

**The City of Atlanta Brownfields Revolving Loan Fund (BRLF)
U.S. Environmental Protection Agency Cooperative Agreement #-02D34622**

**Focused Community Strategies -105 McDonough Blvd Subgrant
Community Involvement Plan (CIP)**

The City of Atlanta-Invest Atlanta Brownfields Revolving Loan Fund Program

The City of Atlanta and Invest Atlanta Brownfield Revolving Loan Fund (BRLF) program provides financing for brownfield remediation of eligible projects within the Atlanta city limits. It offers loans to private property owners and subgrants to non-profits to support remediation required for cleanup of a brownfield site.

The BRLF Program is administered by the Office of Zoning and Development (OZD) in the Department of City Planning (DCP) and Invest Atlanta. The Invest Atlanta Board approves BRLF loans and subwards at its monthly meetings and also serves as the Fund Manager. A Qualified Environmental Professional (QEP) provides oversight of all cleanup activities to ensure they are conducted in accordance with all applicable regulations and in accordance with EPA’s requirements.

The BRLF Program is funded with a US Environmental Protection Agency (EPA) FY2022 Bipartisan Infrastructure Law (BIL) Brownfield Revolving Loan Fund (BRLF) grant (Cooperative Agreement #-02D34622). A brownfield is a property where expansion, redevelopment or reuse may be complicated by the presence or potential presence of a hazardous substance, pollutant or contaminant.

Community involvement is the foundation of planning activities undertaken by the City of Atlanta Department of City Planning, Office of Zoning and Development (OZD) and it is integral to the success of the City of Atlanta’s Brownfields Program. The goal of the Community Involvement Plan (CIP), an administrative requirement of the EPA BRLF grant, is to implement a plan that keeps stakeholders informed and involved so that they are aware of the program and site specific funded cleanup projects, to answer questions, to provide timely project specific information, and to provide the opportunity to comment on either general program or a site specific cleanup. This site specific CIP describes how community members, community-based organizations and key stakeholders will be informed and have the opportunity for meaningful involvement throughout the site remediation funded by the BRLF program.

The City of Atlanta Brownfield Program Goals

The goals of the City of Atlanta’s Brownfields Program are to improve the quality of life, revitalize neighborhoods, and increase the City’s tax base by:

- Encouraging redevelopment of brownfield sites;
- Protecting human health, natural resources, and the environment;
- Supporting the retention and attraction of jobs and services;



- Maximizing the effectiveness of the Brownfield Program through collaborative efforts;
- Educating and engaging with the community about the Brownfields Program; and
- Investing EPA Brownfields grant funds in Target Communities.

Site Specific Community Involvement Plans

A Site Specific Community Involvement Plan (CIP) is required for each subgrant and loan. Providing reasonable notice and the opportunity for public involvement and comment on the proposed cleanup options is part of every CIP. Each CIP Plan includes:

- A project webpage that is part of www.atlantaga.gov/brownfields and includes a project fact sheet, meeting notice, required project documents (ABCA and QAPP), and presentations;
- Public Comment Period: written and oral comments on any items related to a proposed cleanup can be made during a 30 day public comment period. Comments and responses will be part of the project Administrative Record.
- Posting meeting notices on the City Planning Department's existing social media accounts and providing the meeting notice to the Neighborhood Planning Unit and the neighborhood association where the brownfield site is located.
- Presenting project information at a neighborhood and/or Neighborhood Planning Unit meeting where the brownfield site is located.
- Holding a community meeting to discuss the proposed cleanup, the Analysis of Brownfield Cleanup Alternatives (ABCA) and solicit comments from interested parties.
- Incorporating Community Input: During the 30 day public comment period and during the community meetings, any stakeholder can ask questions, provide comments, and have comments considered in the proposed remediation.

Focused Community Strategies

Focused Community Strategies (FCS), a non-profit organization, partners with under-resourced neighborhoods to provide innovative and holistic development that produces flourishing communities. Working alongside neighbors, FCS creates transformation through neighborhood engagement, mixed-income housing, and economic development. In the South Atlanta neighborhood, FCS creates home buying and rental opportunities for residents across the income spectrum. They operate small businesses, such as the Carver Market and Community Grounds, which provide local jobs and resources to community residents.

105 McDonough Boulevard

105 McDonough Boulevard is a triangular shaped parcel at the intersection of McDonough Boulevard and Jonesboro Road in the South Atlanta neighborhood. Diamond J Mart, a petroleum filling station, operated at the site from 1958 to 2008. In 2018, Focused Community Strategies purchased the parcel along with the adjacent parcels- 1326 Jonesboro Road, 115 and 119 McDonough Boulevard. 1326 Jonesboro Road is undeveloped but had filling stations from the 1940s to 1970s. 119 McDonough Boulevard was developed with a residential structure but it currently

undeveloped. A filling station operated at 115 McDonough Boulevard parcel from 1935 to 1938. FCS also purchased the Martin Street right-of way adjacent to the south. All of the parcels were consolidated into a 0.5 acre site with the 105 McDonough Boulevard address.

105 McDonough Environmental Assessments

Numerous Environmental Site Assessments (ESA) have been conducted at this site. An April 2018 Phase I Environmental Site Assessment, conducted prior to FCS's purchase of the site, stated that 105 McDonough had four underground storage (UST) tanks (two 4,000-gallon gasoline underground storage tanks; one 2,000-gallon gasoline underground storage tank; and one 550-gallon kerosene underground storage tank). Various dry cleaners operated across the street at 1325, 1327 and 1329 Jonesboro Road SE between 1945 and 1995. Due to these Recognized Environmental Conditions (REC), a Phase II ESA was conducted to investigate potential chlorinated solvent and petroleum hydrocarbon impacts on soil and groundwater. Laboratory analysis identified some contaminants of concern above Environmental Protection Division's (EPD) standards. An application to enter the site into the Georgia EPD's Brownfields Program and a Prospective Purchaser Corrective Action Plan (PPCAP) was submitted to the Brownfield Program. Proposed corrective action included closure of the underground storage tanks following the Georgia Environmental Division UST Closure Guidance, removal of soil exceeding non-residential standards and mitigation of potential vapor intrusion. EPD's

In 2019, the City of Atlanta Brownfields Program conducted the underground storage tank (UST) closure with its 2017 EPA Brownfield Assessment Grant. Three USTs (and 1,500 gallons of fuel) were removed, along with 70 cubic yards of contaminated soil, fuel lines, pumps and canopy in accordance with GA EPDs Closure Guidance. Afterwards, EPD recommended implementation of a Corrective Action Plan Part A which consisted of installation monitoring wells to delineate groundwater impacts of BTEX (benzene, toluene, ethylbenzene and xylene) constituents and to monitor groundwater for two years. Due to the concentrations of BTEX in groundwater, a High Vacuum Remediation (HVR) event to remove petroleum-impacted groundwater was conducted. After monitoring continued for several more quarters, another High Vacuum Remediation (HVR) event removed additional petroleum impacted groundwater. Afterwards, soil samples were collected to delineate the vertical and horizontal extents of petroleum impacts. The highest BTEX concentrations in the soil delineation samples were detected at depths ranging from 15 to 19 feet below ground surface (BGS) beneath the former 4,000-gallon USTs and to the southwest of the tank pit. Excavation of the soil from the area of the former tank pit to remove the impacted soil was recommended.

In 2023, the City of Atlanta Brownfield Program conducted a Phase II ESA to characterize subsurface soil, groundwater and soil vapor conditions at 115 and 119 McDonough and 1325 Jonesboro Road with a 2020 EPA Brownfield Assessment Grant. Tetrachloroethene was detected above residential and non-residential vapor intrusion screening levels (VISL). The vapor analysis determined that indoor air via vapor intrusion from sub-slab soil gas is a concern. Due to the presence of soil and groundwater impacts over much of the site, vapor mitigation measures were recommended for all future structures on site.

105 McDonough Remediation

Corrective action for the site will be performed under the GA EPD Brownfield Program with an objective to meet Type 1 or Type 2 (residential) risk reduction standards (RRS) for soil. Petroleum impacted soil at the former Diamond J Mart parcel will be remediated by excavation and offsite disposal. The excavation area of the impacted soil measures approximately 1,350 ft² with a planned depth of the excavation ranging from 16-20 feet bgs. It is estimated that 1,000 cubic yards (CY) of impacted soil will require excavation. Free phase petroleum is also expected to be encountered and removed during the remediation activity. Following excavation and confirmation sampling, clean soil will be placed in the excavated area to the extent required by the site development plan. Granular materials such as stone will be used to backfill the excavation to initially bridge the expected high water table (approximately 16-17 feet bgs). A geomembrane fabric will be placed on top of the stone prior to backfilling with soil.

To mitigate the vapor impact from the adjacent dry cleaners (no longer operating), a continuous vapor barrier will be placed under the concrete slab of each building. In addition, 4” perforated pipe buried in crushed stone will be below the vapor barrier as shown in the slab plans.

Subgrant Award

Focused Community Strategies submitted an application to the City of Atlanta/Invest Atlanta Brownfields Revolving Loan Fund Program for a subgrant award to remediate the soil and installation of vapor barrier in new buildings at 105 McDonough Blvd. The Invest Atlanta Board approved the subgrant award at its June 20, 2024 Board meeting. After remediation, FCS will redevelop the site with a two story commercial building on the site of the former gas station and with two three-story buildings with 18 multi-family units (12 affordable at 60% AMI and below and 6 market rate) on the balance of the site. The project cost is estimated at \$8M and will create approximately 20 jobs.

Administrative Record

The Administrative Record for the site will include documents demonstrating the basis for the cleanup and its progress—such as Environmental Site Assessments Corrective Action Plan; U.S. EPA required site-specific documents including the Analysis of Brownfield Cleanup Alternatives (ABCA), and Quality Assurance Project Plan (QAPP); responses to public comments and a closeout report. The Administrative Record will be available for review at the Department of City Planning Office of Zoning and Development (OZD) at the Atlanta City Hall located at 55 Trinity Avenue, Suite 3350, Atlanta, GA 30303. Some of the documents will be posted on the City of Atlanta Brownfields website at www.atlantaga.gov/brownfields.

Community Involvement Activities

Community Involvement is an essential part of all brownfield projects. The community involvement for the BRLF subgrant includes notifying the community about the subgrant to Focused Community



Strategies, providing 30 days for public comment and having a community meeting. The following Community Involvement activities will be implemented.

Community Notification: Information about the subgrant to Focused Community Strategies will be available in the following ways.

- **Website:** information about this project will be posted on the City of Atlanta’s Brownfields Program website at <http://www.atlantaga.gov/brownfields> and on the City Planning Department social media sites. A brownfield website page for 105 McDonough will have information about the project including a fact sheet, the community meeting notice and the Analysis of Brownfield Cleanup Alternatives (ABCA) and other information as needed.
- **Community Meeting Notice:** a community meeting notice will be created and distributed by the Department of City Planning. It will be posted on the Department of City Planning social media and project website and provided to Focused Community Strategies for distribution to its stakeholders.
- Information about the community meeting will be presented at the South Atlanta Civic League October 7, 2024 meeting and the Neighborhood Planning Unit Y September 16, 2024 meeting.

Community meeting: A community meeting will be held on Tuesday October 8 starting at 6:30 at the FCS Community Room, 1297 McDonough Blvd SE, Atlanta, 30315. At this meeting, the public will have a chance to learn and ask questions about the City of Atlanta BRLF Program and the subgrant process. Atlanta’s BRLF Qualified Environmental Professional (QEP) will present information about the proposed brownfield remediation and the Analysis of Brownfields Cleanup Alternatives (ABCA).

Community Comment Period: The 30 day public comment period will be from September 16 to October 15, 2024.

Point of Contact: To obtain information, to schedule an appointment to review documents, to submit comments or questions about this project, please contact Jessica Lavandier at jlavandier@atlantaga.gov and at 404-450-6442 in the Department of City Planning, Office of Zoning and Development.

Previous Community Engagement: FCS has been active in the South Atlanta Neighborhood and in NPU Y for years. The South Atlanta Civic League voted to support the 105 McDonough Development. FCS provides regular updates at the Atlanta Civic League monthly meetings.