

## NARRATIVE INFORMATION SHEET

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1. Applicant Identification  
City of South Gate  
8650 California Avenue  
South Gate, CA 90280
2. Funding Requested
  - a. **Grant Type:** Single Site Cleanup
  - b. **Federal Funds Requested:** \$500,000
3. Location
  - a. City of South Gate
  - b. Los Angeles County
  - c. State of California
4. Property Information  
Alma Townhomes  
7916 Long Beach Boulevard  
South Gate, CA 90280
5. Contacts
  - a. **Project Director**  
Ms. Carol Averell, Housing Manager  
8650 California Avenue  
South Gate, CA 90280  
Email: cavererl12@sogate.org  
Phone Number: (323) 563-9535
  - b. **Highest Ranking Elected Official**  
Honorable Mayor Maria del Pilar Avalos  
8650 California Avenue  
South Gate, CA 90280  
Email: mpavalos@sogate.org  
Phone Number: (323) 563-9543
6. Population  
92,726
7. Other Factors

Information on the Other Factors	Page #
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	18
The reuse of the proposed cleanup site will incorporate energy efficiency measures.	18-19

8. Releasing Copies of Applications  
No confidential information is contained in these materials.

# NARRATIVE

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## 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALATION

- **Target Area and Brownfields**
  - i. **Overview of Brownfield Challenges and Description of the Target Area**

In the summer of 1769, a group of Spanish explorers set out from the coast of San Diego to explore the uncharted territory between San Diego and the Bay of Monterey. Francisco Lugo was a cavalry corporal for the King of Spain and an important figure among the early Spanish settlers of the region. In 1810 the King of Spain granted 11 square leagues to Francisco's son, Don Antonio Maria Lugo, in appreciation for his father's service to the crown which included the Gabrielino village areas now known as the City of South Gate (the "City"). The Land Grant was handed down from generation to generation, divided among offspring and eventually parceled and sold to people outside the Lugo family. Before the end of the 1870's, much of the original land grant had been replaced by 40-acre tracts. By 1880, cattle raising had been replaced by agriculture as the most important local industry. In autumn of 1922, a petition for incorporating the town of South Gate was circulated by I.W. Lampman. An election was held on January 2, 1923, to determine the will of the people. On January 20, 1923, the Board of Supervisors formally declared the incorporation of the "City of South Gate."

South Gate is now the 19th largest city in Los Angeles County, California, and includes over 7.4 square miles. The City is located 7 miles southeast of Downtown Los Angeles. The 2010 United States Census reported that South Gate had a population of 94,396. The racial makeup notes that 94.8% or 89,442 are Hispanic or Latino of any race. The average household size is large at 4.05. The City had a median household income of \$52,321, with 17.2% of the population living below the federal poverty line. For people ages 25 and over, 56.7% had a high school degree or higher while 9.4% had a bachelor's degree or higher.

The subject property is approximately 17,896 square feet located at 7916 Long Beach Boulevard (APNs 6202-010-900 and 6202-010-901) (herein referred to as the "Site"). The Site includes 5,850 square feet of one-and-two story structures originally constructed in 1950. It was formally an adult education school, but it is currently closed and used for storage.

Located at one of the entrances into the City at the northeast corner of Long Beach Boulevard and Cudahy Street, the Site is adjoined by commercial and single-family residential uses to the immediate north and east in the unincorporated Los Angeles County community of Walnut Park; commercial/retail uses are located immediately south and west of the parcel within the City limits. Land uses in the greater Site area include commercial/retail to the north, commercial/retail and residential to the south, commercial/retail to the west across Long Beach Boulevard, and residential to the east.

The City of South Gate's General Plan designates the Site as urban neighborhood (UN) zone. This zone is described as: *"intended for areas adjacent to or surrounding major community corridors to provide retail and service uses in a more automotive-oriented setting and to provide buildings that transition to adjacent established neighborhoods. The UN zone promotes the blending of housing, retail and services, office, and civic uses. Physical Character. The physical environment should be characterized by medium- to high-density housing, occasionally accented by neighborhood-serving retail, office, and restaurants. Urban, pedestrian-oriented townhomes and rowhomes are envisioned along Long Beach Boulevard..."* The Site, if awarded the clean-up funds, is designed as envisioned in the General Plan and represents a unique opportunity to provide affordable housing in this attractive new addition at an entrance to the City.

### ii. Description of the Proposed Brownfield Site

Based on available information, it is thought that the current building at the Site was used for an auto dealership and was constructed in 1952 by Lindt-Wilson Motors. Prior to 1952, the Site appeared to be occupied by a service station. The City of South Gate Redevelopment Agency obtained ownership of the subject site in 1979. Freedom Ford leased the site from the early 1980's until March 1991. The site contained a 7,500-gallon gasoline and a 550-gallon waste oil underground storage tank (UST), which were removed by Hekimian and Associates of Huntington Beach and granted closure (Permit 3909B) by the Los Angeles County Department of Public Works in 1988. According to the permit, a 1,000-gallon gasoline UST was also listed on the permit for removal.

Throughout its history, there were various testing events and additional remediation on the Site. In March 1993, the City through SCS, performed and included advancing 19 exploratory borings. Analytical data from soil samples

collected in the vicinity of the former gasoline UST indicated that the 15 to 25-foot soil depths were impacted with TPH at concentrations up to 18,200 mg/kg. Results from samples collected in the service pit within the building indicated detectable concentrations of fuel hydrocarbons including TRPH, benzene, toluene, ethylbenzene, and total xylenes (BTEX). Soil samples collected in the vicinity of the hydraulic lifts in the building yielded TRPH concentrations ranging from 1,420 mg/kg to 16,900 mg/kg. At the completion of the March 1992 investigation, the lateral limits of petroleum-impacted soil detected south, east, and west of the former UST had not been defined. Removal of the wastewater clarifier, hydraulic lifts, associated contaminated soils, and soil beneath the service pit was recommended.

In May 1993, SCS performed another Phase II investigation, which consisted of advancing five exploratory borings, three of which were converted into groundwater monitoring wells. Groundwater samples collected from the wells detected trace concentrations of toluene and total xylenes. Based on this and previous soils data, it was concluded that the western and eastern extent of contamination had been defined.

In August through September 1997, SCS oversaw the removal of seven hydraulic lifts, one clarifier, and a reported 83 tons of petroleum-impacted soils. Remaining soils in the excavations were below Water Board guidelines of 1,000 mg/kg TPH in the C13 to C22 range. The Los Angeles Regional Water Quality Control Board ("Water Board") requested additional soil investigation in the vicinity of previous borings BH-1, BH-2, BH-9, BH-10, BH-11, BH-12, BH-27, BH-28, and MW-3 to better define the vertical and lateral extent of soil contamination.

According to the Site Closure Report prepared by SCS, the extent of hydrocarbon-impacted soil at the Site had been defined. SCS concludes that the "impacted soil appears to be confined to the area of the former UST in the southwestern portion of the Site. Significantly impacted soil was reportedly limited to a depth of 20 feet bgs. Groundwater samples were found to contain no contaminants of concern."

On January 10, 2012, the LARWQCB sent a letter to the City of South Gate requesting submittal of a Workplan to conduct a subsurface soil vapor investigation, the purpose of which was to determine if residual VOCs posed a potential human health risk. On May 4, 2018, Geocon performed a soil vapor survey that included advancing 10 soil vapor probes (identified as SV-1 through SV-10) within the Site structure and parking lot area. The probes were set at five (5) feet bgs and soil vapor samples were collected and analyzed for VOCs (including chlorinated solvents) via EPA Method 8260B. Tetrachloroethene (PCE) was detected in four of the 10 soil vapor samples and at concentrations ranging from 0.10 micrograms per liter ( $\mu\text{g/l}$ ) (SV-5) to 0.60  $\mu\text{g/l}$  (SV-9). No other VOCs were detected above the laboratory reporting limits.

Geocon compared the PCE concentrations to applicable screening levels to further evaluate the potential for vapor intrusion into the Site structure. A residential and commercial/industrial PCE soil vapor screening level was calculated to be 0.46  $\mu\text{g/l}$  and 2.0  $\mu\text{g/l}$ , respectively. None of the detected PCE soil vapor concentrations exceeded the commercial/industrial screening level of 2.0  $\mu\text{g/l}$ , while one soil vapor sample (SV-5 at 0.60  $\mu\text{g/l}$ ) exceeded the residential screening level. At this time, the site remains essentially vacant and used for storage purposes only.

- **Revitalization of the Target Area**
  - i. **Reuse Strategy and Alignment with Revitalization Plans**

The City's General Plan "creates a new vision that will build a better tomorrow for future generations. It will create opportunities for growth and advancement, opportunities for our families to grow stronger, opportunities for businesses to thrive and prosper, and opportunities for our institutions to enhance the quality of life in the community." The creation of the General Plan includes extensive public engagement activities and included the creation of Urban Neighborhood Zone as one the top priorities for residents.

As part of the vision for revitalization, in April 2021 the City declared the property surplus and available for purchase. The reuse strategy parameters were set by the Urban Neighborhood zone guidelines. Azure Community Development prepared a response for development of the property consistent with that zoning and to transform the property into much-needed affordable housing.

- ii. **Outcomes and Benefits of Reuse Strategy**

The City is considered a built-out community and has an urgent need for affordable housing. The South Gate median household income is approximately \$55,000, which is considered Very Low Income for a family of four in Los Angeles County under federal and state standards. Further, the California Department of Housing and Community Development (HCD) recently completed the Regional Housing Needs Assessment ("RHNA") for the 8-year period beginning in

October 2021, which determines the City's next ("6th Round") fair share allocation of housing production. In March 2021, HCD approved the 6th Round Final RHNA Allocation Plan allocating 8,282 housing units to South Gate, of which 994 would need to be affordable to low-income households (earning less than 80 percent of the County median income). Therefore, redevelopment of the Site with affordable housing would provide maximum benefit to the community.

The Reuse Strategy proposes to demolish the existing building and construct eleven (11) three-story townhomes, including ten (10) three-bedroom units and one (1) four-bedroom unit. Each unit would have a private garage, and access to shared amenities including a small outdoor space and shared grills. The eleven (11) townhomes will be sold to eligible Low-Income households earning no more than 80% of Los Angeles County area median income ("AMI") at an affordable housing cost as defined in Section 50052.5 of the Health and Safety Code, with a covenant requiring their affordability for not less than 55 years. As a condition to closing escrow, the Purchaser must enter into an Affordable Housing Loan Agreement with the City that restricts the sale of the townhomes to eligible low-income households at an affordable housing cost, imposes restrictions on the Purchaser's ability to transfer the Property, requires all purchasers of the affordable units to enter into agreements with City ensuring subsequent transfer of units to low income households, and establishes townhome occupancy and maintenance requirements. These units also incorporate green principles that include car charging infrastructure in garages for electric vehicles and zero-emission appliances. The units maximize 2035 energy efficiencies to minimize utility costs for buyers and ensure they do not incur costs when the State transitions to zero emissions.

The culmination of these revitalization efforts will improve the City's resiliency to climate change, especially in this under-served area of the city.

- **Strategy for Leveraging Resources**
  - i. **Resources Needed for Site Characterization**

If the Site needs additional investigation for the remediation efforts to proceed and if this grant is not awarded, the City and Azure Community Development may be eligible to seek funding through the California Department of Toxic Substances Control's Office of Brownfields Equitable Community Revitalization Grant (ECRG).

- ii. **Resources Needed for Site Remediation**

The City was able to dedicate resources towards site remediation under its former Redevelopment Agency, a taxing structure that has now been dissolved by the State of California. The remediation was never completed when the taxing agency was dissolved thus making the reuse of the Site infeasible despite its prominence as an entry into the City. This clean-up grant is critical to completing the remaining remediation and beginning the reuse of the Site.

- iii. **Resources Needed for Site Reuse**

The Reuse of the Site has been in process for two (2) years and includes the use of local, state and federal sources to make this important project possible. All remaining sources required for project revitalization are now secured and the only remaining source needed is this EPA clean-up grant.

NAME OF RESOURCE	IS THE RESOURCE FOR ASSESSMENT, REMEDIATION OR REUSE?	IS THE RESOURCE SECURED OR UNSECURED?	ADDITIONAL DETAILS ABOUT RESOURCE
1. HUD HOME Funds	Reuse	Secured	Federal CDBG funds awarded to the City of South Gate.
2. HCD Cal Home Funds	Reuse	Secured	State of California funds awarded to the City of South Gate, November 2023. Funds to be used as silent-second mortgages, \$200K per household.
3. City of South Gate	Reuse	Secured	City in escrow to sell the property for \$1.00 to facilitate the development of affordable housing.

**iv. Use of Existing Infrastructure**

Existing infrastructure available at the site includes electricity, telecommunications, stormwater drainage, water and sewer. The Revitalization of the Site includes infrastructure upgrades needed for water, sewer, and stormwater management. Natural gas service will not be used on the Site to advance all climate goals.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need**

**i. The Community’s Need for Funding**

As recent as 2016, the City of South Gate faced annual budget deficits and was challenged with deferred infrastructure improvements. The City has worked proactively to stem these budget issues to continue to deliver services to its disadvantaged community.

In addition, the City was able to acquire the Site and begin remediation with the use of Redevelopment Agency funds. The State of California has since dissolved Redevelopment Agencies and the properties held by them must be sold.

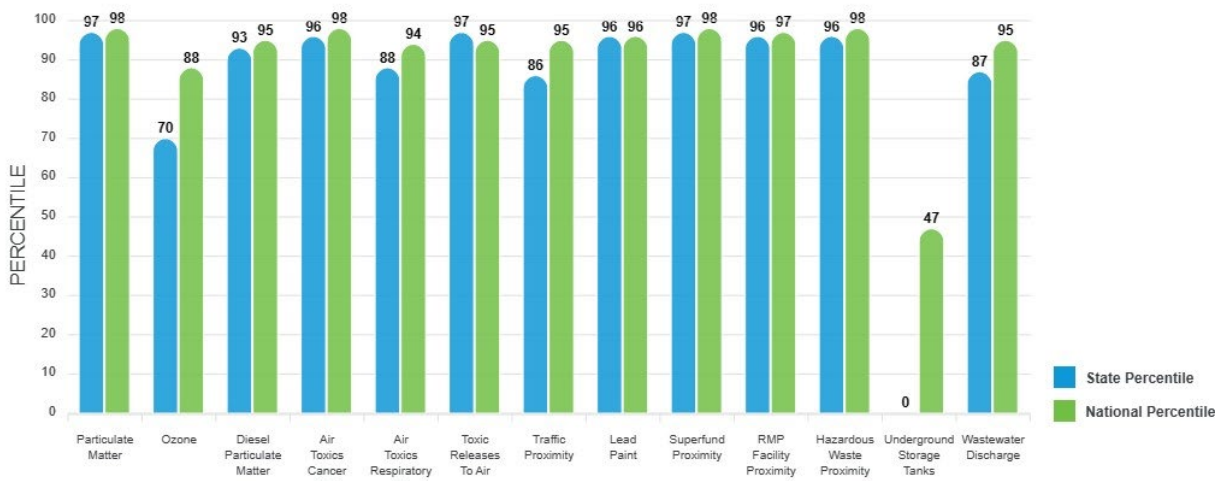
These combined issues have made it infeasible to develop brownfield impacted sites in the City. This grant is critical to revitalizing a major entrance into the City with much needed affordable housing.

**ii. Threats to Sensitive Populations**

The State of California has adopted the Community Air Protection Program (“CAPP”) through the California Air Resources Board to reduce exposure in communities most impacted by air pollution. In 2019, the City of South Gate has been formally included in the Southeast Los Angeles Community CAPP. Sources impacting this community include major freeways such as interstates 710 and 105, the Alameda Corridor, industrial facilities that routinely process chemicals, warehouses, manufacturers, auto body shops, and three Superfund sites. The Southeast Los Angeles (“SELA”) Community has a high cumulative exposure burden, a significant number of sensitive receptors, and census tracts that have been designated as disadvantaged communities. The community also includes a wide range of industrial facilities, including metal processing, surface coatings, auto body shops, rendering facilities, and warehousing that attracts heavy-duty truck traffic. DPM had the highest contribution to the community’s overall air toxics inventory. On-road and off-road mobile sources were the predominant sources of DPM, with the major contributors being heavy-heavy duty trucks, medium-heavy duty trucks, off-road diesel equipment, and trains. In this community, 1,3-butadiene is the second largest contributor, which is largely emitted from stationary sources and area sources in the chemical industry and plastics production.

In additional EPA’s EJ Screen Tool for the City of South Gate and the Site detail that it ranks much higher than State and Federal average in almost all the thirteen (13) measures. This community has a high need for investment in assessment and remediation.

**EJ INDEXES FOR THE SELECTED LOCATION**



Using the Climate and Economic Justice Screening Tool, the Site is within a disadvantaged census tract for purposes of Justice40.

## b. Community Engagement

There are many local organizations and groups that will be relevant to this project. Soliciting comments and input from these groups and the public is essential to the success of this project. To help coordinate these efforts, the stakeholders listed below will serve to provide insight on the project and its revitalization.

NAME OF ORGANIZATION	POINT OF CONTACT	SPECIFIC INVOLVEMENT IN PROJECT
1. Housing Manager	Carol Averell Caverell2@sogate.org (323) 563-9535	Project management of the site clean-up activities and revitalization.
2. City Council	Various	Regular project updates and reports at its public meetings.
3. Planning Commission	Various	Regular project updates and reports at its public meetings.
4. Los Angeles Regional Water Quality Control Board	David Young dyoung@waterboards.ca.gov (213) 576-6733	Project management of the site clean-up activities.
5. South Coast AQMD	Angela Shibata ashibata@aqmd.gov (909) 396-2737	Permitting and oversight for applicable remediation activities.

The City of South Gate's webpage will serve as the central repository for educational materials, project updates, notification of public meetings and events, reports and other materials related to the project. Additionally, the webpage will host a location for residents to submit questions and comments throughout the project implementation timeline.

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

### a. Proposed Cleanup Plan

The proposed cleanup activities to remediate the Site are outlined in Alternative #3 of the ABCA: Excavation with Offsite Disposal. Based on previous investigations, the residual contaminants remain appear to be between the surface level to 5 feet deep.

To address the residual soil contamination, demolition of the existing structures is required. Prior to demolition of the buildings, a Hazardous Building Material Survey must be completed. Abatement of asbestos, lead paint, and PCBs found at the site must be completed by an appropriately licensed remedial contractor prior to demolition of the building. Once the hazardous building materials have been abated, if any, and properly disposed of, site excavation work will commence.

Complete excavation may result in up to 7,300 tons of soil removal to be disposed of at a permitted soil recycling facility. Backfilling with clean soil and grading are also included in the remedial activities.

### b. Description of Tasks/Activities and Outputs

TASK/ACTIVITY: PROGRAM MANAGEMENT	
i.	<p>Project Implementation</p> <ul style="list-style-type: none"> <li>EPA-funded tasks/activities: Procurement and management of team to implement hazardous building material abatement measures, excavation and soil remediation ensuring compliance with federal, state, and local laws. Procurement of qualified environmental professionals to complete abatement measures, demolition, and soil remediation.</li> <li>Non-EPA grant resources needed: Project Team will include City of South Gate staff.</li> </ul>
ii.	Anticipated Project Schedule: Month 1 to 10

iii.	Task/Activity Lead: Project Manager to prepare final schedule, refine budgets, prepare request for proposals and bidding, prepare quarterly updates.
iv.	Outputs: Quarterly Update Reports and Contracts
<b>TASK/ACTIVITY: COMMUNITY OUTREACH</b>	
i.	Project Implementation <ul style="list-style-type: none"> <li>EPA-funded tasks/activities: Prepare printed materials needed for public outreach including posters and flyers used at public events and meetings, mailings used to inform residents of upcoming events and meetings, translation services for informational materials as needed.</li> <li>Non-EPA grant resources needed: Project Team will include City of South Gate staff.</li> </ul>
ii.	Anticipated Project Schedule: Month 1 to 10
iii.	Task/Activity Lead: Project Team to oversee ongoing updates to the Community. Communication to be provided through City public meetings, Community notices in English and Spanish, and social media.
iv.	Outputs: Collection of public comments, creation of informational materials in English and Spanish, flyers, website updates, posts to social media, meeting minutes, sign-in sheets.
<b>TASK/ACTIVITY: CLEANUP PLANNING</b>	
i.	Project Implementation <ul style="list-style-type: none"> <li>EPA-funded tasks/activities: Design plan for abatement, demolition, excavation, and soil remediation, as well as the creation of a Health Monitoring Plan.</li> <li>Non-EPA grant resources needed: Project Team will include City of South Gate staff.</li> </ul>
ii.	Anticipated Project Schedule: Month 1 to 4
iii.	Task/Activity Lead: Project Team will compile bidding documents and permitting to receive necessary regulatory approvals.
iv.	Outputs: Prepare a plan for abatement, demolition, excavation, and soil remediation, as well as the creation of a Health Monitoring Plan. Prepare Bid Package for site remediation activities.
<b>TASK/ACTIVITY: CLEANUP ACTIVITIES AND REPORTING</b>	
i.	Project Implementation <ul style="list-style-type: none"> <li>EPA-funded tasks/activities: The procured qualified firm will complete hazardous building material abatement, demolition, soil excavation and remediation. Materials will be delivered to a certified disposal facility and provide manifests documenting compliance. Provide oversight of sitework activities and provide weekly reports documenting progress. Provide required reports for the year of post monitoring activities.</li> <li>Non-EPA grant resources needed: Project Team will include City of South Gate staff.</li> </ul>
ii.	Anticipated Project Schedule: Month 5 to 10
iii.	Task/Activity Lead: Selected bidder to complete demolition, excavation and soil remediation. Monitor that permit requirements are met through the process.
iv.	Outputs: Final clean-up report. Grant reporting and final expenditure documentation.

**c. Cost Estimates**

	BUDGET CATEGORIES	PROJECT TASK (\$)				
		TASK 1	TASK 2	TASK 3	TASK 4	TOTAL
<b>DIRECT COSTS</b>	Personnel	\$ 6,250	\$ 6,250	\$ 6,250	\$ 6,250	\$ 25,000
	Fringe Benefits	\$ -	\$ -	\$ -	\$ -	\$ -
	Travel	\$ -	\$ -	\$ -	\$ -	\$ -
	Equipment	\$ -	\$ -	\$ -	\$ -	\$ -
	Supplies	\$ 500	\$ 500	\$ 500	\$ 500	\$ 2,000
	Contractural	\$ -	\$ -	\$ 24,000	\$ 16,700	\$ 40,700
	Construction	\$ -	\$ -	\$ -	\$ 375,000	\$ 375,000
	Other: Marketing Consultant	\$ 2,500	\$ 2,600	\$ 2,600	\$ 2,600	\$ 10,300
	Other: Permits	\$ -	\$ -	\$ 12,000	\$ 35,000	\$ 47,000
	<b>TOTAL DIRECT COST</b>	<b>\$ 9,250</b>	<b>\$ 9,350</b>	<b>\$ 45,350</b>	<b>\$ 436,050</b>	<b>\$ 500,000</b>
INDIRECT COST	\$ -	\$ -	\$ -	\$ -	\$ -	
<b>TOTAL BUDGET</b>	<b>\$ 9,250</b>	<b>\$ 9,350</b>	<b>\$ 45,350</b>	<b>\$ 436,050</b>	<b>\$ 500,000</b>	

<b><u>COST ESTIMATE DETAIL</u></b>
<b>TASK/ACTIVITY: PROGRAM MANAGEMENT</b>
This task will be led by staff at Azure Community Development, a 501c3. Azure's project management services will be compensated at no more than \$6,250 per Task. Other costs incurred in this Task include producing project information for the community at a total supply cost of \$500. And finally, this Task includes a third-party marketing consultant to produce on-going digital and video updates for the community.
<b>TASK/ACTIVITY: COMMUNITY OUTREACH</b>
This task will be led by staff at Azure Community Development, a 501c3. Azure's project management services will be compensated at no more than \$6,250 per Task. Other costs incurred in this Task include producing project information for the community at a total supply cost of \$500. And finally, this Task includes a third-party marketing consultant to produce on-going digital and video updates for the community.
<b>TASK/ACTIVITY: CLEANUP PLANNING</b>
This task will be led by staff at Azure Community Development, a 501c3. Azure's project management services will be compensated at no more than \$6,250 per Task. Other costs incurred in this Task include producing project information for the community at a total supply cost of \$500. And finally, this Task includes a third-party marketing consultant to produce on-going digital and video updates for the community.
This Task includes interface with the Water Board and their approval of the proposed clean-up plan. Their oversight requires a deposit or permit fee. Azure will also bid the environmental testing and remediation construction consultant to complete a remediation work plan. This cost is estimated at \$24,000 for this Task.
<b>TASK/ACTIVITY: CLEANUP ACTIVITIES AND REPORTING</b>
This task will be led by staff at Azure Community Development, a 501c3. Azure's project management services will be compensated at no more than \$6,250 per Task. Costs incurred in this Task also include producing project information for the community at a total supply cost of \$500. And finally, this Task includes a third-party marketing consultant to produce on-going digital and video updates for the community.
This Task includes continued oversight with the Water Board. Their oversight requires a deposit or permit fee. The demolition also requires permitting through the City of South Gate and AQMD. That cost is included in the \$35,000 budget in this Task.
Azure will oversee demolition and remediation with the selected bidder. This cost is estimated at \$16,700 for consulting and \$375,000 in hard or construction cost.



#### **d. Plan to Measure and Evaluate Environmental Progress and Results**

The City will track, measure, and report project performance through its quarterly reports, and website. Quarterly reports and internal project management tools will be used to ensure funds are expended appropriately in a timely and efficient manner. An established EPA approved work plan will guide project results and progress will be evaluated based upon major project milestones and anticipated project goals such as the volume of soil abated.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

##### **a. Programmatic Capability**

##### **i. Organizational Structure & ii. Description of Key Staff:**

The City of South Gate and Azure Community Development are experienced in the coordination and management of federal grants from social services and roadway improvements to large scale initiatives. Key members of the City team include Community Development Director Meredith Elguira and Carol Averell.

In addition, the Azure Community Development team has overseen the clean-up and development of eight (8) brownfield sites ranging from UST removal to regional metals facilities. Azure's President also currently serves as Chair of the Board of the South Coast Air Quality Management District and has the expertise to successfully complete this scope of work. Azure is currently an approved vendor of HUD for implementation of lead abatement work in Orange County.

Acquiring Additional Resources: The City of South Gate has a wealth of experience procuring contractors and resources for a variety of initiatives. The City has a strong relationship with regional organizations which specialize in project oversight, project completion and contractor procurement. The City has worked with several environmental consulting firms and has a strong relationship with regulators. Any additional professional expertise will be obtained following applicable federal and state public procurement guidelines.

##### **b. Past Performance and Accomplishments**

##### **i. Currently Has or Previously Received an EPA Brownfields Grant:**

The City was a successful grantee in the FY2022 U.S. EPA Brownfield Sites Assessment Program, receiving a total of \$500,000 for implementation between October 1, 2022, to October 31, 2025, Grant No. 98T43301. The City, specifically the Community Development Department, successfully pursued assessment activities in compliance with all grant requirements and completed all reporting obligations.

Compliance with Grant Requirements: The City has consistently addressed all grant requirements and deadlines during this Cooperative Agreements. This has included the completion of all required documents including work plans, community relations plans and outreach materials. All required reporting has been completed as required including quarterly reports, financial reports, ACRES property profiles and final/closeout reports. The City's Brownfields team consistently works closely with the EPA Project Officer to ensure compliance with all Grant Requirements and anticipates continuing this practice.

## THRESHOLD CRITERIA RESPONSES

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1. Applicant Eligibility  
The City of South Gate (the "City") is a municipal corporation of the State of California located in Los Angeles County.
2. The City has not been awarded a Cleanup Grant for the subject Site.
3. Site Ownership Information  
The property subject to this grant request is owned by the City of South Gate through a negotiated fee simple purchase in 1979 from Lindt-Wilson Motors Inc. The City held ownership until it was transferred by operation of law to its Successor Agency pursuant to the redevelopment dissolution in 2012. The City of South Gate meets the requirements for asserting an affirmative defense of CERCLA liability given the date of purchase.
4. Basic Site Information ("Site")  
Alma Townhomes  
Address: 7916 Long Beach Boulevard, South Gate, California, 90280
5. Status of History of Contamination at the Site  
The Site is a former auto body shop (formerly operated as Freedom Ford) and is known to have had an onsite leaking underground storage tank ("LUST"). In 1997, seven (7) hydraulic lifts, one clarifier and 83 tons of petroleum-impacted soils were removed. Remaining soil in excavation was below Los Angeles Regional Water Quality Control Board ("Water Board") guidelines. In 2012, the Water Board requested subsurface soil vapor investigation to determine if residual VOCs posed a potential for human health risk. The Site has remained underutilized to date.
6. Does the Site Meet the Definition of a Brownfield Site?  
Yes, the site meets the definition of a brownfield site and is not listed or proposed for listing on the National Priorities List. The Site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered by parties under CERCLA. And finally, the Site is not subject to the jurisdiction, custody, or control of the US government.
7. Description of the Environmental Assessment Conducted at the Site  
The Site has undergone prior environmental investigations to evaluate former land uses including a gasoline service station and automotive repair activities. The following technical documents and/or correspondence are available:
  1. SCS Engineers, October 2001, Additional Soil Investigation/Site-Wide Confirmation Sampling Workplan Former Freedom Ford Site, 7916 Long Beach Boulevard, South Gate, California.
  2. Los Angeles Regional Water Quality Control Board, January 2012, Request for Subsurface Soil Vapor Investigation Work Plan, City of South Gate Former Freedom Ford, 7916 Long Beach Boulevard, South Gate, CA.
  3. Los Angeles Regional Water Quality Control Board, August 2017, 2017-2018 Annual Estimation Letter for Site Cleanup Cost Recovery Program, City of South Gate Former Freedom Ford, 7916 Long Beach Boulevard, South Gate, CA.
  4. City of South Gate, April 2018, Response to January 10, 2012, Letter Request for Subsurface Soil Vapor Investigation Work Plan, 7916 Long Beach Boulevard, South Gate, CA.

5. Geocon West, Inc., 2018, Soil Vapor Survey, Former Freedom Ford, 7916 Long Beach Boulevard, South Gate, California.

The purpose of the investigations was to evaluate known or suspected releases from former USTs, a clarifier, a service pit, floor drains, hydraulic lifts, auto service bays, and visibly stained soils. It was reported that two USTs, seven hydraulic lifts, one clarifier, and a reported 83 tons of petroleum-impacted soil were removed from the Site as part of prior Site work.

According to SCS, preliminary investigation completed in November 1991 consisted of a regulatory records review, a geophysical survey and 25 exploratory borings. Certain soils in the vicinity of the former gasoline UST, the service pit, hydraulic lifts, and the clarifier contained detectable concentrations of total petroleum hydrocarbons (TPH) as gasoline and as total recoverable petroleum hydrocarbons (TRPH). TPH concentrations ranged from 10 milligrams per kilogram (mg/kg) to 18,000 mg/kg. Although a permit listed an additional 1,000-gallon tank at the Site, which was not mentioned in a 1988 UST closure report, no tanks were detected during a geophysical survey conducted during SCS's investigation. It was determined that the 1,000-gallon tank appeared to either have been removed or never existed.

A subsequent investigation by SCS in March 1992 was performed and included advancing 19 exploratory borings. Analytical data from soil samples collected in the vicinity of the former gasoline UST indicated that the 15 to 25-foot soil depths were impacted with TPH at concentrations up to 18,200 mg/kg. Results from samples collected in the service pit within the building indicated detectable concentrations of fuel hydrocarbons including TRPH, benzene, toluene, ethylbenzene, and total xylenes (BTEX). Soil samples collected in the vicinity of the hydraulic lifts in the building yielded TRPH concentrations ranging from 1,420 mg/kg to 16,900 mg/kg. At the completion of the March 1992 investigation, the lateral limits of petroleum-impacted soil detected south, east, and west of the former UST had not been defined. Removal of the wastewater clarifier, hydraulic lifts, associated contaminated soils, and soil beneath the service pit was recommended.

In May 1993, SCS performed another Phase II investigation, which consisted of advancing five exploratory borings, three of which were converted into groundwater monitoring wells. Groundwater samples collected from the wells detected trace concentrations of toluene and total xylenes. Based on this and previous soils data, it was concluded that the western and eastern extent of contamination had been defined.

In August through September 1997, SCS oversaw the removal of seven hydraulic lifts, one clarifier, and a reported 83 tons of petroleum-impacted soils. Remaining soils in the excavations were below Water Board guidelines of 1,000 mg/kg TPH in the C13 to C22 range. The Los Angeles Regional Water Quality Control Board ("Water Board") requested additional soil investigation in the vicinity of previous borings BH-1, BH-2, BH-9, BH-10, BH-11, BH-12, BH-27, BH-28, and MW-3 to better define the vertical and lateral extent of soil contamination.

According to the Site Closure Report prepared by SCS, the extent of hydrocarbon-impacted soil at the Site had been defined. SCS concludes that the "impacted soil appears to be confined to the area of the former UST in the southwestern portion of the Site. Significantly impacted soil was reportedly limited to a depth of 20 feet bgs. Groundwater samples were found to contain no contaminants of concern."

On January 10, 2012, the Water Board sent a letter to the City of South Gate requesting submittal of a Workplan to conduct a subsurface soil vapor investigation, the purpose of which was to determine if residual VOCs posed a potential human health risk. On May 4, 2018, Geocon performed a soil vapor survey that included advancing 10 soil vapor probes (identified as SV-1 through SV-10) within the Site structure and parking lot area. The probes were set at five (5) feet bgs and soil vapor samples were collected and analyzed for VOCs (including chlorinated solvents)

via EPA Method 8260B. Tetrachloroethene (PCE) was detected in four of the 10 soil vapor samples and at concentrations ranging from 0.10 micrograms per liter (µg/l) (SV-5) to 0.60 µg/l (SV-9). No other VOCs were detected above the laboratory reporting limits.

Geocon compared the PCE concentrations to applicable screening levels to further evaluate the potential for vapor intrusion into the Site structure. A residential and commercial/industrial PCE soil vapor screening level was calculated to be 0.46 µg/l and 2.0 µg/l, respectively. None of the detected PCE soil vapor concentrations exceeded the commercial/industrial screening level of 2.0 µg/l, while one soil vapor sample (SV-5 at 0.60 µg/l) exceeded the residential screening level.

8. Is the Site Required to be Enrolled in a State or Tribal Voluntary Response Program?

The Site is subject to an open Los Angeles Regional Water Quality Control Board (the "Water Board") case with oversight under File No. 0475B, Site ID. 2040191. The City, through its subrecipient, will enroll the cleanup plan for oversight. Additional soil vapor characterization may be required as the land use proposed is residential but can be performed before June 15, 2024. Verification from the Water Board is included as Attachment No. 1.

9. Information of Enforcement Onsite

There are no known ongoing or anticipated environmental enforcement or other actions related to the Site for which this Brownfields Grant funding is sought.

10. Property-specific Determination

A Property-specific Determination is not required for this Brownfields Grant request.

11. Cleanup Authority and Oversight Structure

The Cleanup will be overseen through the direct oversight from the Water Board. There is no indication based on site data collected that contaminants have migrated off-site nor that adjacent properties will need to be accessed. Groundwater samples were found to contain no contaminants of concern.

12. Community Notification Documents

An ABCA has been drafted and made available for public comment. A Community Notification Ad was posted to the City's website on October 26, 2023, and published in the Long Beach Press Publication on October 31, 2023. A Public Meeting was held virtually on November 9, 2023. Documentation of comments received, and a participant list are enclosed as Attachment No. 2.

13. Subrecipient

The City has entered into a Purchase and Sale Agreement for development of the property into affordable housing with Azure Community Development ("Azure"). Azure is a subrecipient of this application, is registered as a 501c3, and will be assisting in the implementation of the proposed cleanup. No other contractors have been selected for this Brownfield Grant request.



## Los Angeles Regional Water Quality Control Board

November 9, 2023

Ms. Carol Averell  
City of South Gate, Housing Manager  
8650 California Avenue  
South Gate, CA 90280

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
**CLAIM NO. 7019 2280 0000 3772 3687**

**SUBJECT: US ENVIRONMENTAL PROTECTION AGENCY BROWNFIELD CLEANUP GRANT APPLICATION - CONFIRMATION OF SITE ENROLLMENT IN VOLUNTARY CLEANUP PROGRAM**

**CASE/SITE: CITY OF SOUTH GATE FORMER FREEDOM FORD, 7916 LONG BEACH BOULEVARD, SOUTH GATE, CA (SITE ID NO. 2040191, SCP NO. 0475B)**

Dear Ms. Averell:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) acknowledges that the City of South Gate plans to conduct the cleanup of a brownfield site and is applying for an FY24 EPA Brownfields Cleanup Grant.

The City of South Gate has developed an application requesting site-specific federal Brownfields Cleanup funding for the former Freedom Ford site located at 7916 Long Beach Boulevard, South Gate, California 90280.

The Regional Board affirms that the former Freedom Ford site:

- i. Is eligible to be enrolled in the Regional Board voluntary response program (voluntary cleanup program);
- ii. Is currently enrolled in the voluntary cleanup program with the Regional Board; and,
- iii. Additional assessment is needed to sufficiently characterize the site in order for the remediation work to begin. There will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2024, to allow for the remediation work to begin on the site.

**If you have any questions regarding this letter, please contact the project manager Mr. David Young at (213) 576-6733 ([David.Young@waterboards.ca.gov](mailto:David.Young@waterboards.ca.gov)) or Mr.**

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NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

**Joshua Cwikla, Supervisor, Site Cleanup Program Unit I, at (213) 576-6735  
([Joshua.Cwikla@waterboards.ca.gov](mailto:Joshua.Cwikla@waterboards.ca.gov)).**

Sincerely,

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for Susana Arredondo  
Executive Officer

cc: Vanessa Delgado, Azure Development Co.