling the scope of work, goals, and objectives to the EPA via quarterly reports. In addition, project expenditures and activities will be compared to the projects schedule to ensure the grant project will be completed within the four-year time frame. Site-specific information will be entered and tracked in the ACRES database. The outputs to be tracked include the number of neighborhood meetings, public meetings, meetings with community groups and community partners, environmental assessments, ABCAs, and cleanup redevelopment plans. The outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not being completed in an efficient manner, the City has countermeasures in place to address this problem. The City will make monthly calls to its EPA Project Officer and, if needed, will create a Corrective Action Plan to get the project back on schedule.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability** i. Organizational Capacity, ii. Organizational Structure, & iii.

Description of Key Staff: The City of Carson operates under a Mayor-Council form of government. The City Council is comprised of five members and is the legislative and policy-making body of City government. The City is partnering with the Economic Development Commission of Carson to assist with community outreach as members of this commission comprise of community stakeholders and leaders. In 2022, this current City Brownfields Project



Team applied to the State’s ECRG funding for a site investigation and completed the grant within 1 year (1 year ahead of schedule) as provided in the letter of support provided by DTSC. The Team, described below, and their supporting staff are more than adequate and capable of successfully managing this Brownfield Assessment Grant. **Mr. John Raymond**, the City’s Assistant Manager of Economic Development, will serve as the **Brownfield Project Director**. Mr. Raymond has served in his position for nearly eight years and holds extensive expertise in managing economic development programs, including affordable housing initiatives, Community Development Block Grants (CDBG), and Capital Improvement Projects across multiple cities. He is also the current Executive Director of the Carson Reclamation Authority and is responsible for the remediation of the City’s former 157-acre landfill. Mr. Raymond will be the primary point of contact for the project and will be responsible for the overall management of the grant, including directing team members. **Mr. James Nguyen**, the City’s Special Projects Manager, will serve as the **Brownfield Project Manager**. Mr. Nguyen has served in this position for five years and has over 10 years of public sector experience in community and economic development. Mr. Nguyen currently manages the city’s real property portfolio and brownfields funding program. Mr. Nguyen will assist Mr. Raymond in the day-to-day tasks involved with this project. **Ms. Hnin Phyu**, the City’s Accounting Manager, will serve as **Brownfield Finance Director**. Ms. Phyu has served in this position for two years and has over seven years of experience in accounting in both the public and private sectors. She has also implemented several new financial systems and processes that have improved the efficiency and effectiveness of the Finance department. She will be responsible for managing the finances of this EPA Grant and ASAP.gov drawdowns. An EC will handle the technical and reporting portions of this project.

iv. Acquiring Additional Resources: The City will procure a qualified environmental contractor and subcontractors to assist with technical and reporting aspects of the Brownfield Community-wide Assessment. Job opportunities to provide redevelopment services will be posted in the community, and preference will be granted to local contractors providing services in the community and employment of residents for redevelopment of the target areas. Procurement procedures will comply with both the local contracting and procurement process and also with EPA requirements for “Professional Service,” including 2 CFR §§ 200 and 1500.

**b. Past Performance and Accomplishments** i. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments: The City was the recipient of three previous assessment grants: 1999 Assessment Grant in the amount of \$200,000; 2000 Revolving Fund Grant in the amount of \$500,000; and 2002 Assessment Grant for Petroleum in the amount of \$200,000. As these grants were awarded over twenty years ago, the City staff assigned to oversee and manage the grants are no longer employed by the City. The City’s Brownfield Team provided information that was to the best of their knowledge regarding the City’s past Brownfields Grant performance. According to City records, a total of 18 Phase I Environmental Site Assessments (ESAs) and 18 Phase II ESAs were conducted, and 3 Quality Assurance Project Plans (QAPPs) were prepared between 1999 and 2003. Some of these past ESAs/QAPPs resulted in the successful redevelopment of brownfield sites.. (2) Compliance with Grant Requirements: The City has a history of compliance with grant work plans, schedules, and terms and conditions. For the 1999, 2000, and 2002 Assessment Grants, the City outlined its objectives, budget, and tasks within its QAPPs for each grant. The City successfully executed the objectives of each QAPP and submitted reports in a timely manner. Mr. Raymond, along with the Brownfield Project Team, is skilled in project management and will monitor all grant activities to ensure compliance with all financial reporting requirements.



CITY OF CARSON

**City of Carson, CA  
FY24 Brownfields Assessment Grant  
Threshold Criteria**



## Threshold Criteria

### 1. Applicant Eligibility

- a. The City of Carson, California, is eligible to apply for the EPA Brownfields Community-wide Assessment Grant as a unit of local government as defined under 2 CFR § 200.64.
- b. The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

### 2. Community Involvement

The City informed the public of its intent to pursue an EPA Brownfield Assessment Grant for the target area during the City's Economic Development Commission meeting on October 5, 2023, and at the regular City Council meeting held on October 17, 2023. Carson recognizes that collaboration with the community is pivotal for a successful Brownfield Program. The City will facilitate connections between residents and community organizations to foster meaningful engagement. Residents and community organizations are intimately familiar with their surroundings and needs and will play a central role in identifying potential brownfield sites. Once awarded, the City will create a Community Involvement Plan (CIP) detailing engagement activities, event schedules, project context, and key stakeholders. This information will be accessible at City Hall and on the City's website.

To pinpoint potential target-area brownfield sites, the City will engage with local channels and review suggestions and potential concerns provided by community members during quarterly meetings. Comments and input will be assessed by the Brownfield Project Team, with minutes documenting all suggestions and shared information available on the City's Brownfield Program webpage. At quarterly meetings, time will be provided to discuss resident concerns and potential solutions. City staff will respond to all comments and concerns via social media and, if needed, contact residents individually within one week of receipt. The Brownfield Project Team will maintain an inventory of suggested sites that will be reviewed routinely and updated at each quarterly meeting. The community and Project Team will collaborate to prioritize sites based on community needs and program goals, especially those benefiting sensitive populations.

The City's CIP will use various media channels. Updates will be shared on the City's Facebook page and Brownfield Program webpage. Signage will be placed in government buildings, and press releases and local newspapers will be used to further disseminate Brownfield Project information. Updates will also be communicated through City Council meetings, community education sessions, and charrettes/visioning sessions. All pertinent materials, along with the contact information of the City's Brownfield Program Team members, will be readily available on the City's brownfield webpage, facilitating direct community engagement.

### 3. Expenditure of Existing Grant Funds

The City of Carson affirms it does not have an active EPA Brownfields Assessment Grant or Multipurpose Grant.

### 4. Contractors and Named Subrecipients

Not Applicable.