



CITY OF PORTLAND ENVIRONMENTAL SERVICES



The Portland Building ■ 1120 SW Fifth Ave, Suite 613, Portland, Oregon 97204 ■ Dawn Uchiyama, Director

IV.D. Narrative Information Sheet

1. Applicant Identification

City of Portland
1120 SW 5th Ave Rm 1250
Portland, OR 97204

2. Website URL

www.brownfield.org

3. Funding Requested

- a. Single Site Cleanup
- b. Federal Funds Requested
\$500,000

4. Location

- a. City, Portland
- b. County, Multnomah
- c. State, Oregon

5. Property Information

West Property 10505 North Portland Road Portland, OR 97203
A map showing the property is attached.

6. Contacts

a. Project Director

Jenn Bildersee
503-823-7764
jenn.bildersee@portlandoregon.gov
1120 SW 5th Ave, Suite 613
Portland OR 97204

b. Chief Executive/Highest Ranking Elected Official

Mayor Ted Wheeler
503-823-1051

Ph: 503-823-7740 ■ Fax: 503-823-6995 ■ portland.gov/bes ■ An Equal Opportunity Employer

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mayorwheeler@portlandoregon.gov

1221 SW Fourth Avenue, Suite 340

Portland, OR 97204

7. Population

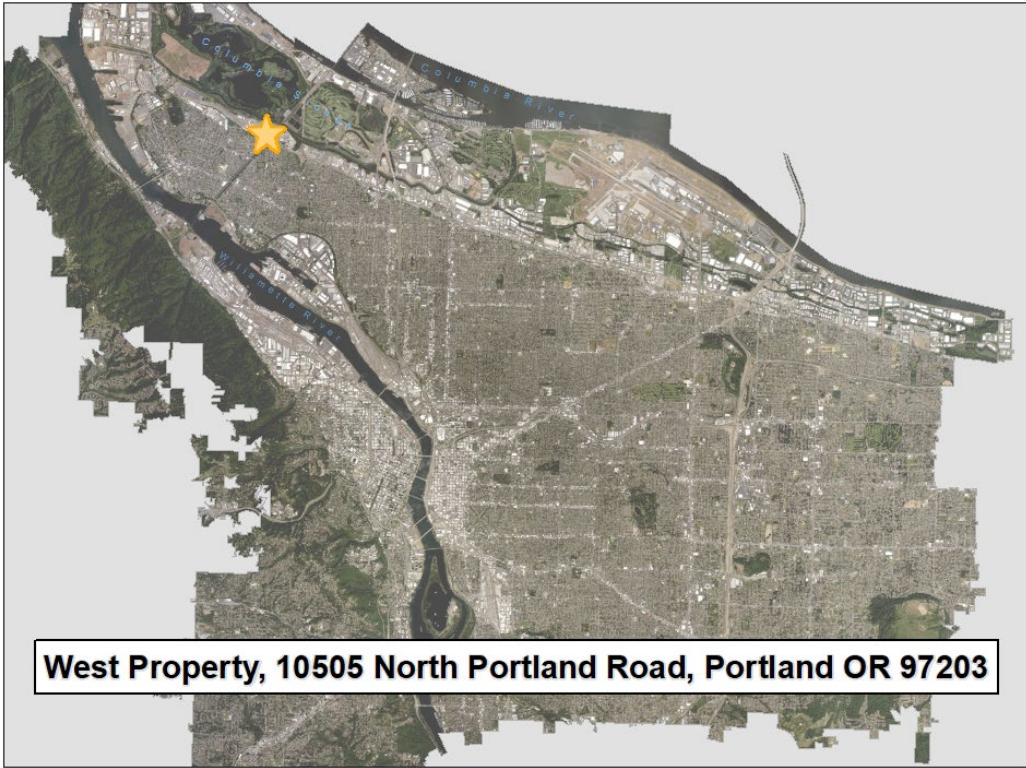
City, population 630,498

8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
The proposed site is adjacent to a body of water (i.e., the border of the proposed site 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).	YES see p. xx
The proposed site is in a federally designated flood plain.	YES see p. xx
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	N/A
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	YES see p. xx
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	N/A

9. Releasing Copies of Applications

N/A, Application does not have confidential, privileged, or sensitive information. It may be made available to the public by EPA.



West Property, 10505 North Portland Road, Portland OR 97203

IV.E. Narrative/Ranking Criteria 1. Project Area Description and Plans for Revitalization

a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of Target Area

Located near the confluence of the Willamette and Columbia rivers, Portland is on the northwestern border of the state of Oregon, in the beautiful Pacific Northwest. The Portland metro area rests on traditional village sites of the Multnomah, Wasco, Cowlitz, Kathlamet, Clackamas, Bands of Chinook, Tualatin Kalapuya, Molalla and many other tribes. As Oregon's largest city, current geography has been shaped by over 100 years of industry – interstate highways, air terminals, shipping facilities, and railroads – that has left behind a legacy of environmental contamination. Yet Portland is also a leader in local environmental policy, prioritizing thriving natural areas and waterways, including one of the country's largest urban wetlands, Smith and Bybee Lake, directly north of the subject property.

The West Property (the "Site") for which EPA Cleanup funding is being requested, is located in the St. Johns neighborhood, 7 miles north of downtown. With the Columbia River to the north and the Willamette River to the west, modern St. Johns was developed in the late 1800s and 1900s around river-dependent industries like mills, manufacturing, and the railroad. That character continues today: the northern portion of the neighborhood is a vast industrial landscape of cargo and shipping facilities and warehouses, including the 11 km² Rivergate Industrial District of the Port of Portland. St. Johns is also known for its proximity to natural habitats, including the Columbia Slough, which runs parallel to the Columbia River for 19 miles along Portland's north border and is adjacent to the Site.

This EPA grant will enable the City to remediate a 4.25 acre brownfield directly adjacent to Columbia Slough, preventing contaminated erodible solids from making their way to a delicate waterway that is home to four ESA listed species. Remediation will also clear the way for redevelopment of the site as both a staging area for public works, like floodplain restoration projects, and as a natural area providing critical habitat and public access for pedestrians and bicyclists.

ii. Description of the Proposed Brownfield Site The City of Portland is applying for a \$500,000 clean up grant for the West Property at 10505 Portland Road, purchased by the City in 2001. The site, now undeveloped with no structures and covered in gravel and grass, is bordered by Columbia Steel industrial site to the west, Columbia Boulevard Wastewater Treatment Plant to the east, Truck Repair Enterprise to the south, and the Columbia Slough to the north. The northern border is a 50' wide riparian zone of mature trees and ground cover, sloping from the upland area to the water line.

The West Property was occupied by a lumber mill until 1948. By 1961, it was a truck washing facility that discharged wastewater to on-site ponds which were later developed into retention ponds. Pond usage ceased in 1980 due to phenols, phthalates, and heavy metals detected in pond sediment and pond water samples. Concentrations of these constituents were below Resource Conservation and Recovery Act (RCRA) hazardous waste levels, and the Oregon Department of Environmental Quality (DEQ) allowed the pond sediment to be left in place and the pond backfilled with high-clay content fill. Truck washing operations continued at the subject site under various owners until 1997 when the owner filed for bankruptcy. Operations from a neighboring property resulted in a release of chlorinated solvents to a soil and groundwater plume that extended beneath a small portion of the West Property. A remedial action was performed on the chlorinated solvent plume that involved in-situ bioremediation injections to treat the plume. The remedial action was completed in 2011. The City purchased the West Property in July 2001.

Past testing has indicated phenols, phthalates, heavy metals, PCBs, pesticides, petroleum, VOCs, SVOCs, and cyanide contamination at the site. Contaminant levels in West Property topsoil have been found to exceed environmental levels, and all runoff from the site flows directly to the slough.

The Columbia Slough was once a vast system of side channels, lakes, and wetlands covering the floodplain of the Columbia River, but has been substantially altered over decades to accommodate industry and agriculture. Wetlands and side channels were filled and waterways were channelized, resulting in a significant loss of habitat, flood storage capacity, and reduced ability to filter sediments and pollutants. Watershed conditions are slowly improving as regulatory measures and best management practices reduce pollution and improve natural resources. Nine miles of the Slough by the Site are designated critical habitat to ESA-listed coho salmon, Chinook salmon, and steelhead.

In 2023, in response to the housing crisis declared by the Mayor and City Council, the City began steps to use a 6 acre portion of the site as a Temporary Alternative Shelter Site (TASS), a managed outdoor shelter with connection to resources and comprehensive social services for Portlanders experiencing houselessness. TASS locations provide onsite support to help individuals develop health and housing plans to transition to permanent housing. The site provides both tent/camp sites and RV spaces. To respond swiftly to the need for shelter, planning for the full West Property was divided: a 6-acre area that was minimally impacted by past contamination was fenced off from the rest of the site to become the TASS, and this portion was advanced through ODEQ processes to ensure safe shelter use. A Contaminated Media Management Plan, a Risk Assessment, and a Remedial Action Plan were completed for the TASS site, and it was capped with asphalt to prevent human contact with potentially contaminated soil. This grant will allow the City to move forward with the cleanup of the remaining portion of the West Property, which will prevent potential ecological impacts to the Columbia Slough. A Risk Assessment for the entire West Property is currently being finalized.

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

The West Property is currently managed by the City of Portland's Bureau of Environmental Services, which intends to redevelop the site to provide multiple civic, environmental, and recreational benefits. Redevelopment plans involve 3 components:

Riparian zone protection and enhancement, for the 50' northern border of the site along Columbia Slough. Protection and restoration efforts will enhance both upland and in-water habitat, restore water quality, and contribute to a thriving riparian corridor. Activities align with **City of Portland 2035 Comprehensive Plan** Policy 7.45 Riparian corridors. Increase the width, quality, and native plant diversity of vegetated riparian buffers along Columbia Slough channels and other drainageways within the watershed, while also managing the slough for flood control.

Trail installation. The trail will provide a connection for bikers and pedestrians with the 40 Mile Loop, a partially completed greenway trail around and through Portland and the surrounding area that has been identified by community advocacy groups and regional government as a key strategic priority. **Portland City Council Proclamation 485-2023** calls upon "all of our local government partners to recommit to the completion of the 40 Mile Loop," in alignment with **Metro's Regional Framework Plan** Policy 3.4.2, "Provide access to publicly owned parks, natural areas, open spaces, and greenways, where appropriate via the Regional Trails System," and 3.4.5, "Encourage local governments to integrate local and neighborhood trail systems with the Regional Trails System."

Public works staging area, on an upland portion of the site that will be paved with asphalt after remediation is complete, to prepare materials for civic projects. The City has several active civic projects that require large staging areas that are well connected to major arterials and can be accessed without driving large equipment through residential areas, to align with the City's **2035 Comprehensive Plan** Policy 9.46 Traffic Management "Evaluate and encourage traffic speed and volume to be consistent with street classifications and desired land uses to improve safety, preserve and enhance neighborhood livability." An appropriately accessible staging area will enable safe

storage of large woody debris salvaged from downed trees after storms, so that it can be prepared for reuse in floodplain restoration projects. The City’s riparian restoration also requires removing historic boulders originally placed during the Works Progress Administration; the Site will provide a location where these can be safely collected and restored for future interpretive and educational displays. Reuse of materials aligns with **City Code** 17.102.010, “It is the policy of the City of Portland to reduce the amount of solid waste, both generated and disposed of, by promoting aggressive waste prevention and recycling activities,” and with **Metro’s 2030 Regional Waste Plan** Goal 8: Increase the reuse, repair and donation of materials and consumer products 8.2 to “Implement strategies to increase the salvage of building materials for reuse, without increasing exposure to toxics.”

ii. Outcomes and Benefits of Reuse Strategy Cleanup work funded by this grant will facilitate the preservation and enhancement of riparian habitat and provide a staging area for public works projects including environmental restoration. Addition of the trail will provide public access and recreational opportunities in a community identified as disadvantaged in the CEJST.

Riparian zone enhancement will improve local climate mitigation capacity and resilience. According to the Oregon Watershed Enhancement Board’s 2023 *Observed and Projected Changes in Climate*, the Portland region is projected to experience an increase in the following over the next 75 years:

average temperature	winter precipitation	frequency of floods
extreme heat	atmospheric rivers	magnitude of floods

FEMA already places portions of the subject site, along the northern border with the Slough, in Zone AE special flood hazard area with base flood elevation of approximately 31 feet. An additional portion of the site is also located in Zone X with 0.2% annual chance flood hazard zone. EJ Screen lists the Site area as having an elevated flood risk in the 86th percentile nationally. The enhanced riparian buffer provided by this project will slow water flow, detain runoff, spread floodwaters, and stabilize the streambank, to help mitigate projected climate changes. This aligns with **Portland’s 2035 Comprehensive Plan** Goal 7.4.b, “Climate adaptation and resilience: Enhance the ability of rivers, streams, wetlands, floodplains, urban forest, habitats, and wildlife to limit and adapt to climate-exacerbated flooding, landslides, wildfire, and urban heat island effects.”

c. Strategy for Leveraging Resources

i, ii, iii. Resources Needed for Site Characterization, Remediation, and Reuse

Name of Resource	(1.c.i.), (1.c.ii.) or (1.c.iii.)	Status	Additional Details About the Resource
Open EPA Brownfield Community Wide Assessment Grant	1.c.i. Assessment	Secured	City of Portland has an open FY22 Brownfield Community wide Assessment Grant that will be used for any necessary further characterization
ODEQ State Response Program	1.c.i. Assessment	Will be sought if needed	ODEQ has recommended use of State Response Program funding if the scope of needed further characterization exceeds existing EPA brownfield assessment grant funds
Business Oregon Brownfield Cleanup Fund	1.c.ii. Remediation	Will be sought if needed	Oregon’s state economic development agency offers these two funds, financed by state lottery and bond money, awarded on a case-by-case basis as grants for remediation work on publicly owned projects with community benefit.
Business Oregon Brownfield Redevelopment Fund	1.c.ii. Remediation	Will be sought if needed	

Additional Remedial Measures (ARM) Fund	1.c.ii. Remediation 1.c.iii. Reuse	Secured	In 2024 the City and ODEQ finalized a settlement that includes a City allocation of \$4 million, known as the ARM Fund, for restoration and watershed enhancement projects on Columbia Slough. Riparian areas of the subject property are identified as a potential location for funding.
Columbia Slough Natural Resource Fund	1.c.iii. Reuse	May be sought after cleanup	ODEQ's Natural Resource Damage Fund for resource improvements in the Columbia Slough. Industrial facilities and other liable parties along the Slough have paid into this fund to mitigate for environmental damages. It is available to government entities for habitat restoration.
City of Portland Capital Improvement Project budget	1.c.iii. Reuse	Will be sought when cleanup is complete	Eventual redevelopment including stormwater infrastructure, trail construction, revegetation, and partial asphalt paving, will be funded by City budget. Funds can not be allocated until this phase of remediation is complete.

iv. Use of Existing Infrastructure Brownfield projects work in concert with Portland's robust land use, construction, and transportation policies, designed for reuse of city assets. The West Property is located in an established neighborhood along a major transportation corridor, currently accessed by an existing private road from the arterial, and fully served by water, power, and telecom. Because the site's geography and proximity to the slough make septic connection difficult, a full operating cistern system is already in place for sewage. A Trimet public bus stop is located on the same block as the Site. Additional stormwater treatment facilities will be part of redevelopment.

Redeveloping a site served by existing infrastructure alleviates expansion pressure into greenfields, and substitutes infill for outward sprawl that would require extensive resource consumption and increased air pollution from traffic. It aligns with **City of Portland 2035 Comprehensive Plan** Policy 3.6 Land efficiency. Provide strategic investments and incentives to leverage infill, redevelopment, and promote intensification of scarce urban land while protecting environmental quality.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community's Need for Funding Portland is requesting this grant because of the City's inability to draw on other sources of public funds without severely impacting essential and critical human services. In October 2024, Mayor Wheeler announced that all non-public safety City departments should prepare to make a 5 to 8% reduction in their baseline budgets in 2025. The majority of City revenues come from property taxes and business taxes, which were heavily impacted by the pandemic and have not recovered: property taxes grew at a historically low rate, and business taxes dropped 10% in the past year. Portland's increase in vacant office buildings, drop in population size, and stagnant employment rates have all contributed to the economic downturn. Portland's population is declining at a rate of -1.2% annually and has decreased by -4.7% since the most recent census in 2020. This is coupled with inflation and rising expenses, leading to a \$20 million general fund deficit. Additionally, nearly \$40 million last year came from one-time funding sources such as federal pandemic relief dollars, but the issues they addressed – like homelessness, gun violence, and trash removal – persist, requiring new City expenditures.

The Site's census tract, 41051004101, is identified as disadvantaged in CEJST, and is in the 90th percentile for unemployment. The area is identified as low income on EPA EJ Screen.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations The Site’s census tract is identified as a Justice40 disadvantaged community and an EPA IRA disadvantaged community.

Sensitive Populations	SITE PERCENTILE IN STATE
People of Color	92
Under Age 5	96

According to EJ Screen, the surrounding community has Lower Life Expectancy in the 97th percentile for Oregon.

Children in the area may be more impacted by the above 90th percentile exposure to diesel particulates and toxic releases to

air, and proximity to Superfund sites and RMP facilities sites, as detailed in 2.a. (2) and (3), as well as to the contaminants found on the Site including SVOCs, VOCs, pesticides, PCBs, metals. In addition to eliminating exposure to these contaminants, the EPA grant will help convert the Site from unused vacant land to a community asset. The re-use plan includes habitat restoration that will contribute to better air quality, and a trail connected to a regional network that will provide opportunities for healthy outdoor recreation. Health of sensitive populations living near the Site during cleanup activities will be protected by implementing best practices including dust control, appropriate truck routes, perimeter vapor monitoring, and fencing.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions According to EJ Screen, 25% of individuals in the Site’s area have Low Life Expectancy, putting it in the 97th percentile statewide. Asthma rates are above 10%, which is in the 88th percentile nationally.

Environmental Burden Indicators	Percentile in Oregon	Percentile in US
Diesel Particulate Matter (µg/m³)	95	95
Toxic Releases to Air (toxicity-weighted concentration)	97	88

In the Site’s current condition, erodible solids have the potential to reach the slough via overland sheet flow and by means of the municipal stormwater conveyance system. Grant-funded cleanup will remove this pathway, while advancing a reuse plan that provides enhanced natural area for air quality improvement, and trail connections for healthy outdoor recreation.

(3) Environmental Justice (a) Identification of Environmental Justice Issues CEJST identifies this census tract as disadvantaged. EJ Screen lists the Site area as above the 80th percentile for 8 Environmental Justice indices: particulate matter 2.5, diesel particulate matter, toxic releases to air, superfund proximity, traffic proximity, RMP facility proximity, hazardous waste proximity, and drinking water noncompliance. The site is also above the 90th percentile in unemployment and above 10% of people ages 25 or older whose education is less than a high school diploma.

Environmental Burden Indicators	Percentile in OR	Percentile in US
Superfund Proximity (site count/km distance)	98	88
RMP Facility Proximity (facility count/km distance)	98	98
Hazardous Waste Proximity (facility count/km distance)	93	91

(b) Advancing Environmental Justice The project will advance environmental justice by immediately removing exposure to known contaminants in a CEJST disadvantaged community that is above the 90th percentile for proximity to Superfund, RMP facilities, and hazardous waste. Reuse plans will provide enhanced vegetation in a neighborhood with high levels of air pollution. As the property is currently undeveloped, the reuse plan will not contribute to displacement of residents or businesses, and instead will provide new community amenities.

b. Community Engagement i. Project Involvement ii. Project Roles

Organization	Entity’s mission	Contact	Specific involvement in the project
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DEQ	To restore, maintain, and improve the quality of Oregon's air, land, and water.	Sarah Greenfield, Sarah. GREENFIELD@deq.oregon.gov	Provide technical advising and expertise as well as the regulatory oversight. State Response Fund for financial assistance on unanticipated assessment costs.
Columbia Slough Watershed Council	Nonprofit that brings community, business, and local agency partners together to protect and enhance the Slough and its watershed through community engagement, education, and restoration.	Heather King, Executive Director, heather.king@columbiaslough.org	Reviewing documents, providing feedback on cleanup and reuse plans, sharing information with community members, identifying restoration priorities.
St Johns NA	Neighborhood Association for the St. Johns neighborhood where the Site is located.	RJ DeMello, chairperson info@stjohnspdx.org	Point of contact for the surrounding neighbors, shares information with nearby residents, provides a forum for presenting updates to neighbors, provides feedback on Site plans.
Bird Alliance of Oregon	Portland chapter of the National Audubon Society, with a mission to inspire all people to love and protect birds, wildlife, and the natural environment upon which life depends.	Micah Meskel, mmeskel@birdallianceoregon.org	Shares information with the community and provides feedback to the City on natural resource and ecological issues and priorities for the project, in particular the riparian restoration components.
Friends of Smith & Bybee Lakes	Community advocacy group for Smith and Bybee Lakes, located in the Columbia Slough less than a mile from the Site.	Eric Stern, Chair, ericsternmusic@gmail.com	Shares information and provides feedback to the City on natural resource and ecological issues and priorities for the project.
Willamette Riverkeeper	Community advocacy for the Willamette River and local water resource and ecological issues in the Portland Area.	Bob Sallinger, Executive Director Bob@willametteriverkeeper.org	Reviews documents, provides feedback to the City on natural resource and ecological issues and priorities for the project.
Cathedral Park NA	Neighborhood Association for the nearby Cathedral Park neighborhood.	Faith Ruffing, chairperson, cathedralparkpdx@gmail.com	Shares information with nearby residents, provides a forum for presenting updates to neighbors, provides feedback on Site plans.
Columbia Corridor Association	Business association committed to promoting and enhancing the viability of the Columbia Corridor, benefiting members and the local community.	Corky Collier, Executive Director, corky@columbiacorridor.org	Shares information and provides feedback specifically from the business community near the Site.
40 Mile Loop Land Trust	Nonprofit private land acquisition organization managed by a volunteer citizen board dedicated to helping complete the 40 Mile Loop regional trail.	Laura (Lou) Reynoldson, Board President, info@40mileloop.org	Shares information with community members interested in planned reuse of the Site for a new portion of the 40 Mile Loop, provides input during redevelopment public involvement process.
Metro Smith and Bybee Advisory Committee	Advisory body that provides diverse stakeholder perspectives to advise local government on caring for the Smith and Bybee Wetlands Natural Area.	Jonathan Soll, Metro, jonathan.soll@oregonmetro.gov	Shares information with the community members, provides feedback to the City on plans and priorities. Serves as a point of connection between City and the regional government Metro.

Joint Office for Homelessness Services	Coordinates local, state and federal funding to address the homelessness crisis in Portland and Multnomah County and oversees the delivery of participant-driven, equity-based services to people who are experiencing homelessness or at risk of becoming homeless.	Brandy Westerman, Director of Humanitarian Operations Brandy.Westerman@portland.oregon.gov	Provides coordination, insight, and advising on matters related to the adjacent Temporary Alternative Shelter Site (TASS), the Shelter’s residents, and houselessness issues. Shares information important to houseless neighbors of the Site.
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iii. Incorporating Community Input If this application is selected for funding, the draft ABCA will be made available for additional public review and comment. This will include direct notification of all organizations in the table above, with an offer for City staff to present ABCA and project plans at their regularly scheduled in person or online meetings. Community input will be collected and summarized, and incorporated into the ABCA revisions before it is finalized.

For the redevelopment phase of the project, the Bureau of Environmental Services dedicated Public Involvement team will implement a comprehensive community engagement plan that includes:

- Development of a project webpage and regular updates.
- Project updates mailed to nearby residents, businesses, and community organizations.
- Creation of a project email list and monthly update emails about the planning and design process.
- Social media posts on Nextdoor.com.
- Presentations to neighborhood business and community associations, virtual and in person.
- “Open House” event to communicate project plans and gather feedback, virtual and in person.

Online and printed BES project information is available in multiple languages. Fliers communicating what to expect during construction are translated into 11 languages. Outreach will include work to identify underserved or low English proficiency communities impacted by the project, and to develop specific engagement strategies to reach them. Community events will include trained Community Engagement Liaisons who will assist Public Involvement staff in cultural and language translation and interpretation. Public Involvement staff will serve as the point of contact for interested community members and will respond to all inquiries in a timely manner. They will ensure that community concerns are brought to the project team for consideration and response. Community input will be collected and summarized into a report that will be included in the planning and design process.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

This section is currently being revised. The total cleanup grant amount will be \$500,000.

- a. Proposed Cleanup Plan
- b. Description of Tasks/Activities and Outputs
 - i. Project Implementation
 - ii. Anticipated Project Schedule
 - iii. Task/Activity Lead
 - iv. Outputs
- c. Cost Estimates

Budget Categories		Project Tasks (\$)				
		(Task 1)	(Task 2)	(Task 3)	(Task 4)	Total
Direct Costs	Personnel					
	Fringe Benefits					

	Travel					
	Equipment					
	Supplies					
	Contractual					
	Construction					
Total Direct Costs						
Indirect Costs	0	0	0	0	0	0
Total (Direct + Indirect)						

d. Plan to Measure and Evaluate Environmental Progress and Results A main goal of this grant is to ensure that the cleanup of the site meets ODEQ expectations to be fully protective of human and environmental health. To accomplish, the City will implement the ODEQ approved cleanup alternative outlined in the Site ABCA, under ODEQ oversight of the Voluntary Cleanup Program. All sampling will be conducted in accordance with ODEQ and EPA protocols. The results of the sampling and remediation will be made available to ODEQ and EPA. Cleanup progress will be reported on EPA’s Assessment, Cleanup and Redevelopment Exchange System (ACRES) site in a timely manner. The subsequent re-use of the sites following remediation will also be reported on ACRES. Outputs including finalized reports, key meetings / events, and outreach materials in our quarterly report, along with project narratives. The quarterly report reflects accomplishments against workplan goals, and charts budget and overall progress in the context of the full grant timeline.

Internally, the Bureau of Environmental Services employs project management software and principles to ensure project progress is on schedule, on budget, and properly reported. At appropriate milestones the City will coordinate with the EPA Project Officer to ensure deliverables are as expected, and will confer with them and our TAB provider if unexpected problems arise. Our primary metrics of success for environmental progress and results under this grant are:

- Full compliance with EPA grant terms and conditions, schedule, and budget
- Implementing the proposed cleanup, and receiving approval and concurrence from ODEQ that unacceptable risk to human and ecological receptors has been addressed on the Site.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Structure ii. Description of Key Staff The Portland Brownfield Program has been providing technical and financial assistance for environmental issues since 1998. The Program is permanently funded with 1.5 FTE and housed in the city’s Bureau of Environmental Services, a bureau of over 650 employees that includes staff dedicated to technical services, financial management, and business operations.

Our long-tested program and city organizational structure ensures timely and successful expenditure of funds. Program staff coordinate administrative steps with EPA, including approval at necessary milestones. Site access is secured using a process developed with our City Attorney’s Office. Program staff is responsible for all administrative requirements through the life of the project, including communication with EPA Project Officer, ACRES reporting, and quarterly reporting. Program staff will also manage project and grant budgets, drawing on expertise from Contracts and Financial Planning divisions of our Business Services group as needed. We coordinate with Portland’s Office of Management and Finance Grants Management team to ensure all grant terms and conditions are met, and that EPA reimbursements are requested in a timely manner.

Though we can draw on an extensive network of experts as necessary, grant work will be primarily performed by several key staff. Overall grant management and daily operations will be performed by Portland Brownfield Program Coordinator Jenn Bildersee. Jenn holds a B.A. in biology from Columbia University and a Master of Landscape Architecture from University of Oregon. She has worked with the Portland Brownfield Program for 17 years, managed 9 cooperative agreements with EPA, and served as project manager on dozens of assessments and cleanups. Jenn will coordinate all activities related to grant implementation including outputs, outcomes, and reporting. Program assistant Candice Loveland has a B.S. in Environmental Science from Portland State University and has been with the Brownfield Program for 5 years. She provided extensive support and coordination for our 2016 and 2022 EPA assessment grants, including community involvement, stakeholder coordination and communication, contractor oversight, quarterly reporting, and outreach material development.

The Brownfield Program is situated in the Bureau of Environmental Services, which itself has its own in-house Coordinated Site Analysis team that regularly performs environmental assessment work for City-owned properties. The CSA team includes a registered professional engineer, registered geologist, senior engineering associate, environmental specialist, environmental technician-II, and two seasonal field technicians, with a combined 80 years of experience with the investigation and cleanup of contaminated sites. Craig Haynes, Grants Analyst with the City of Portland's Office of Management & Finance, will act as payee drawing down funds in ASAP,; prepare and submit FFRs,; and help ensure compliance with 2 CFR and other grantor requirements. Craig has 16 years of experience administering grants at various levels. He holds a BSc in accounting and an MBA in finance. Environmental Services Accounting Division Manager John Maloney and Accountant Joanne Udasco ensure compliance with GAAP Accounting principles and federal A-133 audit requirements. In case of changes, we will recruit qualified replacements to fulfill commitments.

iii. Acquiring Additional Resources City of Portland has multiple systems in place to appropriately acquire any additional expertise and resources required to successfully complete the project.

Contractor procurement will be competitive and include a cost analysis component. It will follow all required competitive Procurement Standards in 2 CFR 200.317- 326.

To promote diversity, inclusion, and local workforce and business opportunities in contracts, the City:

- developed the Prime Contractor Development Program
- participates in the Regional Workforce Equity Agreement, the Construction Diversity Inclusion Policy, and the Workforce Training and Hire Program,
- encourages proposing firms to use the State's Certification Office for Business Inclusion and Diversity (COBID) website for identifying potential D/M/W/ESB subcontractors, and
- staffs an Inclusive Contracting Services unit to engage historically underutilized and underrepresented businesses and their support networks on contract opportunities.

b. Past Performance and Accomplishments i. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments

4B- 02J18401, EPA Brownfield Assessment Grant awarded 2022. Outputs include 6 Phase I ESAs and 1 Phase I update, 1 Hazardous Materials Survey, 2 Quality Assurance Project Plans, 6 Phase II ESAs, 4 Contaminated Media Management Plans, 2 Remedial Action Plans, and 1 Risk Evaluation. As of October 1st, 1 Hazardous Materials Survey, 1 Quality Assurance Project Plan, and 1 Phase II ESA are still in progress. Funding also supported ODEQ Oversight for 4 projects. Outcomes included 28.89 acres of assessed land, petroleum and hazardous substances remediated, 2 shelter and transitional housing projects created or preserved serving 410 residents, and 296 units affordable housing created or preserved. Outputs and outcomes are accurately reflected in ACRES as of this submission.

BF-01J23801, EPA Brownfield Assessment Grant awarded 2016. Outputs included 11 Phase I ESAs and 2 Phase I updates, 7 Quality Assurance Project Plans, 6 Phase II ESAs, one Phase II ESA addendum, and 2 Contaminated Media Management Plans. Funding also supported ODEQ Oversight for 2 No Further Action letters. Outcomes included 11.3 acres of assessed land, petroleum and hazardous substances remediated, and 5 affordable housing projects creating 348 new units. Outputs and outcomes were accurately reflected in ACRES.

BF-00J45301, EPA Brownfield Assessment Grant awarded 2011. Outputs included 12 Phase I and 17 Phase II or limited Phase II environmental site assessments, 14 Quality Assurance Project Plans, and 1 cleanup plan. Outcomes included more than 50 acres assessed, with more than 25 of those acres contributed to parks, gardens, or open space, and more than 150 units of affordable housing. Outputs and outcomes are accurately reflected in ACRES.

(2) Compliance with Grant Requirements

4B- 02J18401, EPA Brownfield Assessment Grant awarded 2022. Portland was fully compliant with the workplan, schedule, and terms and conditions. We successfully met performance deliverables, and updated our ACRES files in a timely and complete manner. All funds are on track to be fully dispersed for grant activities within the next 6 months. Through the life of the grant, we made steady progress towards achieving the expected results as described in our Cooperative Agreement. Our record of timely and acceptable quarterly reporting was 100%. Over 70% of this existing grant has been drawn down, and the remaining amount has already been fully allocated to incoming projects.

BF-01J23801, EPA Brownfield Assessment Grant awarded 2016. City of Portland was fully compliant with the workplan, schedule, and terms and conditions. We successfully met quarterly performance deliverables, and fully updated our ACRES files in a timely and complete manner. One amendment to the grant schedule extended the term 18 months in response Covid-related project delays and the longer timeline of affordable housing projects. The amendment was clearly communicated with our Project Manager and properly documented. Our record of timely and acceptable quarterly reporting was 100%. Despite the catastrophic effects of the pandemic during the life of this grant – including all program staff and project partners abruptly transitioning to remote work, resource redirection to emergency operations, and new barriers to site work -- we achieved the goals as described in our Cooperative Agreement. All funds were dispersed for grant activities, and no funds remained at closing. In this grant, 89.8% of grant funds were spent on direct assessment tasks and activities. The remaining 10% was spent primarily on funding nonprofit environmental justice partners to lead community engagement activities, with small amounts spent on travel and materials.

BF-00J45301, Brownfield Assessment Grant awarded 2011, closed 2015. Portland was fully compliant with the workplan, schedule, and terms and conditions; we successfully met quarterly performance deliverables, and updated our ACRES files in a timely and complete manner. One amendment, clearly communicated with our Project Manager and properly documented, extended the term three months to provide time for final invoice processing. Timely and acceptable quarterly reporting was 100%. All funds were fully dispersed for activities as described in our Cooperative Agreement, and no funds remained at the time closing.

Attachement: III.B. Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

- a. City of Portland is a General Purpose Unit of Local Government, eligible for funding
- b. City of Portland is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The applicant does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The applicant is the current and sole owner of the site as of November 14, 2024.

The applicant will retain ownership of the site for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of the site.

5. Basic Site Information

- a) West Property
- b) 10505 North Portland Road Portland, OR 97203

6. Status and History of Contamination at the Site

- a) Hazardous substances are the predominant contaminant on the site. Multiple contaminants of concern are present at low levels, including SVOCs, VOCs, pesticides, PCBs, metals, and petroleum. Only one specific petroleum release is known, and it has already been cleaned up to ODEQ standards.
- b) The West Property was occupied by a lumber mill until 1948. By 1961, it was a truck washing facility that discharged wastewater to on-site ponds which were later developed into retention ponds. Pond usage ceased in 1980. Truck washing operations continued at the subject site under various owners until 1997 when the owner filed for bankruptcy. The City purchased the West Property in July 2001. The site is currently unused, undeveloped, with no structures and covered in gravel and grass.
- c) The environmental concerns at the Site include both hazardous substances and petroleum, with hazardous substances being the predominant risk drivers. The brownfield is located

directly adjacent to the Columbia Slough, and erodible solids have the potential to reach the slough via overland sheet flow and by means of the municipal stormwater conveyance system.

d) The site became contaminated over many decades of varied industrial use including as a lumber mill, trucking operation, and truck washing facility. Past testing has indicated phenols, phthalates, heavy metals, PCBs, pesticides, petroleum, VOCs, SVOCs, and cyanide contamination at the site. Contaminant levels in West Property topsoil have been found to exceed environmental levels, and all runoff from the site flows directly to the slough.

In 1980, phenols, phthalates, and heavy metals were detected in pond sediment and pond water samples. Concentrations of these constituents were below Resource Conservation and Recovery Act (RCRA) hazardous waste levels, and the Oregon Department of Environmental Quality (DEQ) allowed the pond sediment to be left in place and the pond backfilled with high-clay content fill.

7. Brownfield Site Definition

- a) The site is not listed or proposed for listing on the National Priorities List.
- b) The 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) The site is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

A written ASTM E1903-19 Phase II environmental site assessment report has been completed prior to application submission, in 1999.

- UST Decommissioning by Enviro-Comp Services, Inc. (ECS) in July 1997 (AMEC, 2000);
- Phase II ESA conducted by PNG in December 1998 (PNG, 1999a);
- Phase II Investigation conducted by PNG in May 1999 (PNG, 1999b);
- Phase II ESA conducted by Kleinfelder in May 2000 (Kleinfelder, 2000);
- Geotechnical Investigation by Fujitani Hilts & Associates, Inc. (Fujitani) in May 2000 (Fujitani, 2000);
- Monitoring well installation conducted by AMEC in September 2009 (AMEC, 2009);
- South Larsen Groundwater Remediation conducted by Ash Creek Associates, Inc. (Ash Creek) in January 2011 (Ash Creek, 2011a);
- Groundwater monitoring event conducted by GeoEngineers in July 2011 (GeoEngineers, 2011);
- Columbia Steel soil stockpile removal confirmation sampling conducted by the BES in May and September 2020;
- Columbia Steel soil stockpile removal soil evaluation conducted by the SLR International Corporation (SLR) in June 2020 (SLR, 2024);

- Test Pit Investigation conducted by BES in October 2023; Soil Boring Investigation conducted by BES in November 2023; and
- Soil Vapor Investigation conducted by Haley & Aldrich in April 2024 (Haley & Aldrich, 2024b)
- Risk Assessment for the West Property TASS 2 Site conducted by Haley & Aldrich in August 2024 (Haley & Aldrich, 2024c)

9. Site Characterization

a. N/A

b. A current letter from the appropriate State Environmental Authority, the Oregon Department of Environmental Quality, is attached. The letter is for the FY25 Cleanup Grant application and not a previously submitted application. The letter:

- i. Affirms that the site is eligible to be enrolled in the state voluntary response program.
- ii. Indicates that the site is enrolled in the state voluntary response program.
- iii. Indicates additional assessment may be needed to sufficiently characterize the site for the remediation work to begin; and affirms that there will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2025, for the remediation work to begin on the site.

c. N/A

10. Enforcement or Other Actions

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

11. Sites Requiring a Property-Specific Determination

The site does not need a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Hazardous substances are the predominant contaminant on the site. The applicant qualifies for funding because the property is publicly owned, was acquired prior to January 11, 2002, and the applicant has not caused or contributed to a release or threatened release of hazardous substances at the property.

13. Cleanup Authority and Oversight Structure

Please note that you will be required to comply with all applicable federal and state laws and ensure that each cleanup project protects human health and the environment.

a. The site is already enrolled in the state response program and will remain under ODEQ oversight through the duration of work funded by this grant.

b. Access to neighboring properties will not be necessary to conduct the cleanup, perform confirmation sampling, or monitor offsite migration of contamination.

14. Community Notification

d. Submission of Community Notification Documents

A draft ABCA is attached.

A dated image of the messages used to notify the public at least 14 calendar days before the application was submitted to EPA is attached. **will be attached when available**

The applicant's response to public comments is attached. **will be attached when available**

A summary from the public meeting is attached. **will be attached when available**

Meeting participant list is attached. **will be attached when available**

15. Contractors and Named Subrecipients

N/A, a contractor has not already been procured.