

Application Information Sheet

(1) Applicant Identification

Swift Avenue Housing Associates, L.P. is the applicant for this EPA Brownfields Cleanup Grant (Grant). Swift Avenue Housing Associates, L.P. ("Applicant") is a single-asset limited partnership formed to own, remediate, and develop Swift Avenue Apartments. The Partnership is governed by a Managing General Partner structure that ensures full nonprofit oversight, financial accountability, and regulatory compliance. The Managing General Partner is CHW Swift Avenue, LLC, a California limited liability company whose sole member and manager is Community HousingWorks (CHW), a California nonprofit public benefit corporation that has a tax-exempt status under section 501(c)(3) of the IRC. Through this structure, CHW retains full authority to manage the Partnership, execute contracts, receive and disburse grant funds, and ensure compliance with all federal, state, and local program requirements. As such, the experience and qualifications of CHW is described throughout this application to demonstrate capacity to successfully carry out the Grant activities.

3111 Camino del Rio N, Suite 800, San Diego, CA 92108

(2) Website URL

chworks.org

(3) Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$886,305

(4) Location

City Heights Neighborhood, City of San Diego, County of San Diego, California

(5) Property Information

Swift Avenue Apartments
4017-4021 Swift Avenue, San Diego, California 92104

(6) Contacts

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 - Title: Project Manager
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- b. Chief Executive/Highest-Ranking Elected Official
 - Name: Sean Spear
 - Title: Chief Executive Officer

- Phone number: 619.858.3519 (Assistant)
- Email address: sspear@chworks.org
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(7) Population

The population of the City of San Diego as of the 2020 U.S. Census is 1,384,429 (U.S. Census).

(8) Other Factors

Other Factors	Page #
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The priority site(s) is impacted by mine-scarred land.	
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).	
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 3.A.(2), for priority site(s) within the target area(s).	
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

(9) Releasing Copies of Applications

Not applicable



Site Map



Narrative Criteria

(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

Swift Avenue Housing Associates, L.P. is the applicant for this EPA Brownfields Cleanup Grant (Grant). Swift Avenue Housing Associates, L.P. ("Applicant") is a single-asset limited partnership formed to own, remediate, and develop Swift Avenue Apartments.

The Partnership is governed by a Managing General Partner structure that ensures full nonprofit oversight, financial accountability, and regulatory compliance. The Managing General Partner is CHW Swift Avenue, LLC, a California limited liability company whose sole member and manager is Community HousingWorks (CHW), a California nonprofit public benefit corporation that has a tax-exempt status under section 501(c)(3) of the IRC (see Threshold for organization charts).

Through this structure, CHW retains full authority to manage the Partnership, execute contracts, receive and disburse grant funds, and ensure compliance with all federal, state, and local program requirements. As such, the experience and qualifications of CHW is described throughout this application to demonstrate capacity to successfully carry out the Grant activities.

CHW is a San Diego-based nonprofit affordable housing developer whose mission is to create and preserve high-quality, service-enriched housing that fosters healthy, stable communities. CHW specializes in the redevelopment of underutilized and environmentally challenged urban sites to deliver affordable and supportive housing for low-income households, veterans, and other vulnerable populations. Through its affiliated ownership entity, described above, CHW will be responsible for implementing cleanup and advancing the Site's redevelopment in alignment with community revitalization and public health goals.

The target area (TA) for this application is Census Tract 6073001600, located within the City Heights Community Plan area of the City of San Diego, which is part of the broader Mid-City planning area. Mid-City is one of the City's oldest and most diverse urban areas, with development patterns shaped by early 20th-century streetcar corridors, post-World War II suburbanization, and later freeway construction that fragmented once-continuous neighborhoods. Much of the area was developed prior to modern environmental regulations, and nearly 60 percent of residential buildings in Mid-City were constructed before 1964. These legacy development patterns increase the likelihood that previously developed parcels may contain environmental conditions that complicate reuse.

Based on data from LightBox EDR, five leaking underground storage tank (LUST) sites are present within a ¼-mile radius. Each of the sites is listed as a closed release case, indicating that the facility was assessed and remediated to the satisfaction of the regulatory oversight agency at the time of closure. Groundwater is not known to be impacted by these facilities, however there is the potential for residual impacts to remain in soil and soil vapor at the sites. Additional LUST sites are located within a ½-mile radius. Several historical dry cleaning facilities are located in the vicinity of the site with no known unauthorized releases, however it is possible that unidentified releases may have impacted the subsurface. A burn site is located nearly a mile to the south of the site.

Brownfield challenges in City Heights and surrounding Mid-City neighborhoods primarily relate to the presence of underutilized or vacant parcels where real or perceived environmental contamination creates barriers to reinvestment. Environmental uncertainty, investigation requirements, and cleanup costs can delay or prevent redevelopment, even in areas where zoning, infrastructure, market demand, and access to transit would otherwise support productive reuse. In transit-served neighborhoods with limited vacant land, these barriers constrain the City's ability to meet housing needs and implement adopted planning and revitalization goals.

The impacts of these brownfield challenges are particularly significant in City Heights, which has experienced long-term housing underproduction relative to population growth, high renter concentrations, and increasing housing cost pressures. Between 1980 and 2000, Mid-City added nearly 48,000 residents while producing only approximately 6,200 housing units, and subsequent downzoning contributed to declining population despite continued citywide growth. Today, City Heights has lower median household incomes than many other Mid-City communities, larger average household sizes, and a higher share of renters, intensifying demand for affordable housing in a constrained land market. When brownfield sites remain underutilized, these conditions are exacerbated by the loss of opportunities to deliver housing and community-serving development in well-located areas.

b. Description of the Priority Brownfield Site(s)

Swift Avenue Property (Site; 4017-4021 Swift Avenue, San Diego): The Site consists of two adjacent parcels totaling approximately 0.3 acres (13,010 square feet) and is situated in a fully urbanized, transit-served neighborhood. The Site has been developed with residential structures since approximately the early 1940s and reflects legacy urban development typical of older Mid-City neighborhoods. One parcel includes a 1,264 square foot, 2-bedroom, 2-bathroom single-family home on a 5,887 square foot lot. The second parcel includes a 1,534 square foot, 3-bedroom, 1-bathroom single-family home with a detached single-car garage on a 7,416 square foot lot. Both residential structures are currently leased, and the tenants have waived their rights to relocation assistance. These structures will be demolished to make way for the new affordable housing development, Swift Avenue Apartments.

Based on information obtained during the preparation of the *Phase I Environmental Site Assessment, 4017 to 4021 Swift Avenue, San Diego, California 92104, Assessor's Parcel Numbers (APNs): 447-390-12 and 447-390-13*, dated June 1, 2023, prepared by SCS Engineers (Phase I ESA), the Site has been occupied by two single-family residences (SFR) since at least 1943. The structures were present during a time-period when lead-based paint was in common use, and organochlorine pesticides (OCPs) were routinely applied around buildings as termiticides/pesticides. Therefore, the Phase I ESA concluded that there is the potential for OCPs and lead-based paint (LBP) to be present in soil surrounding the structures. Additionally, during this time-period, the burning of trash in backyard incinerators was a common practice, therefore, there is the potential for elevated metals to be present in the backyards in connection with burn ash. The Phase I ESA also identified the presence of off-site

automotive repair facilities in the vicinity of the Site, as well as a former gasoline service station on the adjoining property to the south with no records of underground storage tanks (USTs) having been removed. Based on the nature of these operations, it is possible that unidentified unauthorized releases may have occurred at these facilities, which may have impacted the subsurface. Based on these findings, additional assessment was conducted.

The following Phase II environmental site assessment reports were prepared by SCS for the Site: *Phase II Environmental Site Assessment, 4017 to 4021 Swift Avenue, San Diego, California 92104, Assessor's Parcel Numbers (APNs): 447-390-12 and 447-390-13*, dated September 19, 2023 and *Additional Phase II Environmental Site Assessment, 4017 to 4021 Swift Avenue, San Diego, California 92104, Assessor's Parcel Numbers (APNs): 447-390-12 and 447-390-13*, dated May 13, 2025.

OCPs were detected in 3 of the 15 soil samples analyzed at concentrations below both health risk and hazardous waste criteria. Lead, copper, nickel and silver were detected in soil at concentrations exceeding both health risk criteria and California hazardous waste limits; zinc was also detected at concentrations exceeding hazardous waste limits. Benzene was detected in soil vapor at concentrations exceeding the State Water Resources Control Board (SWRCB) Low Threat Closure Policy (LTCP) criteria.

Although the Site is located within a Transit Planning Area, near major corridors and essential services, environmental conditions identified through completed site assessments must be addressed before redevelopment can proceed. EPA Cleanup Grant funding will help remove environmental barriers at this priority site, enabling remediation and supporting timely redevelopment for affordable, transit-oriented housing. By addressing brownfield challenges at this Site, the proposed cleanup will contribute to neighborhood revitalization, improved land use efficiency, and the advancement of local and regional housing and planning objectives within the City Heights community.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

Following cleanup, the Site will be redeveloped by Community HousingWorks (CHW) as Swift Avenue Apartments, a 57-unit, new construction, transit-oriented affordable housing development. The project will consist of 56 deed-restricted affordable rental units and one unrestricted manager's unit, with a unit mix of 52 one-bedroom units and four two-bedroom affordable units, plus one two-bedroom manager's unit. Affordability will be maintained for 55 years.

The development will include 20 one-bedroom permanent supportive housing units supported through a preliminary award recommendation from the San Diego Housing Commission (SDHC) for Veterans Affairs Supportive Housing (VASH) Project-Based Vouchers (PBVs). Of these units, five will serve VASH-eligible veterans at or below 30 percent of Area Median Income (AMI) and 15 will serve VASH-eligible veterans at or below 50 percent of AMI. VASH PBV applicants will be identified through the Coordinated Entry System. The U.S. Department of Veterans Affairs will provide case management and supportive services to residents of the VASH units.

On-site services will be provided for residents of the 36 additional low-income units, including adult education, health and wellness programming, skill building, computer learning skills, financial planning, and social programming. All residents will have access to organized community activities such as social events, wellness classes, and financial education, delivered at no cost through an on-site community space.

The development will be located within 0.1 mile of the University Avenue–Swift Avenue bus stop, qualifying the site as part of the City's Transit Planning Area. The project is designed to function as a pedestrian-friendly housing option, supporting residents who rely on public transportation and related sustainable alternatives. The site is within walking distance of essential services, including a grocery store and nearby schools. The development will include zero on-site parking spaces, consistent with its transit-oriented location.

Cleanup of the site is necessary to enable safe residential use and advance long-term neighborhood revitalization. The proposed reuse aligns with and advances the following adopted plans and community priorities:

- **City of San Diego General Plan (Blueprint San Diego, 2024):** The project advances the City of Villages strategy by delivering infill housing in a transit-served location and is located in a high-propensity area for new homes and services, supporting compact growth, reduced vehicle miles traveled, and pedestrian-oriented development.
- **Mid-City Communities Plan (1998, as amended):** The reuse is consistent with the plan's goals to encourage higher-density residential development near major transportation corridors, relate development intensity to transit capacity, and support reinvestment in older urban neighborhoods.
- **Mid-City Atlas (2025):** The project directly responds to identified opportunities for reinvestment in City Heights by facilitating redevelopment of an underutilized site in an area characterized by older development patterns, limited vacant land, and strong access to transit and services.
- **City of San Diego Mobility Master Plan:** The site's location within a Transit Planning Area and within 0.1 mile of public transit supports Citywide goals to prioritize walking, biking, and transit, reduce reliance on personal vehicles, and improve access to daily needs.
- **San Diego Housing Commission Strategic Priority – Increasing and Preserving Housing Solutions:** The project supports SDHC priorities by creating long-term affordable housing and 20 permanent supportive housing units for veterans experiencing homelessness.

The site is not located within a federally designated floodplain, and floodplain considerations are not applicable.

The reuse strategy was informed through coordination with key project partners and public outreach, including a presentation to the City Heights Community Planning Group in June 2025, which issued a letter of support. Partners include Community HousingWorks, the U.S. Department of Veterans Affairs, and the San Diego Housing Commission and City of San Diego, ensuring the reuse reflects community priorities and adopted planning frameworks.

d. Outcomes and Benefits of Reuse Strategy

Cleanup and redevelopment of the Site will generate substantial economic, social, and environmental benefits for the Target Area and the broader Mid-City planning area by converting an underutilized brownfield into a high-density, transit-oriented affordable housing development. The Market Study prepared for the project confirms strong unmet demand for affordable and supportive housing in the Primary Market Area, with high occupancy rates at comparable properties and limited availability of units affordable to extremely low- and very low-income households. By enabling timely redevelopment of this infill parcel, the proposed cleanup will remove a barrier to investment in a location where market conditions, transit access, and zoning already support residential growth and neighborhood-serving development.

Post-cleanup reuse as Swift Avenue Apartments will stimulate local economic development through both short-term and long-term impacts. In the near term, remediation and construction activities will create jobs and generate spending for environmental, construction, engineering, and related professional services. In the long term, the completed 57-unit affordable and permanent supportive housing development will support ongoing employment in property management, building maintenance, and resident services. The addition of new households will increase foot traffic and demand for goods and services along University Avenue and within the City Heights Business Improvement District, strengthening small businesses and reinforcing the role of the corridor as a neighborhood commercial spine.

The project will also provide lasting nonprofit and community benefits by creating permanently affordable housing, including 20 supportive units for formerly homeless veterans, with on-site services delivered by a mission-driven nonprofit developer and the U.S. Department of Veterans Affairs. While the project does not create new parkland, it places residents within walking distance of existing parks, schools, transit, and community facilities, improving access to public amenities and supporting equitable neighborhood revitalization.

The proposed reuse will improve local resilience to extreme weather events, particularly extreme heat, by replacing older, inefficient structures with new housing designed to modern building and energy-efficiency standards. Mid-City neighborhoods, including City Heights, experience elevated heat exposure and heat risk due to high impervious surfaces, limited tree canopy, and older building stock. New construction will provide residents, especially vulnerable populations such as formerly homeless veterans, with safer, more thermally comfortable housing that reduces exposure to heat-related health risks.

The project's location within a Transit Planning Area also supports resilience by reducing reliance on personal vehicles, improving access to services during emergencies, and supporting mobility options for residents who may have limited transportation access during extreme weather or other disruptions.

The reuse of the site incorporates multiple energy-efficient design measures consistent with state and local standards. The development will comply with California Tax Credit Allocation Committee (CTCAC) minimum energy-efficiency requirements and will include Energy Star-rated appliances, energy-efficient LED lighting, high-performance windows and doors with low-E coatings, programmable thermostats, and efficient building systems designed to reduce energy consumption. Open-air corridors and drought-tolerant landscaping will further reduce operating costs, energy use, and water demand.

While the project does not include on-site renewable energy generation, these energy-efficiency measures will lower utility costs for residents, reduce greenhouse gas emissions associated with building operations, and enhance long-term affordability and sustainability of the housing development.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

An Asbestos and Lead-Based Paint Survey is needed prior to remediation, the quoted cost for this is \$12,750. This expense has already been funded and accounted for by CHW. All required assessment and characterization will be completed prior to June 15, 2026.

f. Resources Needed for Site Remediation

The EPA funding requested will be enough to complete the remediation of the proposed site, based on quotes from a Qualified Environmental Professional (QEP).

g. Resources Needed for Site Reuse

Name of Resource	Resource Reuse Activities	Resource Secured or Unsecured?	Additional Details or Information About the Resource
Tax Exempt Loan	\$8,229,000.00	Secured	General funding for the development of Swift Avenue Apartments
Seller Carryback Loan	\$1,285,000.00	Secured	General funding
San Diego Housing Commission	\$4,000,000.00	Secured	General funding
City of San Diego CDBG Funds	\$4,000,000.00	Secured	General funding
Impact Fee Waiver	\$832,190.50	Secured	General funding
Deferred Developer Fee	\$2,258,832.00	Secured	General funding
General Partner Capital	\$100.00	Secured	General funding
Low Income Housing Tax Credit Equity	\$20,179,872.00	Unsecured	Applicant will apply for 4% or 9% tax credits.

h. Use of Existing Infrastructure

Cleanup and redevelopment of the Swift Avenue site will facilitate efficient use of existing urban infrastructure within the City Heights neighborhood, which is fully served by public water, sewer, electricity, telecommunications, stormwater systems, and an established road, sidewalk, and transit network. The site is located within 0.1 mile of public transit and will leverage existing streets and utilities without requiring major off-site infrastructure expansion. To ensure the project meets current health and safety requirements, limited off-site improvements will be implemented in coordination with the City of San Diego, including upgrades to sidewalks, curbs and gutters, commercial driveways, alley improvements, trees and tree gates, and dry utilities

adjacent to the property. These improvements, with an estimated total cost of approximately \$285,285, are incorporated into the project’s overall development budget and will be funded through non-EPA sources. No new major infrastructure systems are required, and the proposed cleanup will support reinvestment that maximizes use of existing infrastructure while improving safety and functionality in the public right-of-way.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community’s Need for Funding

The Site is located in the City Heights neighborhood of San Diego (ZIP Code 92104), within the Mid-City planning area, a community characterized by high concentrations of low-income households, renters, linguistically isolated populations, and residents experiencing cumulative environmental and health burdens (U.S. Census Bureau, ACS 2019–2023; SANDAG, 2023; CDC National Environmental Public Health Tracking Network, 2024). Median household income in City Heights is approximately \$56,113, compared to \$104,317 citywide (SANDAG, 2023). In Mid-City, 65 percent of households are renters, compared to 52 percent for the City of San Diego overall (U.S. Census Bureau, ACS 2019–2023). CalEnviroScreen 4.0 ranks the project census tract (CT 6073001600) in the 82nd percentile for housing burden, 90th percentile for poverty, and 86th percentile for unemployment, indicating severe economic stress and limited household capacity to absorb additional costs associated with environmental remediation (CalEnviroScreen 4.0, 2024).

Elements	Target Area (Percentile)
Education	74
Linguistic Isolation	67
Poverty	90
Unemployment	86
Housing Burden	82

Source: CalEnviroScreen

Socioeconomic and linguistic barriers further limit access to resources. More than 30 percent of City Heights residents over age five have limited English proficiency, compared to approximately 10 percent citywide (U.S. Census Bureau, ACS 2019–2023; SANDAG, 2023). Average household size in City Heights is 2.96 persons, exceeding the citywide average of 2.52, reflecting multigenerational and overcrowded living conditions that intensify housing cost burden and health vulnerability (SANDAG, 2023). County-level health utilization data also show elevated emergency department use in the region and higher rates of cost-burdened households and chronic disease prevalence in low-income and veteran populations (Centers for Medicare & Medicaid Services, 2022; U.S. Census Bureau, ACS 2019–2023; CDC PLACES, 2023).

Despite these documented needs, City Heights lacks the fiscal capacity to independently finance environmental remediation of contaminated properties. Brownfield cleanup requires substantial upfront capital for investigation, soil removal, vapor mitigation, regulatory oversight, and long-term monitoring which are costs that cannot be absorbed by residents or community-based nonprofit developers in a neighborhood where median household income is nearly 50 percent below the citywide median and where poverty, unemployment, and housing cost burden rank in the highest statewide percentiles (SANDAG, 2023; CalEnviroScreen 4.0, 2024). Market conditions for affordable housing development further constrain available resources, as construction costs, insurance, and interest rates remain elevated while local and state subsidy programs are highly competitive and insufficient to cover extraordinary environmental remediation costs.

Community HousingWorks (CHW) has demonstrated strong local commitment to the Swift Avenue Apartments project by securing approximately \$8 million in local public funding, among other sources listed above. However, environmental cleanup remains a critical and cost-intensive component that must be addressed to advance redevelopment. EPA Brownfields Cleanup Grant is essential to close the gap and make the project financially feasible. Without this financial investment, this project would be delayed and postpone the development of much needed affordable housing. This funding would help prevent delays to this needed redevelopment and would strengthen the project’s overall financing structure by reducing environmental uncertainty and development risk, thereby strengthen competitiveness for critical housing resources such as Low-Income Housing Tax Credits.

EPA Brownfields Cleanup Grant funding is therefore critical to address contamination at the Swift Avenue site and remove barriers to productive reuse. Without federal assistance, legacy contamination would remain unaddressed, perpetuating health risks and preventing redevelopment in a census tract with documented cumulative pollution burden, high poverty, and limited access to capital for environmental remediation (CalEnviroScreen 4.0, 2024; CDC National Environmental Public Health Tracking Network, 2024; U.S. Census Bureau, ACS 2019–2023). The requested funding will directly support cleanup that the community is otherwise unable to undertake, enabling safe reuse of the property in a manner that advances public health, housing stability, and equitable revitalization in one of San Diego’s most economically and environmentally overburdened neighborhoods.

b. Health or Welfare of Sensitive Populations

The target area contains multiple sensitive populations as defined by EPA, including children, older adults, individuals with chronic health conditions and disabilities, linguistically isolated households, and veterans experiencing homelessness. CalEnviroScreen 4.0 ranks the project census tract (CT 6073001600) in the 74th percentile statewide for Population Characteristics, reflecting a high concentration of residents who are more susceptible to environmental exposures due to age, health status, and social vulnerability (CalEnviroScreen 4.0, 2024).

Health indicators show that respiratory and developmental vulnerabilities are elevated in the surrounding community. The tract ranks in the 57th percentile for asthma and the 75th percentile for low birth weight, conditions that disproportionately affect children and are strongly associated with traffic-related air pollution and cumulative environmental stressors (CalEnviroScreen 4.0, 2024). Regional health data further indicate elevated prevalence of cardiovascular disease and diabetes in ZIP Code 92104, increasing susceptibility to air pollution and extreme heat, particularly among older adults and individuals with disabilities (CDC PLACES, 2023).

Heat vulnerability is a critical welfare concern for sensitive populations. Seniors, infants, people with respiratory and cardiovascular conditions, and individuals experiencing homelessness face heightened risk of heat-related illness and mortality under these conditions.

The proposed cleanup and reuse will eliminate exposure to contaminated soil and potential vapor intrusion pathways that contribute to respiratory and developmental risks, and by redeveloping the site as energy-efficient, climate-resilient housing. Improved indoor air quality, thermal performance, and access to supportive services will reduce exposure and vulnerability for children, older adults, people with chronic illness, and veterans experiencing homelessness, thereby improving overall health protection for the area's most sensitive populations.

Elements	Target Area (Percentile)
CalEnviroScreen 4.0 Percentile	71
Pollution Burden Percentile	57
Population Characteristics Percentile	74
Hazardous Waste	70
Impaired Waters	90
Diesel Particulate Matter	95
Traffic	66
Lead From Housing	70
Asthma	57
Low Birth Weight	75
<i>Source: CalEnviroScreen</i>	

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

The target area exhibits a greater-than-normal incidence of diseases and adverse health conditions associated with environmental exposures. CalEnviroScreen 4.0 indicates that CT 6073001600 ranks in the 95th percentile statewide for diesel particulate matter and the 66th percentile for traffic exposure, reflecting significant exposure to combustion-related air pollutants linked to asthma, cardiovascular disease, and cancer risk (CalEnviroScreen 4.0, 2024). The tract also ranks in the 70th percentile for hazardous waste proximity and the 90th percentile for impaired surface waters, indicating cumulative exposure pathways that can contribute to long-term health effects (CalEnviroScreen 4.0, 2024).

Health outcome indicators demonstrate that these exposures correspond with elevated disease burden. Asthma prevalence in the tract ranks above the state median (57th percentile), and low birth weight ranks in the 75th percentile, conditions associated with air toxics, traffic emissions, and environmental stress during pregnancy (CalEnviroScreen 4.0, 2024). Regional datasets further document elevated rates of cardiovascular disease and diabetes in the project ZIP code, conditions that are exacerbated by air pollution and extreme heat and that increase vulnerability to environmental contaminants (CDC PLACES, 2023; CDC National Environmental Public Health Tracking Network, 2024).

Extreme heat further amplifies disease risk. The Mid-City mesa, including City Heights, is classified in the highest heat-risk categories citywide, with combined heat exposure and social vulnerability scores substantially exceeding the city average (City of San Diego Climate Resilient SD Program, 2024; NASA DEVELOP, 2024; Mid-City Atlas, 2025). Heat stress is a known trigger for asthma exacerbation, cardiovascular events, and adverse pregnancy outcomes, particularly in communities with limited access to cooling and high baseline rates of chronic illness.

Cleanup of the Swift Avenue site will eliminate the potential for exposure to contaminated media and potential inhalation of volatile or particulate contaminants, helping to lower exposure pathways associated with respiratory, cardiovascular, and developmental outcomes. The reuse strategy will further mitigate disease risk through high-performance building design, improved ventilation, and heat-resilient construction, reducing indoor pollutant concentrations and thermal stress for residents with asthma, heart disease, and other environmentally sensitive conditions.

d. Economically Impoverished/Disproportionately Impacted Populations

The City Heights target area has experienced disproportionate environmental impacts resulting from historic transportation, land-use, and infrastructure decisions that have concentrated pollution sources and reduced environmental buffers in predominantly low-income and immigrant communities. CalEnviroScreen 4.0 ranks the project census tract in the 71st percentile statewide for Overall Cumulative Impact and the 57th percentile for Pollution Burden, reflecting combined exposure to traffic emissions, diesel particulate matter, hazardous waste proximity, impaired waters, and other environmental stressors (CalEnviroScreen 4.0, 2024).

Historic freeway construction and the concentration of major east-west and north-south transportation corridors through Mid-City have fragmented neighborhoods and increased long-term exposure to mobile-source air toxics, particularly in City Heights and adjacent communities of color (Mid-City Atlas, 2025). These patterns have contributed to elevated diesel particulate matter (95th percentile) and traffic exposure (66th percentile) in the project area, resulting in cumulative air quality and noise impacts that disproportionately affect residents who lack the resources to avoid or relocate from high-exposure environments (CalEnviroScreen 4.0, 2024).

Climate-related inequities further compound these impacts. City Heights is located in one of the City's highest heat-risk zones due to low tree canopy, high impervious surface coverage, and limited access to cooling infrastructure, conditions that are more prevalent in historically disinvested neighborhoods (City of San Diego Climate Resilient SD Program, 2024; NASA DEVELOP, 2024). These environmental conditions interact with existing health disparities, resulting in disproportionate heat-related illness and mortality risk among low-income residents, seniors, and people with chronic disease.

The proposed Brownfields cleanup and reuse will directly reduce these disproportionate environmental burdens by removing legacy contamination, eliminating exposure pathways, and converting a formerly contaminated property into a climate-resilient, energy-efficient housing resource. By improving environmental conditions, reducing pollution exposure, and providing access to stable housing and supportive services in a transit-accessible location, the project will address the cumulative impacts of historic disinvestment and environmental injustice and advance equitable revitalization in a community that has long borne a disproportionate share of environmental and health risks.

Community Engagement

e. Project Involvement

f. Project Roles

Community engagement and coordination for the Swift Avenue Cleanup Project will be led by the nonprofit Applicant and project sponsor, which will serve as the primary point of contact with EPA, regulatory agencies, and the local community. The Applicant will be responsible for implementing the Community Involvement Plan, ensuring compliance with EPA public participation requirements, coordinating with regulatory and funding

partners, and incorporating community input into cleanup implementation and long-term site reuse to the maximum extent practicable. The organizations listed below represent key community, service, regulatory, and financing partners who will be meaningfully involved in decision-making, outreach, and implementation of cleanup and reuse activities, with the City Heights Area Planning Committee (CHAPC) and City Heights Community Development Corporation serving as primary community liaisons representing residents of the target area.

Name of organization/entity /group	Entity's mission	Point of contact (name & email)	Specific involvement in the project or assistance provided
City Heights Area Planning Committee (CHAPC)	Make recommendations on land use matters in City Heights	Marcellus Anderson Chapc.chair@gmail.com	Reviewed project and provided community input and letter of support. Represent TA residents.
City Heights Community Development Corporation	To partner with residents in enhancing the quality of life in City Heights	Jesse Ramirez jramirez@cityheightscdc.org	Reviewed project and provided community input and general guidance on community outreach
VA San Diego Healthcare System	Care for those who have served in our nation's military	Jonathan A. Flood Jonathan.Flood@va.gov	Will provide supportive services and case management for veteran residents.
San Diego Housing Commission	Foster social and economic stability through affordable housing	Michelle Muniz michellem@sdhc.org	Providing financing, Project-Based Vouchers, and long-term compliance oversight.
City of San Diego	Excellence in public services and community development	Monica Hardman mhardman@sandiego.gov	Providing financing, zoning, CEQA review, permitting, and infrastructure coordination.
County of San Diego Environmental Health and Quality	Public health and protect environmental quality.	Nick Macchione PHS.CHSU.HHSA@sdcounty.ca.gov	Coordination on public health protections and community health data

g. Incorporating Community Input

Community HousingWorks (CHW), in coordination with the City of San Diego and the San Diego Housing Commission (SDHC), will maintain continuous and transparent communication with the City Heights community before, during, and after cleanup activities. The Swift Avenue Apartments project was presented to the City Heights Area Planning Committee (CHAPC) on August 4, 2025, and received a letter of support by majority vote, confirming alignment with neighborhood priorities and providing an early forum for community questions and input. Feedback from this meeting resulted in the addition of a children's play area in the courtyard, and a committee recommendation to provide transit passes to residents upon move-in. CHW has since engaged multiple community partners and is actively working to secure transit passes for future residents.

This early engagement established a framework for ongoing communication and demonstrated CHW's commitment to incorporating community input throughout the project lifecycle. CHW's project management team, in coordination with environmental consultants and public agency partners, will evaluate community feedback and determine how it can be incorporated into project design, cleanup sequencing, mitigation measures, and resident services. Community input will be actively solicited where implementation flexibility exists, including the timing and sequencing of cleanup activities, communication methods, construction mitigation measures, and the design and operation of health-protective controls. While not all recommendations can be implemented, these decision points provide meaningful opportunities for community perspectives to inform how the work is carried out.

During cleanup and redevelopment, CHW and its community engagement consultant team will provide regular project updates, issued quarterly or monthly depending on project phase, with more frequent communications during active cleanup. Additional notifications will be provided at key EPA milestones, including (1) required public notices; (2) Final ABCA approval; (3) mobilization and site preparation; (4) soil removal and remediation; (5) confirmation sampling; and (6) cleanup completion. Communications will be delivered through multiple platforms, including community planning group meetings, project web pages, electronic newsletters, email alerts, and bilingual (English and Spanish) fact sheets distributed to nearby residents. These methods will ensure accessibility for linguistically isolated households and provide alternatives to in-person participation. Project updates will include schedules; construction and cleanup activities; health and safety measures; and clearly identified opportunities for community feedback at each stage. CHW will designate a project contact and community liaison to receive and respond to community questions and concerns by phone and email and will coordinate with the City Heights Area Planning Committee (CHAPC), San Diego Housing Commission (SDHC), and the City of San Diego to share information through established communication channels. All community comments will be logged in a project comment tracker, documenting the date received, topic, response, and any resulting project action. This log will inform cleanup sequencing, dust control, truck routing, and mitigation measures, and will be reported to EPA as part of required performance reporting. Where feasible, community input will be reflected in adjustments to project implementation, and summaries of community input and resulting project actions will be shared with stakeholders through follow-up meetings, written updates, and project communications, ensuring residents can see how their feedback influenced project decisions.

Community input has already begun and will continue throughout project implementation. CHW published a community notice in *The Daily Transcript* and conducted a public meeting to solicit early feedback on the proposed cleanup. Additional engagement will occur during the Final ABCA public review period, prior to cleanup, and at major remediation milestones, timed to inform decisions related to cleanup methods, sequencing, and protective measures. Outreach materials will provide clear information on contamination, health risks, dust control, and air monitoring results. Materials will be provided in English and translated into

Spanish to increase resident access to information and promote meaningful participation in the cleanup process. When community recommendations cannot be implemented due to regulatory, health and safety, funding, or other constraints, CHW will explain and document the rationale. This approach supports transparent communication and responsiveness in City Heights, a historically underserved community, where protecting public health during cleanup is critical.

This structured, bilingual, and documented engagement process ensures that residents and community organizations are continuously informed, meaningfully engaged, and able to see how their feedback directly shapes cleanup activities and health-protective measures throughout the life of the EPA-funded project.

(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

CHW has already received initial support from a Qualified Environmental Professional (QEP) to conduct a comprehensive Phase I/II ESA and prepare a draft ABCA, which offers an outline of several cleanup options for the site. Based on the findings of the Phase I and Phase II ESAs, the contaminants of concern (COCs) include organochlorine pesticides (OCPs) and Title 22 metals in soil, and benzene, trichloroethylene (TCE) and tetrachloroethylene (PCE) in soil vapor. Based on the concentrations and extent of COCs, SCS proposes the development of a Soil Management Plan (SMP) and excavation and offsite disposal of impacted soil, along with the installation of a Vapor Intrusion Mitigation System (VIMS) to prevent volatile organic compounds (VOCs) from migrating into the future residential structure. The costs for the remediation of soil impacted with OCPs and elevated concentrations of metals, as well as vapor intrusion mitigation, is beyond the available resources that CHW has available, and delays the critical services needed for housing veterans that are currently facing homelessness and mental health issues.

After evaluating each alternative offered in the ABCA, the best option identified as the most effective includes:

CHW will direct limited soils excavation and disposal and will design and oversee the installation of a passive vapor intrusion mitigation system. The removal of soil impacted with OCPs and elevated concentrations of metals is an effective way to prevent future occupants/tenants/visitors from coming into direct contact with contaminated soils present at the Site. This Alternative assumes the excavation and offsite disposal of soils containing OCPs, as well as soil with metals at concentrations exceeding health risk and hazardous waste criteria. This work, along with building construction, will eliminate the direct exposure pathway for potential residential/visitor receptors.

To mitigate the vapor intrusion risk, the Alternative assumes building construction with the coincident installation of a passive VIMS system beneath the building. The VIMS task includes design, construction quality oversight, installation, and post installation efficacy monitoring and reporting. In addition, an institutional control (land use restriction) would need to be recorded on the deed indicating the presence of the vapor barrier and stipulating that, if disturbed, it must be properly repaired (in order to meet the objective of eliminating the direct contact pathway for residents).

Description of Tasks/Activities and Outputs: The table below provides detailed information on the grant tasks to be completed during the project period, activities associated with the tasks, and anticipated outputs. A thorough review has been conducted to help ensure activities are allowable. There are no non-EPA tasks or activities proposed.

Task 1: Grant Management and Administration
a. Project Implementation: Contractor (QEP) procurement pursuant to 2 CFR 200. CHW staff will oversee grant administration activities with contractor support, including compliance with all Terms and Conditions of the Cooperative Agreement, establishing and maintaining a document repository, progress and reporting requirements (to include USEPA check-ins, quarterly and yearly reports, ACRES updates, annual and final FFRs). Task will include travel to the National Brownfields Conference in Salt Lake City, UT, and annual CALRC conferences. QEP Contractor will assist with required reporting.
b. Anticipated Project Schedule: October 2026 through end of grant (September 2030)
c. Task/Activity Lead: CHW staff member, with QEP support.
d. Outputs: 1 ABCA, (16) quarterly and annual reports, ACRES updates, regulatory compliance reporting, travel to 3 brownfields conferences, document repository
Task 2: Cleanup Planning
a. Project Implementation: QEP will finalize the ABCA; create QAPP, HASP, CAP (including SMP and review/comments); prepare bid documents for subcontractors; subcontractor selection; VIMS design; and regulatory oversight with CHW oversight.
b. Anticipated Project Schedule: December 2026 through December 2027
c. Task/Activity Lead: QEP Contractor, with CHW oversight.
d. Outputs: ABCA, QAPP, HASP, CAP/SMP, VIMS design, sufficient regulatory compliance
Task 3: Cleanup Activities
a. Project Implementation: QEP with support from qualified subcontractors will complete ACM and LBP mitigation, soil excavation/disposal, VIMS installation/CQA, post installation testing, ongoing O&M, environmental oversight, confirmation sampling, closure report, regulatory oversight and project management.
b. Anticipated Project Schedule: December 2027 through end of grant (September 2030)
c. Task/Activity Lead: QEP Contractor, with CHW oversight.
d. Outputs: Soil exaction/disposal, confirmation soil sampling, ACM and LBP mitigation, VIMS installation/CQA, post-installation efficacy monitoring and reporting, recording of deed restriction, property closure report, sufficient regulatory compliance
Task 4: Community Engagement
a. Project Implementation: Anticipated activities include a Community Involvement Plan (CIP) and 16 meetings (minimum), 5 public outreach sessions conducted, development of approximately 1,000 project

- flyer/factsheets, and updates to the project website. These activities will relate to the target site. CHW will be assisted by a community engagement contractor to be procured pursuant to 2 CFR 200.
- b. Anticipated Project Schedule:** January 2027 through end of grant (September 2030)
- c. Task/Activity Lead:** QEP Contractor, with CHW oversight.
- d. Outputs:** 14 meetings, five public outreach meetings, , project website, updated quarterly
- f. **Cost Estimates**

Budget Categories		Project Tasks (\$)				Total
		Grant Mgmt. and Administration (Task 1)	Cleanup Planning (Task 2)	Cleanup Activities (Task 3)	Community Engagement (Task 4)	
Direct Costs	Personnel	\$31,850	\$4,459	\$4,459	\$9,237	\$50,005
	Fringe Benefits	\$3,185	\$446	\$446	\$923	\$5,000
	Travel	\$15,000				\$15,000
	Contractual	\$10,000	\$85,000	\$645,300	\$76,000	\$816,300
Total Direct Costs		\$56,850	\$89,459	\$649,759	\$85,237	\$881,305
Indirect Costs		\$3,185	\$446	\$446	\$923	\$5,000
Total Budget		\$60,035	\$89,905	\$650,205	\$86,160	\$886,305

Task 1, Grant Management and Administration

- **Personnel Costs:** 500 staff hours at an average rate of \$63.70 = \$31,850
- **Fringe Benefits:** 10% fringe benefits at 500 staff hours at an average rate of \$6.37 = \$3,185
- **Travel:** total of \$15,000 (\$1,500 airfare + \$2,250 hotel + \$1,250 per diem x 3) has been budgeted to this task for CHW staff to travel to the National Brownfields Conference and local brownfields conferences and events.
- **Contractual:** 50 hours at average rate of \$200=\$10,000

Task 2, Cleanup Planning

- **Personnel Costs:** 70 staff hours at an average rate of \$63.70 = \$4,459
- **Fringe Benefits:** 10% fringe benefits at 70 staff hours at an average rate of \$6.37 = \$446
- **Contractual Costs:** QAPP, Community Health and Safety Plan = \$20,000, ABCA = \$15,000, Corrective Action Plan (CAP) with Soil Management Plan (SMP); including response to regulatory comments = \$20,000, Vapor Intrusion Mitigation System (VIMS) Design = \$25,000, Regulatory Oversight = \$5,000 = \$85,000

Task 3, Cleanup Activities

- **Personnel Costs:** 70 staff hours at an average rate of \$63.70 = \$4,459
- **Fringe Benefits:** 10% fringe benefits at 70 staff hours at an average rate of \$6.37 = \$446
- **Contractual Costs:** Soils Excavation, Transport and Disposal = \$45,000; Laboratory analyses, confirmation soil samples = \$10,000; ACM and LBP Mitigation = \$214,000; VIMS Installation (12,600 square feet @ \$8/square foot) = \$100,800; VIMS Installation CQA = \$25,000; Post-Installation Testing (2 events @ \$30,000) = \$60,000; Ongoing O&M (5 events @ \$17,500/event) = \$87,500; Environmental Oversight (5 days @ \$2,000 per day)=\$10,000; Confirmation Soil Sample Laboratory Costs = \$10,000; Closure Report, including response to regulatory comments = \$20,000; Project Management (200 hours @ \$200/hour) = \$40,000; Regulatory Oversight = \$33,000.

Task 4, Community Engagement

- **Personnel Costs:** 145 staff hours at an average rate of \$63.70 = \$9,237
- **Fringe Benefits:** 10% fringe benefits at 145 staff hours at an average rate of \$6.37 = \$923
- **Contractual Costs:** Community engagement consultant task 1 – Final ABCA Public Review and Comment Process = \$13,500, task 2 – Ongoing Community Engagement During Cleanup = \$15,000 and ongoing annual engagement @ \$9,000/year x 3 = \$18,000, task 3 – EPA Reporting and Engagement Documentation = \$10,500 = total of \$66,000. QEP 50 hours at an average rate of \$200/hour=\$10,000.

g. Plan to Measure and Evaluate Environmental Progress and Results

CHW, the California Department of Toxic Substances Control (DTSC), and EPA, will track and evaluate project progress using milestones tied to the approved cleanup work plan, schedule, and budget. Key outputs will include completion of remedial action planning, soil removal and/or treatment, confirmation sampling, waste disposal, and DTSC regulatory closure, documented through field reports, laboratory data, and final remedial action reports. Progress will be reported in EPA quarterly performance and financial reports and entered into the ACRES database.

Results will be measured by achieving DTSC and EPA risk-based cleanup standards for residential use and eliminating exposure pathways, as confirmed through regulatory approval and site closure documentation. Metrics will also include prevention of human exposure to hazardous materials and the creation of safe, publicly accessible spaces, as CHW demonstrated at the Paradise Creek Educational Park. At Paradise Creek, CHW oversaw removal of contaminated soils from a half-mile stretch of creek, salvaged and restored wetland plants, and created new upland habitats and recreational facilities. This remediation enabled safe use by schoolchildren and the surrounding community while providing an educational and ecological resource.

Long-term outcomes will be evaluated through successful redevelopment and occupancy of the site as affordable and permanent supportive housing, demonstrating that a formerly contaminated property has been returned to safe, productive use. CHW will track construction completion, occupancy, and long-term compliance as part of their ongoing asset management and regulatory reporting systems, while also considering broader community and ecological benefits realized from adjacent site enhancements, as exemplified by CHW's integration of environmental restoration, public education, and recreational use at Paradise Creek.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure

Swift Avenue Housing Associates, L.P. (“Swift Avenue LP”) is a single-asset limited partnership formed to own, remediate, and develop Swift Avenue Apartments. The Partnership is governed by a Managing General Partner structure that ensures full nonprofit oversight, financial accountability, and compliance with all federal requirements.

The Managing General Partner is CHW Swift Avenue, LLC, a California limited liability company whose sole member and manager is Community HousingWorks (CHW), a California nonprofit public benefit corporation. Through this structure, CHW retains full authority to manage the Partnership, execute contracts, receive and disburse grant funds, and ensure compliance with all federal, state, and local program requirements.

Under the Limited Partnership Agreement, the Managing General Partner is legally responsible for day-to-day operations of the Partnership, including entering into and enforcing contracts, paying all Partnership expenses, maintaining records, overseeing construction and environmental remediation, and preparing and submitting all reports required by lenders and government agencies. The General Partner also maintains all financial records, bank accounts, audited financial statements, and compliance documentation for the Partnership.

Esperanza Community Housing and Community Development Corporation (Esperanza) is a wholly controlled 501(c)(3) affiliate of CHW. Esperanza’s annual financial statements are consolidated with CHW, while its Form 990 income tax return is separately filed. Esperanza acts as a limited partner and sole managing member for various real estate project entities, allowing CHW to distinguish parent operational activity from portfolio investment and ownership.

CHW will designate a Project Manager and compliance staff to oversee EPA-funded activities, maintain documentation, approve expenditures, and submit all required technical, financial, and performance reports. Weekly project meetings, formal approval protocols, and CHW’s internal financial controls will ensure that EPA funds are expended appropriately, tracked accurately, and reported in accordance with 2 CFR Part 200.

This ownership and management structure ensures that the federally funded cleanup is implemented by a financially accountable nonprofit developer with full legal authority, audited financial systems, and long-term responsibility for the property.

b. Description of Key Staff

Kevin Leichner – Senior Vice President of Housing and Real Estate Development

Kevin Leichner will provide overall leadership and executive oversight for the grant, ensuring compliance with EPA cooperative agreement requirements, integration of environmental remediation with redevelopment planning, and coordination with regulatory agencies. He brings extensive experience in affordable housing development, public-private financing, and complex redevelopment projects, with responsibility for strategic direction, risk management, and senior-level reporting.

Steve Swiecicki – Vice President of Forward Planning

Steve Swiecicki will provide guidance on project planning and coordination, ensuring that cleanup activities align with CHW’s housing and redevelopment objectives. He brings expertise in affordable housing development, project implementation, and stakeholder coordination.

Annamarie Rodriguez – Project Manager

Annamarie Rodriguez will manage day-to-day implementation of the cleanup grant, including coordination with environmental consultants and contractors, schedule and budget tracking, and preparation of technical and progress reports. She has significant experience overseeing affordable housing and redevelopment projects funded with state and federal sources, and is responsible for ensuring adherence to workplans, regulatory requirements, and reporting schedules.

Diana Bustos – Assistant Project Manager

Diana Bustos will support daily project coordination, track milestones, assist with procurement and consultant management, and prepare supporting documentation for EPA reporting and compliance. She will help ensure timely submittals, accurate recordkeeping, and internal coordination among project partners.

Jenilee Cabading – Vice President of Finance & Accounting

Jenilee Cabading will provide financial oversight and internal controls for the grant, including cost allowability, drawdown compliance, audit readiness, and adherence to 2 CFR Part 200. She brings more than two decades of experience in nonprofit and real estate development finance and oversees CHW’s systems for tracking, reporting, and documenting federal funds.

Community HousingWorks Accounting Team

CHW’s accounting staff will track all grant expenditures, prepare reimbursement requests, maintain supporting documentation, and ensure compliance with EPA financial management and record retention requirements, under the supervision of the Chief Financial Officer and senior management.

c. Acquiring Additional Resources

The organization follows a structured process to acquire the expertise and resources needed to complete the project. Project needs are assessed to identify gaps in technical, administrative, or financial capacity. Based on this assessment, needs are addressed primarily through contractors, in accordance with EPA NOFO definitions and 2 CFR 200.

For contractors, multiple bids are requested from qualified vendors, with follow-up calls or interviews conducted as needed. Costs, scope, and other relevant factors are reviewed before selecting the vendor that best meets project needs. Contracts clearly define scope of work, deliverables, timelines, and reporting requirements. Contractor performance is managed under the oversight of the Director of Housing and Real Estate Development and the Project Manager to ensure compliance with federal procurement rules.

Subrecipients are not currently envisioned to be necessary for this project. If a subrecipient becomes needed, the organization would evaluate their capacity, past performance, and financial stability. Subaward agreements would clearly define responsibilities, reporting obligations, and adherence to federal and EPA requirements. The Project Manager and Assistant Project Manager would monitor subrecipient performance through regular check-ins, progress reporting, and financial oversight.

All procurement, selection, and subaward activities are documented in internal systems to ensure transparency, accountability, and compliance with EPA requirements throughout the grant period.

Past Performance and Accomplishments

e. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Financial Assistance Agreements

a. Purpose and Accomplishments

Community HousingWorks (CHW), founded in 1988, has developed 5,185 rental apartments across 54 communities in California and Texas. CHW leverages federal, state, and local funding and has extensive experience, dedicated staff and systems in place to manage complex financing and regulatory requirements.

One example demonstrating CHW's ability to manage federally funded and environmentally significant projects is Paradise Creek II, completed in 2018 in National City, California. One important funding source was the EPA/HUD/DOT Sustainable Communities grant for \$500,000, one of only five awarded nationwide and the only Pacific Coast award, supporting environmental assessment, remediation coordination, and community engagement on a historically contaminated infill site along Paradise Creek. CHW successfully coordinated remediation strategies under California DTSC oversight, integrated pedestrian- and transit-oriented design, and incorporated community-serving features such as public open space, after-school programming, and a nonprofit lending and education office. Paradise Creek II has received LEED-Neighborhood Development designation and serves as a model for environmentally responsible, community-driven redevelopment. The project also leveraged 4% Low-Income Housing Tax Credits, Affordable Housing and Sustainable Communities (AHSC) Program funding, State Infill Infrastructure Grant (IIG) funds, and a City of National City loan to complete the financing stack and ensure project feasibility.

Building on this experience, CHW's more recent developments demonstrate continued expertise in administering federal and state funding, managing layered regulatory requirements, and delivering affordable housing with integrated environmental and community benefits.

In 2025, Community HousingWorks (CHW) completed Jacaranda on 9th, an 88-unit affordable housing development in the Cortez Hill neighborhood of downtown San Diego. One primary funding source was project-based rental assistance vouchers, with 87 units supported by Housing Assistance Payment (HAP) contract awarded through the San Diego Housing Commission (SDHC). CHW successfully managed all phases of development, including financing coordination, construction oversight, lease-up, and ongoing compliance with HAP requirements. The project also leveraged additional funding sources, including 4% Low-Income Housing Tax Credits and local loans. Outcomes include full occupancy of all units, integration of supportive services for residents experiencing homelessness, and long-term affordability secured through the HAP contract and recorded affordability restrictions.

Keeler Court, completed in 2022 in the Southcrest neighborhood of San Diego, further illustrates CHW's capacity to administer complex public funding. The project received a \$9,934,273 award through California's Affordable Housing and Sustainable Communities (AHSC) Program, administered by the California Strategic Growth Council (SGC). As a condition of this funding, CHW and the California Department of Housing and Community Development (HCD) entered into a standard agreement, as well as a regulatory agreement governing the maintenance, use and occupancy of the development. CHW has ensured compliance with these agreements, project milestones, and sustainability objectives. Key accomplishments include completion and stabilization of units, implementation of AHSC-funded sustainable transportation and infrastructure improvements, and measurable benefits toward greenhouse gas reductions and long-term housing affordability consistent with AHSC goals. The project also incorporated Low-Income Housing Tax Credits and other public financing.

b. Compliance with Grant Requirements

Community HousingWorks (CHW) has a strong record of compliance with all workplans, schedules, and terms and conditions associated with its financial assistance agreements.

For Paradise Creek II (completed in 2018), CHW adhered to the EPA/HUD/DOT Sustainable Communities grant requirements, coordinating environmental assessment and remediation planning under California DTSC oversight. CHW maintains documentation of project milestones and deliverables, as required under the EPA/HUD/DOT Sustainable Communities grant.

For Jacaranda on 9th (completed in late 2025), CHW continues to comply with the Housing Assistance Payment (HAP) contract administered by SDHC. All 87 units receiving project-based vouchers are monitored for ongoing compliance with HAP requirements, including timely reporting, lease-up documentation, and occupancy verification. CHW ensures that any adjustments or updates to reporting or operational requirements are addressed promptly and documented. Prior to project completion, any schedule adjustments related to construction sequencing were proactively communicated to SDHC, and all required updates were documented and implemented in coordination with the agency to ensure a smooth transition to operations and lease-up.

For Keeler Court (completed in 2022), CHW continues to manage the AHSC standard and regulatory agreements, achieving necessary milestones for affordable housing delivery, sustainable transportation improvements, and reporting obligations. Required reporting under the AHSC agreements address project progress, AHSC-funded transportation improvements, and long-term affordability restrictions.

Across these and other projects, CHW has demonstrated consistent reporting, adherence to workplans, and effective communication with awarding agencies. Adjustments required during project implementation were addressed promptly through documented corrective actions, ensuring projects met their stated objectives and complied fully with grant requirements.

FY 2026 Cleanup Grant Threshold Criteria Community Housing Works

1. Applicant Eligibility:

- a) Swift Avenue Housing Associates, L.P. is the applicant for this EPA Brownfields Cleanup Grant (Grant). Swift Avenue Housing Associates, L.P. (“Applicant”) is a single-asset limited partnership formed to own, remediate, and develop Swift Avenue Apartments. The Partnership is governed by a Managing General Partner structure that ensures full nonprofit oversight, financial accountability, and regulatory compliance. The Managing General Partner is CHW Swift Avenue, LLC, a California limited liability company whose sole member and manager is Community HousingWorks (CHW), a California nonprofit public benefit corporation that has a tax-exempt status under section 501(c)(3) of the IRC. Through this structure, CHW retains full authority to manage the Partnership, execute contracts, receive and disburse grant funds, and ensure compliance with all federal, state, and local program requirements. As such, the experience and qualifications of CHW is described throughout this application to demonstrate capacity to successfully carry out the Grant activities. Documentation is attached in Appendix A. Organization charts and additional information have been included in Appendix B.
- b) Swift Avenue Housing Associates, L.P., and CHW are not exempt from Federal taxation under section 501(c)(4) of the IRC. Therefore, this criterion is not applicable.

2. Previously Awarded Cleanup Grants:

CHW affirms that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds:

CHW does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership:

CHW acquired the property proposed in this cleanup grant application on November 6, 2023 (see Title Report attached in Appendix C).

5. Basic Site Information:

- a) Name of the site: 4017 and 4021 Swift Avenue
- b) Address of the site: 4017 and 4021 Swift Avenue, San Diego, CA 92104

6. Status and History of Contamination at the Site:

- a) Type of Contamination: Hazardous substances and petroleum products
- b) Operational History and Current Use(s): Based on information obtained during the preparation of the *Phase I Environmental Site Assessment, 4017 to 4021 Swift Avenue, San Diego, California 92104, Assessor's Parcel Numbers (APNs): 447-390-12 and 447-390-13*, dated June 1, 2023, prepared by SCS Engineers (Phase I ESA), the Site has been occupied by two single-family residences (SFR) since at least 1943. The structures were present during a time-period when lead-based paint (LBP) was in common use, and organochlorine pesticides (OCPs) were routinely applied around buildings as termiticides/pesticides. Therefore, the Phase I ESA concluded that there is the potential for OCPs and lead to be present in soil surrounding the structures. Additionally, during this time-period, the burning of trash in backyard incinerators was a common practice; therefore, there is the potential for elevated metals to be present in the backyard soils in connection with burn ash. The Phase I ESA also identified the presence of off-site automotive repair facilities in the vicinity of the Site, as well as a former gasoline service station on the adjoining property to the south with no records of underground storage tanks (USTs) having been removed. Based on the nature of these operations, it is possible that unidentified unauthorized releases may have occurred at these facilities, which may have impacted the subsurface. Based on these findings, additional assessment was conducted.
- c) Environmental Concerns: OCPs; LBP; ACM; elevated metals including lead, copper, nickel, zinc, and silver; benzene, trichloroethylene (TCE), tetrachloroethylene (PCE), and unknown USTs on an adjoining property.
- d) How the Site Became Contaminated: As previously stated above, the two existing structures that were built prior to 1943 when LBP and ACM were common building materials. OCPs were routinely applied around buildings as termiticides/pesticides. Additionally, during this time-period, the burning of trash in backyard incinerators was common, therefore, there is potential for elevated metals to be present in the backyard soils in connection with burn ash. The Phase I ESA also identified the presence of off-site automotive repair facilities in the vicinity of the Site, as well as a former gasoline service station on the adjoining property to the south with no records of USTs having been removed. Based on the nature of these operations, it is possible that unidentified unauthorized releases may have occurred at these facilities, which may have impacted the subsurface.

7. Brownfield Site Definition:

CHW affirms:

- a) This site is not listed, or proposed for listing, on the National Priorities List
- b) This site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA
- c) This site is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications:

CHW has conducted both a Phase I and II ESAs to help determine recent environmental conditions at the site. A Phase I ESA was conducted on June 1, 2023, in accordance with ASTM E1527 standards. A Phase II ESA, conducted in accordance with ASTM E1903-19 was completed on September 19, 2023, and an additional Phase II ESA (ASTM E1903-19) was completed on May 13, 2025, to further evaluate site conditions.

9. Site Characterization:

CHW affirms that there will be a sufficient level of site characterization from the environmental site assessment performed before June 15, 2026, for the remediation work to begin on the site.

10. Enforcement or Other Actions:

There is no ongoing or anticipated environmental enforcement or other actions related to the site for which brownfields grant funding is being requested for. There are no anticipated environmental enforcement or other actions related to the site, or any inquiries, or orders from federal, state, or local government entities that the applicant is aware of for the contamination, or hazardous substances at the site, including any liens.

11. Sites Requiring a Property-Specific Determination:

CHW staff affirm that the site does not need a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

This site is contaminated with both hazardous substances and petroleum.

- a) Property Ownership Eligibility – Hazardous Substance Sites:

CHW meets the requirements for asserting affirmative defense to CERCLA through the bona fide prospective purchaser liability protection at the site. Sections i and ii do not apply to this site.

- iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY
 - (1) Bona Fide Prospective Purchaser Liability Protection

CHW asserts Bona Fide Prospective Purchaser (BFPP) Liability Protection at this site and demonstrates compliance with the following requirements:

- CHW acquired title to the property on November 6, 2023.
- CHW conducted all appropriate inquiries (AAI) prior to acquiring the property by conducting a Phase I ESA in compliance with ASTM E1527 standards in place at that time. The report was dated on June 1, 2023, and was conducted within 180 days before site acquisition. The Phase I ESA was completed by an EP.
- CHW is not liable for any contamination at the site or affiliated with any person potentially liable for this contamination.
- All disposal of hazardous substances at the site occurred before CHW acquired the site.
- CHW is taking appropriate care through reasonable steps to address any releases, or future release, and exposures to hazardous substances on the site.
- CHW is complying with any land use restrictions and will not impede the effectiveness or integrity of any institutional controls associated with response actions on the site.
- CHW will provide full cooperation, assistance, and access to any authorized persons.
- CHW will comply with any CERCLA information requests and administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.
- CHW will not impede performance of a response action or natural resource restoration.

(a) Information on the Property Acquisition

The following provides details on the property acquisition:

- (i) CHW acquired the property by voluntary purchase.
- (ii) CHW acquired the property on November 6, 2023
- (iii) CHW is the sole owner by fee simple purchase.
- (iv) The property was purchased from Swift Avenue Development Holding Company, LLC
- (v) CHW does not have any familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators (or other potentially responsible parties) of the property (including the person or entity from which we acquired the property).

(b) Pre-Purchase Inquiry

- (i) CHW conducted an ASTM E1527-21 Phase I ESA, dated on June 1, 2023, prior to acquiring the property. An ASTM Phase II ESA was completed on September 19, 2023, and a supplemental Phase II completed on May 13, 2025.
- (ii) The Phase I ESA was performed by an EP.
- (iii) The ASTM E1527 Phase I ESA was completed within 180 days before CHW's acquisition of the property, as required under the bona fide prospective purchaser provision.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

Any disposal of hazardous substances at the site occurred before CHW acquired ownership of the property. CHW did not cause or contribute to any release of hazardous substances at the site. CHW has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

Since CHW has acquired the property, it has remained as two occupied structures, which will be relocated prior to demolition.

(e) Continuing Obligations

Since the identification of metals-impacted soil during the Phase II Environmental Site Assessment, Community HousingWorks has evaluated whether additional interim measures were necessary to prevent or limit potential exposure. Based on the finding of the Phase I and Phase II assessments, no immediate health or safety concerns were identified, and no additional reasonable steps were determined to be warranted at this time. The site has remained undisturbed since completion of the investigations, with no soil disturbance, grading, or impacts to existing foundations that could increase exposure potential.

With respect to vapor intrusion, site conditions and the contaminants identified during the Phase I and Phase II Environmental Site Assessments did not indicate the presence of volatile organic compounds or pathways at concentrations that would warrant further evaluation or implementation of interim vapor intrusion mitigation measures. Accordingly, no vapor intrusion mitigation measures have been implemented to date.

CHW affirms that it will:

- (i) complying with any land use restrictions and not impeding the effectiveness or integrity of any institutional controls;

- (ii) assisting and cooperating with those performing the cleanup and providing access to the property;
- (iii) complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- (iv) providing all legally required notices.

iv. SITES WITH HAZARDOUS BUILDING MATERIAL THAT IS NOT RELEASED INTO THE ENVIRONMENT

- 1. Asbestos and lead-based paint surveys have not yet been conducted but will be completed prior to June 15th, 2026. Based on the age of the structures, it is likely that asbestos containing materials and lead-based paint are present.

b. Property Ownership Eligibility – Petroleum Sites

A petroleum site determination form has been received from the DTSC, see Appendix E.

i. INFORMATION REQUIRED FOR A PETROLEUM SITE ELIGIBILITY DETERMINATION

- 1. Current and Immediate Past Owners:
 Current owner: Swift Avenue Housing Associates, L.P.
 Immediate past owner: Swift Avenue Development Holding Company, LLC
 Prior owner: John Joseph Farrell
- 2. Acquisition of Site: The property was purchased on November 6, 2023.
- 3. No Responsible Party for the Cleanup of the Site: CHW did not dispense or dispose of petroleum or petroleum product contamination and did not exacerbate the existing petroleum contamination at the site. The petroleum contamination is presumed to be from an offsite source.
- 4. Cleaned Up by a Person Not Potentially Liable: CHW did not dispense or dispose of petroleum or petroleum products, or exacerbate the existing petroleum contamination at the site, and have taken reasonable steps with regard to the contamination at the site.
- 5. Judgments, Orders, or Third-Party Suits: No responsible party, including CHW, is identified as potentially liable for cleaning up the site, through either:
 - a) a judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the site; or

- b) an enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or clean up the site; or
- c) a citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner of the site, that would, if successful, require the assessment, investigation, or cleanup of the site.

13. Cleanup Authority and Oversight Structure:

- a) Describe how CHW will oversee cleanup at the site:
CHW will hire a qualified environmental consulting firm to develop a soil management plan, conduct remedial excavation, and design and install the vapor intrusion mitigation system. There will be close coordination with the general contractor and the environmental consultant to ensure the proper management and handling of soils in accordance with the Soil Management Plan. The site cleanup will be overseen by a regulatory oversight agency such as the California Department of Toxic Substances Control (DTSC), the San Diego Regional Water Quality Control Board (SDRWQCB), or other qualified regulatory oversight agency. CHW's environmental consultant will respond to agency comments and will implement agency directives, as necessary. The oversight agency has not yet been determined.
- b) Cleanup response activities: Dust monitoring will be conducted at the site perimeter during remedial excavation activities, and signage will be affixed to the fencing around the perimeter to provide information to the community regarding the remedial activities. A Community Health and Safety Plan will be developed to provide the steps to be taken to limit exposure to the surrounding properties during the remedial excavation.

14. Community Notification

Community HousingWorks (CHW), in coordination with the City of San Diego and the San Diego Housing Commission (SDHC), will maintain continuous and transparent communication with the City Heights community before, during, and after cleanup activities. The Swift Avenue Apartments project was presented to the City Heights Area Planning Committee (CHAPC) on August 4, 2025, and received a letter of support by majority vote, confirming alignment with neighborhood priorities and providing an early forum for community questions and input. Feedback from this meeting resulted in the addition of a children's play area in the courtyard, and a committee recommendation to provide transit passes to residents upon move-in. CHW has since engaged multiple community partners and is actively working to secure transit passes for future residents.

This early engagement established a framework for ongoing communication and demonstrated CHW's commitment to incorporating community input throughout the project lifecycle. CHW's project management team, in coordination with environmental consultants

and public agency partners, will evaluate community feedback and determine how it can be incorporated into project design, cleanup sequencing, mitigation measures, and resident services. Community input will be actively solicited where implementation flexibility exists, including the timing and sequencing of cleanup activities, communication methods, construction mitigation measures, and the design and operation of health-protective controls. While not all recommendations can be implemented, these decision points provide meaningful opportunities for community perspectives to inform how the work is carried out.

During cleanup and redevelopment, CHW and its community engagement consultant team will provide regular project updates, issued quarterly or monthly depending on project phase, with more frequent communications during active cleanup. Additional notifications will be provided at key EPA milestones, including (1) required public notices; (2) Final ABCA approval; (3) mobilization and site preparation; (4) soil removal and remediation; (5) confirmation sampling; and (6) cleanup completion. Communications will be delivered through multiple platforms, including community planning group meetings, project web pages, electronic newsletters, email alerts, and bilingual (English and Spanish) fact sheets distributed to nearby residents. These methods will ensure accessibility for linguistically isolated households and provide alternatives to in-person participation. Project updates will include schedules; construction and cleanup activities; health and safety measures; and clearly identified opportunities for community feedback at each stage. CHW will designate a project contact and community liaison to receive and respond to community questions and concerns by phone and email and will coordinate with the City Heights Area Planning Committee (CHAPC), San Diego Housing Commission (SDHC), and the City of San Diego to share information through established communication channels. All community comments will be logged in a project comment tracker, documenting the date received, topic, response, and any resulting project action. This log will inform cleanup sequencing, dust control, truck routing, and mitigation measures, and will be reported to EPA as part of required performance reporting. Where feasible, community input will be reflected in adjustments to project implementation, and summaries of community input and resulting project actions will be shared with stakeholders through follow-up meetings, written updates, and project communications, ensuring residents can see how their feedback influenced project decisions.

Community input has already begun and will continue to throughout implementation of the project. In advance of the application, CHW published two community notices in The Daily Transcript on January 12th and 13th, 2026, in compliance with the notification requirements, and conducted a public community meeting to solicit early feedback on the proposed cleanup. The notification provided instructions for how to access, review, and comment on the Narrative and Draft ABCA as well as the date, time, and location of the public meeting. Community input will continue to be formally solicited during the Final ABCA public review period after award, prior to the start of cleanup activities, and again at major remediation milestones. These engagement points are intentionally timed to align with decisions related to cleanup methods, sequencing, and protective measures, allowing community input to inform how the cleanup is implemented. Outreach materials will include clear explanations of contamination, health risks, dust control measures, and air monitoring results, with Spanish

translation to ensure residents can understand potential exposures and protections during cleanup. When community recommendations cannot be implemented due to regulatory, health and safety, funding, or other constraints, CHW will provide a clear explanation to stakeholders and document the rationale as part of its engagement record. This approach is important in City Heights, a historically underserved community, where transparent communication and responsiveness to community concerns are critical to protecting public health during cleanup activities.

This structured, bilingual, and documented engagement process ensures that residents and community organizations are continuously informed, meaningfully engaged, and able to see how their feedback directly shapes cleanup activities and health-protective measures throughout the life of the EPA-funded project.

- a) Draft ABCA: A copy of the draft ABCA, along with the grant application, was provided to the public for review at a community meeting on January 12, 2026. Instructions were provided on how to access the grant application and draft ABCA prior to final submittal. Draft ABCA is provided in Appendix F.
- b) Community Notification Ad: CHW provided the required notification, including advertising CHW's intent to apply for cleanup funding, and details of the meeting, on January 12, 2026 and again on January 13, 2026. This meeting was advertised in The Daily Transcript.
- c) Public Meeting: A public meeting to discuss the ABCA and cleanup grant application was held on January 21, 2026. There were not attendees outside of the project team, CHW was prepared to give a brief presentation on the project and respond to questions and comments.
- d) Submission of Community Notification Documents: Proof of the advertising methods, meeting notes, meeting agenda, proof of attendance, sign-in sheet, and a copy of the draft ABCA are included in Appendix G. The meeting was open to the public, and no comments were received.

15. Contractors and Named Subrecipients

Contractors: N/A

Subrecipients: N/A



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
5796 Corporate Avenue
Cypress, California 90630



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

January 22, 2026

Lisa Hanusiak
Regional Brownfields Coordinator
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California, 94105
hanusiak.lisa@epa.gov

ACKNOWLEDGEMENT AND SUPPORT OF A UNITED STATES ENVIRONMENTAL PROTECTION AGENCY FY26 BROWNFIELD CLEANUP GRANT APPLICATION FOR \$600,000

Dear Ms. Hanusiak:

The Department of Toxic Substances Control (DTSC) of the California Environmental Protection Agency acknowledges and supports Community HousingWorks (Swift Avenue Housing Associates, L.P.)'s application for a United States Environmental Protection Agency (USEPA) Brownfield Cleanup Grant (USEPA Grant) for the property located at 4017 and 4021 Swift Avenue in San Diego, San Diego County, California (Site). Community HousingWorks is requesting a funding amount of \$600,000 to cover the cost of environmental cleanup activities at the Site.

Swift Avenue Housing Associates, L.P. is a wholly owned affiliate of Community HousingWorks and all parties are 501(c)(3) nonprofit organizations. The Site has been developed with residential structures since at least 1943. Historical uses and surrounding land uses identified in the Phase I ESA indicate potential legacy contamination associated with lead-based paint, historical pesticide and termiticide application (organochlorine pesticides), backyard burn ash, and potential off-site impacts from adjacent automotive and former gasoline service station operations. Subsequent Phase II investigations confirmed the presence of metals, pesticides, and soil vapor contamination requiring remedial action to support residential reuse.

With the USEPA Grant funding, Community HousingWorks (Swift Avenue Housing Associates, L.P.) would like to pay for excavation and off-site disposal of soil impacted with metals and other constituents exceeding residential health risk and hazardous waste criteria, install a passive vapor intrusion mitigation system beneath the proposed residential building, confirmation soil sampling, preparation and implementation of a corrective action plan, hazardous building materials surveys and abatement prior to demolition, regulatory documentation, reporting and DTSC oversight fees, grant management, contractor procurement, construction quality assurance, and community engagement related to cleanup activities.

Community HousingWorks (Swift Avenue Housing Associates, L.P.) is eligible to enter into a DTSC voluntary agreement and has indicated that, if funded, they plan to enter into a voluntary agreement with DTSC to oversee the proposed cleanup. If the applicant enrolls in a voluntary agreement and is successful in their funding request, DTSC will make every effort possible to ensure that characterization and cleanup will be completed within the USEPA funding term.

DTSC looks forward to the possible award of the USEPA Grant to Community HousingWorks (Swift Avenue Housing Associates, L.P.) to facilitate the success of the environmental clean-up of the Site. DTSC is ready to provide the necessary technical support and regulatory oversight, as needed, for the Site covered by the USEPA Grant. If you need further information or assistance regarding specific brownfield sites, or any of DTSC's brownfields programs, please feel free to contact me via phone at (714) 484-5430 or via email at anthony.rosas@dtsc.ca.gov.

Sincerely,



Anthony Rosas
Regional Brownfield Coordinator
Site Mitigation and Restoration Program

cc: Maryam Tasnif-Abbasi
Brownfield Development Manager
Site Mitigation & Restoration Program
Maryam.Tasnif-Abbasi@dtsc.ca.gov