

A yellow-tinted photograph of a dirt path in a wooded area. Two people are walking away from the camera on the path. The scene is filled with trees and dense foliage. The overall color scheme is a uniform yellow, giving it a monochromatic appearance.

**APPENDIX E –
A PRIMER ON LUST SITES**

APPENDIX E – A PRIMER ON LEAKING UNDERGROUND STORAGE TANK (LUST) SITES

LUST sites, often located at former gas stations, present unique opportunities to develop community parks in areas lacking green space and facing environmental contamination. Transforming these degraded lands into parks is both a public health strategy and a park equity strategy—reducing pollution impacts while delivering physical, mental, social, and environmental health benefits.

This summary is based on an Applied Planning Research Project by UCLA graduate student Danielle Paulazzo, in partnership with MIG. Paulazzo’s research directly informed the PNA+ Implementation Plan, particularly strategies related to remediating degraded lands like LUST sites. **For more information or a copy of the full report, contact Danielle Paulazzo at dpaulazzo@g.ucla.edu.**

KEY FINDINGS

- » Many LUST sites are relatively easy to remediate compared to other contaminated lands and are well-suited to bioremediation methods, making them strong candidates for park redevelopment.
- » Regulatory and funding mechanisms for site cleanup and redevelopment are complex, but they do exist.
- » The most promising LUST sites for park reuse are those with community buy-in, shallow soil contamination, predictable cleanup timelines, favorable site conditions, and potential for bioremediation.
- » Most sites are progressing through cleanup without external intervention; while some may be suitable for parks, LUST sites alone are not a scalable solution for drastically increasing parks in areas of highest need.
- » The State Water Resources Control Board and Regional Water Quality Control Boards can provide essential, site-specific information beyond what is publicly available online.

WHAT ARE LUST SITES?

Underground Storage Tanks (USTs)—some leaking and some not—are regulated by the EPA and are defined as tanks and connected piping used to store hazardous substances underground. Most USTs contain petroleum and are typically associated with gas stations or facilities requiring on-site fuel storage. When leaks or unauthorized releases occur, contaminants can infiltrate the soil and groundwater. Cleanup costs can range from \$10,000 for low-risk sites to millions for high-risk, complex cleanups.

In response to a cleanup backlog, the EPA and California State Water Resources Board launched the Stalled LUST Case Initiative in 2018. This partnership increased funding and administrative capacity to resolve long-standing cases. Because petroleum is easier to remediate than other hazardous substances, and thanks to targeted resources, California has successfully resolved 95% of historic UST releases. However, a subset of sites remains in the backlog due to stalled progress or unnecessarily slow cleanup.

This analysis focused on identifying suitable sites and evaluating the financial and environmental feasibility of park redevelopment. Petroleum LUST sites respond well to bioremediation—an approach that treats the soil on-site, avoids costly and disruptive excavation, and builds community trust through less invasive and more participatory processes.

COMMUNITY CONSIDERATIONS

Park projects on remediated lands must begin with community engagement. Residents may be concerned about green gentrification or skeptical about the effectiveness of remediation. Failed cleanups in nearby areas can deepen distrust. For a site to succeed as a park, community support is essential.

LUST SITES IN LA COUNTY

As of June 2025:

- » 314 LUST sites are open
- » 81 are considered stalled (i.e., little to no progress in remediation)
- » 50 of the stalled sites are located in disadvantaged communities (75th percentile or higher in CalEnviroScreen 4.0)

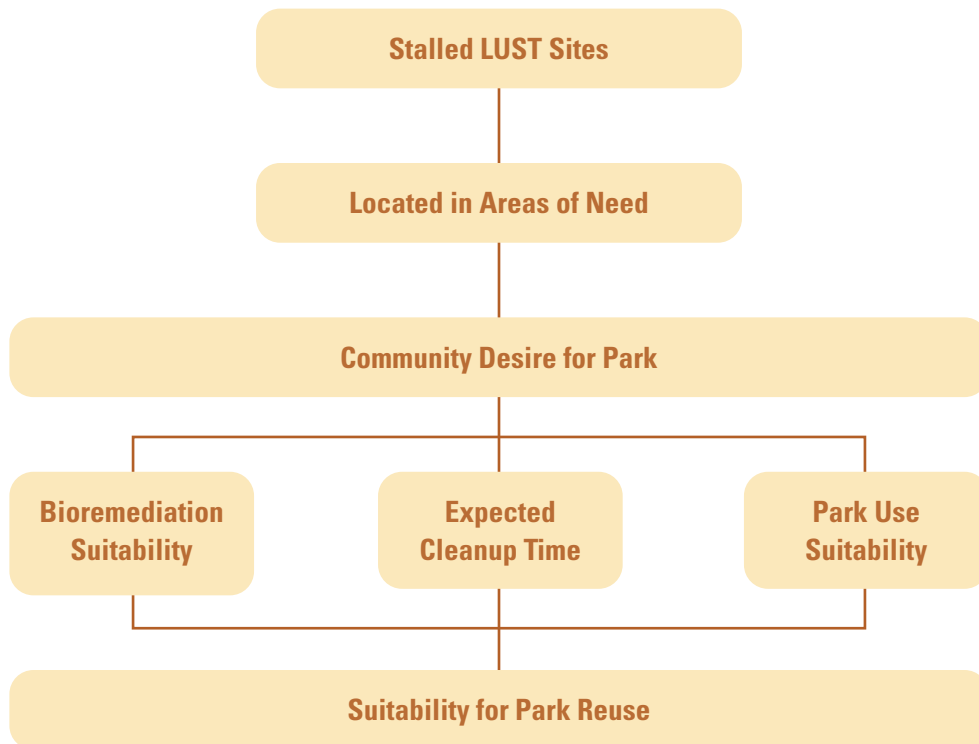
The PNA+ Implementation Plan maps identify 99 LUST sites located in high-need areas. Some are stalled; others are active. Statuses may change rapidly, so confirmation is needed before taking further steps.

Key site considerations include:

- » Alignment with park-need priority areas
- » Community interest and support
- » Surrounding land use
- » Site size and slope

RESTORATION FEASIBILITY FRAMEWORK

Paulazzo proposes a step-by-step framework to evaluate LUST sites for park conversion. Together, these factors provide a structured way to determine whether a site is viable for redevelopment into a community park.



Park use suitability considerations include property size, adjacent land uses, facility feasibility, slope, etc.

Paulazzo's report also outlines funding streams for LUST cleanup, each with distinct eligibility criteria, especially for non-responsible parties or prospective purchasers.

KEY CONTACTS

Given the complexity of the process, community-based organizations should consider working with LA County DPR or other public partners. The following experts at the State and Regional Water Boards are valuable resources:

- » **Dayna Cordano (Dayna.Cordano@Waterboards.ca.gov)**
– Manages the statewide GeoTracker and UST Cleanup Program; can connect stakeholders to local contacts.
- » **Steven Mullery (Steven.Mullery@waterboards.ca.gov)**
– GeoTracker Technical Lead; maintains data on stalled/slow-moving cases.
- » **Bridget Freeborn (Bridget.Freeborn@waterboards.ca.gov)**
– Oversees UST Cleanup and Orphan Site Cleanup Funds; provides funding guidance for non-responsible parties.
- » **Weixing Tong (Weixing.Tong@waterboards.ca.gov)**
– Senior Engineering Geologist at the Los Angeles Regional Water Board; point of contact for Region 4 site inquiries and coordination.

These staff members can provide the most current data and help facilitate conversations about cleanup and redevelopment opportunities. While just one of many strategies to advance the PNA+ Implementation goals, exploring LUST site remediation is a meaningful opportunity to promote environmental justice and park equity in Los Angeles County's highest-need areas.