City of Portland EPA Site Assessment Application FY 2022: Narrative Information Sheet

1. Applicant Identification:
City of Portland
1221 SW 4th Avenue
Portland OR 97204

2. Funding Requested
a. Community Wide Assessment Grant
b. Federal Funds Requested: $500,000

3. Location we propose to serve
   a) city, Portland
   b) county, Multnomah
   c) state, Oregon

4. Target Area and Priority Site/Property Information
   We have two targeted geographic areas for this grant:
   (1) Projects in and around East Portland that will serve the new and rapidly growing population, particularly those displaced from closer-in areas, and
   (2) Projects in N/NE Portland’s historic African American neighborhoods that will alleviate and reverse displacement pressure by supporting affordable housing.
   Census tracts for these areas are,
   For East Portland and adjacent neighborhoods:
   41051007700, 41051007800, 41051007900, 41051008002, 41051008001, 41051007300, 41051010200, 41051009400, 41051009301, 41051009302, 41051008100, 41051008202, 41051001702, 41051001602, 41051008201, 41051009201, 41051009202, 41051009701, 41051009702, 41051009804, 41051009101, 41051009000, 41051009102, 41051008901, 4105022208, 41051008902, 4105022206, 41051000602, 4105100601, 41051008500, 41051009102, 41051008400, 41051008302, 41051009000, 41051009101, 41051009804, 41051008301, 41051001702, 41051002903, 41051007300, 41051007400, 41051007600, 41051002901, 41051007500, 41051002901, 41051002902, 41051007700, 41051007800
   For N/NE areas of displacement (Humboldt, Boise, Eliot, King, Sabin, Vernon, Alameda, Concordia, Woodlawn):
   41051003702, 41051003803, 41051003401, 41051003501, 41051003502, 41051003502, 41051003402, 41051002203, 41051002203, 41051002303, 41051003301, 41051003302, 41051003601, 41051003200, 41051003301, 41051003302, 41051002401, 41051002501, 41051003601, 41051003200, 41051003301, 41051003601, 41051003100, 41051003200, 41051002501, 41051003100, 41051003200, 41051003602, 41051003603, 41051003000, 41051003602, 41051003601
Address of Priority Site proposed in narrative: 11257 NE Sandy Boulevard, Portland, OR 97220

5. Contacts

a. Project Director
Jenn Bildersee  
(503) 823-7764  
Jenn.Bildersee@portlandoregon.gov  
1120 SW 5th Ave, Suite 613  
Portland OR 97204

b. Highest Ranking Elected Official
Mayor Ted Wheeler  
(503) 823-1051  
Ted.Wheeler@portlandoregon.gov  
1221 SW 4th Ave, Room 340  
Portland OR 97204

6. Population: 652,500

7. Other Factors: Applicants claiming one or more of the other factors below must provide a summary in the Narrative on the applicable other factor(s). Please identify which of the below items apply to your community/proposed project by noting the corresponding Narrative page number.

<table>
<thead>
<tr>
<th>Factor</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>N/A</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>N/A</td>
</tr>
<tr>
<td>The priority site(s) is impacted by mine- scarred land.</td>
<td>N/A</td>
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<tr>
<td>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).</td>
<td>1, 4</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>N/A</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>N/A</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will incorporate energy efficiency measures.</td>
<td>2</td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.</td>
<td>N/A</td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
<td>N/A</td>
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November 19, 2021

United States Environmental Protection Agency
Office of Brownfields and Land Revitalization (MC 5105-T)
1200 Pennsylvania Avenue, NW
Washington DC 20460

Re: DEQ Support for the City of Portland’s Application for a Community-Wide Brownfield Assessment Grant

Dear EPA Brownfield Grant Manager:

The Oregon Department of Environmental Quality supports the City of Portland’s application for a community-wide assessment grant. DEQ and the City of Portland have an established partnership that provides community-led and agency-supported brownfield assistance to a variety of communities in Oregon’s largest city. The successful redevelopment of a landfill into the 23-acre Cully Park, and the construction of a 61-unit affordable housing development following the cleanup of a former battery manufacturer (Wagstaff Battery Mfg.) are examples of DEQ’s and the City’s collaboration and commitment to addressing brownfields in Portland.

If awarded, grant funds will support the assessment of brownfields in North/Northeast and East Portland. Both of these communities have suffered the consequences of institutional discriminatory policies and practices, including redlining, and are disproportionately affected by legacy contamination associated with brownfields. With a focus on environmental justice, the City of Portland plans to use funding to assess properties where contamination may pose risk, and to position properties for future development in order to provide affordable housing and community resources.

DEQ is pleased to support the City of Portland’s EPA brownfield grant application. Please feel free to contact Rebecca Wells-Albers, DEQ Brownfield Coordinator at 503-229-5585 with any questions.

Sincerely,

Nina DeConcini
Administrator, DEQ Northwest Region

ecc: Paul Seidel, NWR/DEQ
     Kevin Parrett, NWR/DEQ
     Rebecca Wells-Albers, NWR/DEQ
     Terri Griffith, USEPA
City of Portland EPA Site Assessment Application FY 2022: Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields: i. Background and Description of Target Area

Located near the confluence of the Willamette and Columbia rivers, Portland is the largest city in Oregon. Portland’s interstate highways, air terminals, shipping facilities, and railroads have all contributed to our economy – and to our concentration of brownfields. Commercial corridors with former gas stations, dry cleaners, and other uses resulting in contamination are common, but concentrated in certain areas partly based on Portland’s history of racial segregation and redlining, gentrification, and displacement. Discriminatory practices and policies forced Black Portlanders into a cluster of neighborhoods in North/Northeast Portland: Albina, Humboldt, Boise, Eliot, King, Sabin, Vernon, Alameda, Concordia, and Woodlawn. Lending practices and systemic disinvestment meant that by the 1980s, median value for a home here was 58% below the city’s average. By 1990, 85% of Black Portlanders lived in this area. Planning practices concentrated environmental hazards in this area, and disinvestment and low property values stymied environmental cleanup. Since 2000, a rapidly growing city population and intense gentrification pressures led to thousands being displaced from these neighborhoods, many to East Portland nearly 10 miles east of downtown. East Portland and adjacent neighborhoods Sumner, Roseway, and Cully urbanized after World War II with car travel in mind. Split from the rest of the city by I-205, the area lacks walkability, amenities, dense development, and open space; its current character is marked by struggling commercial corridors with brownfields. We have two geographic target areas for this grant: (1) East Portland sites that will serve the rapidly growing population, and (2) historic Black neighborhoods for projects that will alleviate and reverse displacement pressure by supporting affordable housing, referred to here as N/NE.

a.ii Description of Priority Brownfield Sites

The most recent study conducted by the City of Portland identified an estimated 910 acres of potential brownfields in the city. East Portland has 118 sites totaling 306 acres with an existing DEQ record. Given East Portland’s car-centered development, it has multiple low-density commercial corridors with vacant and underutilized sites, with former use as gas stations, automotive service, dry cleaners, and small manufacturing. A concentration of brownfield sites is found along major arterial streets, including 82nd Ave, 122nd Ave, Foster Rd, Powel Blvd, and Columbia Blvd. As infill development increases, smaller brownfields are often directly adjacent to apartments, schools, and businesses. These are our priority sites. According to DEQ, contaminants found in East Portland’s brownfields are among those listed on the 2007 CERCLA Top 20 Priority List of Hazardous Substances: PCBs, PAHs, trichloroethylene and heavy metals, and asbestos, found in soil, water, and soil vapor. A Toxics Release Inventory for Multnomah County documents major pollutant releases of xylene, toluene, benzene, chromium compounds, and tetrachloroethylene. Pollutants are transported through sensitive watersheds that drain to the Willamette and Columbia Rivers, home to migrating salmon listed in the Federal Endangered Species Act. The Johnson Creek Watershed Council states, “Water quality in Johnson Creek is closely related to storm events. Rainstorms mobilize heavy metals, oils, and dirt.”

In N/NE, rapidly rising property values have reduced the number of brownfields. Studies conducted by the Portland Bureau of Planning and Sustainability in partnership with Portland State University label these areas as “late stage” gentrification. Remaining sites often have complicated and costly environmental barriers – which is exactly why they are still undeveloped. As the remaining vacant land, brownfields are opportunities for affordable housing, as long as they can be appropriately remediated to protect human health and vulnerable populations.

A priority site is the Cromb property, 11257 NE Sandy Blvd, Portland, OR 97220. Located on the commercial corridor of Sandy Blvd in our target area of East Portland, it is a prime location for affordable housing within walking distance of public transit. It was brought to our attention by community partner Historic Parkrose Neighborhood Prosperity Initiative. Currently a junkyard with 1 structure, it was historically a battery shop and automotive repair, leaving concerns about petroleum and heavy metals. The owner is a longtime resident who did not cause the contamination and is interested in reuse that benefits the surrounding community, but he lacks financial resources. This grant would allow us to provide environmental assessment to
clarify conditions and develop a cleanup plan if necessary, clearing the way for partnership with a nonprofit housing developer able to leverage multiple resources for site redevelopment.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Portland’s top priority is housing and homelessness. According to Freddie Mac research, Oregon has the largest housing shortage in the nation. Labor shortages, high construction costs, and rising cost of living are exacerbating the problem. In alignment with this priority, our focus will be brownfields that can address the housing crisis: sites where addressing environmental barriers will facilitate redevelopment for affordable housing, temporary and emergency shelter, and for organizations addressing the crisis. Targeting sites that require assessment for reuse as affordable housing aligns with Portland’s 2035 Comprehensive Plan, which identifies brownfield investment as a key strategy in building Portland’s economic prosperity, strengthening environmental justice, and improving environmental health:

- Policy 5.18: Coordinate plans and investments with programs that enable communities impacted by involuntary displacement to maintain social and cultural connections and re-establish a stable presence and participation in the impacted neighborhoods.
- Policy 6.14 Brownfield redevelopment. Overcome financial-feasibility gaps to cleanup and redevelop 60 percent of brownfield acreage by 2035.

Our proposal also aligns with the City’s Homelessness and Urban Camping Impact Reduction Program Strategic Plan Goal #3: Identify “underutilized City properties, or properties in pre-development stages, that could be used for alternative shelter purposes to provide lawful and organized places for people experiencing homelessness to sleep.”

Proposed work will advance other existing land use and revitalization plans including:

- Anti-Displacement Action Plan, to promote equitable development and reduce the harmful impacts of involuntary displacement on residents, businesses, and cultural organizations.
- North/Northeast Preference Policy, giving priority placement for City-sponsored housing opportunities in N/NE Portland to housing applicants who were displaced, are at risk of displacement, or descendants of households that were displaced due to urban renewal.
- Climate Action Plan, which includes, “Increase public investment and establish approaches to overcome financial gaps of brownfield redevelopment.... Use health and equity criteria to inform site prioritization. Support community-led brownfield redevelopment proposals.”
- Buildable Lands Inventory, an assessment of land capacity to accommodate forecasted housing and employment needs through the year 2035.

ii. Outcomes and Benefits of Reuse Strategy

Economic development will result from job creation and increased tax base from environmental cleanup and redevelopment. Assessment will also facilitate the creation of property used for nonprofit purposes in the target areas, with our focus on sites that address the housing crisis. We anticipate a majority of funded sites will be for affordable housing / related uses. In a conservative estimate, if 5 of the sites we propose funding for assessment under this grant redevelop as affordable housing, over 300 new affordable units would be created based on past project averages. On some sites assessment will allow us to address environmental issues while promoting the sustainable reuse of existing structures. In all cases, new structures will adhere to Portland’s rigorous efficiency code and policies, resulting in redeveloped sites that are significantly more energy and resource efficient than previous uses. In 2017, Portland adopted the Affordable Housing Green Building Policy, applying ambitious energy, water, and indoor air quality standards to construction and rehabilitation projects of affordable multifamily residential and mixed-use buildings that receive funding from or are owned by Portland Housing Bureau.

This project will address Justice40 by identifying, assessing and readying for cleanup sites that can be used to reverse displacement and provide jobs and services to those historically hurt by poor government planning and policy. Black communities were the most impacted by N/NE displacement: by 2010 41% of inner N/NE’s African Americans had already been displaced eastward, and that pattern has increased in the ensuing decade.
c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

Portland Brownfield Program is eligible for brownfield-related funding from our regional government Metro, state economic development agency Business Oregon, and EPA cleanup grants. We are also eligible for and currently exploring options for securing ARPA Relief Funds. Assessment dollars like this grant are an essential first step that stimulates project initiation. We will seek a variety of funds to support full site remediation and reuse: City funds, lending institutions, private investment, and public partners at the local, regional, state, and federal level. We will require private property owners / purchasers to pay 20% of the costs of Phase II Site Assessment, DEQ oversight, and Cleanup Planning if they have the means. For remediation and reuse of our priority site, we may seek funding from ODEQ grants; Business Oregon’s EPA Brownfields Revolving Loan Fund; other funds maintained by Business Oregon financed by state lottery and bond money including the Brownfield Cleanup Fund and Brownfield Redevelopment Fund; community foundations; private lenders; and federal funding including HUD. City of Portland pays Brownfield Program staff with ongoing general fund budget to provide assistance for all phases of a brownfield project, including those beyond the purview of this grant, to maximize project completion. An example of leveraged resources is BRIDGE Housing’s affordable apartment building, the Songbird, in N/NE. Provided with assessments through a previous EPA grant, funding was leveraged for cleanup and redevelopment from Portland’s EPA RLF grant, Oregon Housing and Community Services; Home Forward; Multnomah County; Barings Multifamily Capital; U.S. Bancorp Community Development Corporation; U.S. Bank National Association; Metro; Meyer Memorial Trust; and the U.S. Department of Housing and Urban Development.

ii. Use of Existing Infrastructure

Brownfield projects work in concert with Portland’s land use, construction, and transportation policies, designed for reuse of city assets. According to Wikipedia, Portland “is noted for its superior land-use planning and investment in light rail. Because of its public transportation networks and efficient land-use planning, Portland has been recognized as one of the most environmentally conscious cities in the world.” Sites in the established neighborhoods of our N/NE and East Portland target areas will rely fully on existing infrastructure; additional needs or upgrades are not anticipated. Our identified Priority Site is along a major transportation corridor, within 2 blocks of 2 bus lines, fully served by existing utilities. Redeveloping brownfields increases opportunity for business and housing to locate closer to neighborhood centers, transportation hubs, and employment. It alleviates pressure from expansion into greenfields, and substitutes urban infill for outward sprawl that would require extensive resource consumption and increased air pollution from traffic. Use of existing infrastructure results in savings to our local government. Based on national studies, it is estimated that infill development on brownfields in Portland has the potential to save $115 to $180 million in public infrastructure investment compared to typical greenfield development.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

The answer to this question is different for each of our target geographies. East Portland has the fastest growing neighborhoods in the city, but this growth is marked by a concentration of low-income households, and a large influx of families of immigrants and racial minority groups. Many citizens displaced from Portland’s gentrifying neighborhoods have been pushed to East Portland – where they encounter many brownfields, just as the neighborhoods they were displaced from are being cleaned up. Resource growth has not matched population growth. Community services are strained. With lower property values, private funding to address environmental issues in East Portland lags behind other areas of the city. Little funding is available for brownfield investment because budget is exhausted in provision of basic services. In N/NE, private funding sources are available primarily for market rate development, which with skyrocketing costs is unavailable to vulnerable communities. This grant provides critical
funds to allow us to tap into a dwindling supply of remaining parcels for affordable housing, giving a foothold for historically disinvested communities to stay in place or return.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

In East Portland the concentration of environmental challenges is collocated with sensitive populations, particularly minority residents experiencing cumulative impacts, and low income and linguistically isolated residents with limited ability to reduce their exposure or seek treatment. According to EJSCREEN: East Portland population is 42% People of Color, compared to 24% for Oregon overall; 43% are low income, compared to 33% for the state; and 9% are linguistically isolated, vs. 3% in Oregon. The planning bureau states, “East Portland is most at risk for displacement, with over 14,000 low-income cost-burdened renter households.”

Residents in our target area face myriad health and welfare issues besides displacement including air quality and lead hazards. The 2012 DEQ Portland Air Toxics Solutions report found that “low-income and minority communities are disproportionately impacted by higher concentrations of air toxics compared to mid to high income primarily white communities.” A 2014 Multnomah County Health Department Report Card found statistically significant disparity for African Americans in the county in exposure to diesel particulate matter. Several neighborhoods in the target area, such as Cully, border industrial zones and corridors. Local nonprofit Center for Intercultural Organizing writes that Columbia Corridor “abuts residential neighborhoods (in many cases, low-income housing stock including federal developments) …. Industry in the Corridor has exposed nearby residents to toxins, at least in part due to water contamination of the Columbia Slough.” The number of housing units in Multnomah County with a high risk of lead hazards is 12,000, placing it in the 90th percentile for counties nationally. A Portland Bureau of Planning report found that 72% of East Portland housing stock was built before 1979, when lead-based paints were widely used. A Multnomah County report states, “In a study of older homes in north, northeast and southeast Portland, 71% had composite lead dust levels that exceed federal standards.” This grant and reuse strategy addresses these health and welfare issues by: (1) directly reducing environmental contaminants through assessment that leads to cleanup, (2) supporting infill development that reduces vehicle travel and reduces air toxics; (3) facilitating redevelopment of aging buildings that contain contaminants; and (4) combating ongoing displacement, which exacerbates welfare issues for effected persons.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Contaminants found in East Portland are known to cause cancer and developmental delays; a 2014 Multnomah County Health Department Report Card found statistically significant disparity for African Americans in the county in all cancer mortality, obesity, access to prenatal care, coronary heart disease, infant mortality, and adults reporting overall fair or poor health. According to EJSCREEN the NATA Air Toxics Cancer Risk and NATA Respiratory Hazard Index for our target area of East Portland are both in the 70th-80th percentile nationally. Asthma rate data specific to the target area is not available, but from 2004-2007, 17.6% of African American adults in the county reported current asthma, compared to 8.2% of adults nationwide. The 2012 Portland Air Toxics Solutions environmental justice analysis found “the existence of disproportionate impacts from air toxics on minority and low-income populations in the Portland area.” According to the Portland Equity Atlas, “the census tracts with the highest rates of asthma (16.13%-25%) are scattered throughout the region, with the largest clusters concentrated in Multnomah County. The Multnomah County census tracts are located… in parts of outer East Portland.” Health conditions are exacerbated by the concentration of contaminants, the more vehicle-dependent landscape, and walkability deterrents like vacancy. Redeveloping brownfields in East Portland contributes to more dense, walkable communities, similar to those in other areas of Portland, that foster improved health outcomes, focusing on affordable housing to provide stability and a healthy environment for our most vulnerable communities.

(3) Promoting Environmental Justice

The key objective of proposed work is to support communities disproportionately impacted by environmental contaminants because of historic discriminatory policies and practices. A history
of redlining, disinvestment, highway siting, eminent domain, and zoning, created a landscape where Portland’s Black communities were concentrated in a small, specific area of N/NE that also carried disproportionate environmental impact from industry, commercial contaminants, and vehicle emissions. As soon as those environmental issues began to be addressed in the early 2000s, gentrification and further policy choices resulted in mass displacement. As N/NE neighborhoods became cleaner, the residents who had endured decades of environmental impact were often forced to relocate to East Portland – a neighborhood with unaddressed environmental issues. The work outlined in this grant promotes environmental justice in two ways: First, by putting East Portland brownfields on a path to cleanup, so that the rapidly growing communities there are not further exposed to contaminants and can benefit from the myriad advantages of brownfield redevelopment. Second, by transforming key sites in N/NE to affordable housing and related uses, to help remaining residents stay in place and allowing displaced residents to return to their communities. We aim to replicate projects like Wagstaff Battery on Williams Ave, in the historically African American Eliot neighborhood. After decades of use for metal fabrication, manufacturing, and “battery recycling,” this 1.25 acre property had petroleum and lead contamination. Our most recent EPA assessment grant updated a Phase I, completed a Phase II, and provided cleanup planning documents, allowing a nonprofit housing developer to safely purchase the site and leverage multiple funding sources to complete redevelopment. A 61-unit multi-family rental project called the Songbird opened in 2020. The new development provides 1-, 2-, and 3-bedroom units for families earning 50% to 60% of the Area Median Income. The Songbird employs the Portland Housing Bureau’s N/NE Preference Policy, giving preference to residents who have been harmed by Portland city action through urban renewal practices by prioritizing current and former residents of North and Northeast Portland for available affordable units.

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

Portland Brownfield Program works closely with community-based organizations to complete our work:

<table>
<thead>
<tr>
<th>Name of org</th>
<th>Point of contact</th>
<th>Specific involvement in the project or assistance provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Portland Action Plan (EPAP)</td>
<td>JR Lilly (503) 823-8027 <a href="mailto:r.lilly2@portlandoregon.gov">r.lilly2@portlandoregon.gov</a></td>
<td>EPAP is a community group formed around the creation of a neighborhood plan to improve quality of life, help foster strong community connections, increase the area’s regional significance, and improve equity for East Portland residents. EPAP will nominate for funding specific projects that it has identified as bringing benefit to East Portland, and will assist with community engagement for sites in our East Portland target area.</td>
</tr>
<tr>
<td>Joint Office of Homeless Services</td>
<td>Marc Jolin (503) 988-2525 <a href="mailto:marc.jolin@multco.us">marc.jolin@multco.us</a></td>
<td>The Joint Office actively seeks to redevelop sites for shelter and emergency housing. They will identify sites in need of assessment, prioritize projects, connect us with other housing organizations for community engagement, and provide partners with redevelopment support.</td>
</tr>
<tr>
<td>Housing Development Center (HDC NW)</td>
<td>Lara Spangler (503) 528-5190 <a href="mailto:lara@hdc-nw.org">lara@hdc-nw.org</a></td>
<td>HDC NW is a non-profit that provides technical services and support to local community development orgs building and maintaining affordable housing and related services. HDC NW will identify specific sites in need of assessment / cleanup planning where affordable housing redevelopment will combat displacement, connect us with other housing organizations for community engagement, and provide partners with redevelopment support.</td>
</tr>
<tr>
<td>Sabin Community Development Corporation (CDC)</td>
<td>Louie Brown (503) 539-4975 <a href="mailto:louie@sabincdc.us">louie@sabincdc.us</a></td>
<td>Sabin CDC is a local non-profit affordable housing provider that services N/NE Portland and centers the needs of historically marginalized communities. Sabin CDC is currently expanding their housing portfolio and will identify sites in need of assessments / cleanup planning.</td>
</tr>
<tr>
<td>Verde</td>
<td>Candace Avalos (503) 290-8570 <a href="mailto:candaceavalos@verdenw.org">candaceavalos@verdenw.org</a></td>
<td>Verde ensures that low-income people and people of color build and benefit from environmental investments. We have worked together on 4 brownfield projects: a community garden, a nonprofit office, an affordable housing site, and outreach strategy. Verde will assist with site identification, and community engagement through events and material development.</td>
</tr>
<tr>
<td>Portland Community Reinvestment Initiative (PCRI)</td>
<td>Maxine Fitzpatrick (503) 288-2923</td>
<td>PCRI invests in affordable housing in Portland’s neighborhoods, preserving diversity and providing tools to help low-income Portland families achieve stability. PCRI will identify affordable housing sites requiring assessment to combat displacement.</td>
</tr>
<tr>
<td>Rosewood Initiative Neighborhood Prosperity Initiative</td>
<td>Sabrina Wilson (503) 208-2562, <a href="mailto:sabrina@rosewoodinitiative.org">sabrina@rosewoodinitiative.org</a></td>
<td>The NPI program was started by the City of Portland to strengthen economic competitiveness in key underserved neighborhoods through community-planned and community-implemented actions. Rosewood Initiative will assist with site identification and prioritization, and community engagement for sites in need of assessment / cleanup planning.</td>
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iii. Incorporating Community Input

We will use a variety of strategies to foster communication with our communities, particularly those in our target areas. With all our outreach efforts, we aim not only to share information about projects and resources, but also to solicit feedback that is directly incorporated into Program plans. Feedback informs the evolution and execution of project activities from site selection through cleanup planning. We will create opportunities to engage a variety of stakeholders impacted by brownfields and to generate critical discussion about brownfield redevelopment activities and resources. We will receive comments and questions by email, telephone, website form, and at in-person and online meetings. All comments will be addressed on an individual basis, and staff will respond to each. With this assessment grant, we will share our draft plans and solicit feedback on an ongoing basis at diverse meetings and forums; for example, attending our partners’ events on a weekly basis to discuss brownfield work in their area. Relationship building is a priority for us: in 2020, program staff attended approximately 200 events, trainings, and community meetings. We will contribute to the email lists, newsletters, and websites of community and business organizations to post updates on current and planned work on a monthly basis; and distribute brochures and maps at community gatherings and events. Our own digital newsletter has a distribution list of over 300 subscribers and makes use of a media management application to better track our audience engagement and interest. If language translation or ADA accommodations are needed, alternative formats will be provided. Our multifaceted, grass-roots approach to communication enables us to reach those who may not be connected to more traditional outlets like neighborhood associations or large newspapers. At the time of this award, we will have had more than two years developing strategies for successful outreach that do not rely on in-person work, relating to COVID. Many community forums have also transitioned, and we will participate in partner, business, and neighborhood meetings online. In some ways, remote gathering has allowed us to connect with individuals who experienced barriers to in-person meeting, like those with childcare or eldercare obligations. Ultimately, successful community input depends on authentic relationship building – which we dedicate a tremendous amount of time and energy to.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs: i. Project Implementation ii. Anticipated Project Schedule, iii. Task/Activity Lead iv. Outputs

| Task 1 | Program Management: Cooperative agreement oversight; Qualified Environmental Professional (QEP) procurement; Site solicitation, selection and access |
| City of Portland will contribute its own resources to carry out programmatic oversight activities and grant administration, procurement, site solicitation, selection, and securing site access, project tracking and outcomes reporting. The Brownfield Program utilizes a list of on-call contractors from a Request for Proposals issued every 3 years, compliant with 40 CFR Part 31 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments. We work with partners who nominate sites and assist us with site prioritization based on need for assistance and community benefit. We secure access with City Attorney and site owners. EPA funds will not be used. |

| Task 2 | Schedule |
| Ongoing during the 3-year period of performance. Contractors will be ready because an active list is always in place in our Bureau. Site solicitation and site selection will be ongoing throughout the 3-year period of performance, with most anticipated to occur in the first 2 years. Sites will be selected primarily through ongoing coordination with our partners. To accommodate the timing realities of brownfield redevelopment, we will accept applications for assistance from eligible organizations, property owners, and prospective purchasers on a rolling basis, and will receive new applications until the funds are fully allocated. Securing site access will be ongoing until funds are fully allocated on existing sites. As soon as a specific site is approved for assessment, we immediately sign a site assistance contract and access agreement. |

| Task 3 | Lead |
| City of Portland (applicant) |
iv. Outputs
1 Work plan, 12 quarterly reports, 1 final report; 1 RFP, 2 active lists of on-call contractors; List of appropriate sites for grant support; Region 10 Eligibility Worksheets; Signed access forms.

Task 2 Community engagement
i. Project Implementation
EPA-funded tasks: funds for a community-based organization to design an outreach plan in collaboration with the Brownfield Program and provide involvement for our target area that may include culturally appropriate materials and inclusive meetings/events. EPA grant will also fund travel and publications that support community engagement. Non-EPA grant resources: the City contributes its own resources for a significant body of additional engagement work.

ii. Schedule
Ongoing during the 3-year period. The community-based organization’s work will be concentrated in the first two years. Staff will participate in monthly events through the life of the grant. National and local travel will occur annually each year for the full grant period. Publications and outreach materials will be developed as needed, approximately quarterly.

iii. Lead
City (applicant) will lead on community engagement, and will manage a Community Partner for a specific scope of work.

iv. Outputs
Publications and outreach materials approximately 2 times in 3-5 languages, 1 template for signage, project-specific signage as needed, 1 outreach plan from community organization, participation over 100 community meetings/events, attendance at 3 national (1 staff member) and 4-6 local/regional (2 staff members) trainings/conferences.

Task 3 Phase I environmental site assessments
i. Project Implementation
Grant funds will support a QEP to provide Phase I environmental site assessments on multiple properties, on a rolling bases as sites are selected.

ii. Schedule
Ongoing during the 3-year period of performance, approximately 3-4 per year Y1Q2-Y3Q3. We have eligible projects awaiting assessment dollars, so we anticipate our first assessments to begin within 3 months of a finalized workplan with EPA. Timing of each project depends on specific site needs, roughly 4-6 weeks per report.

iii. Lead
City of Portland (applicant) will oversee work that will be performed by a QEP (contractor)

iv. Outputs
10 Phase I Environmental Site Assessment reports.

Task 4 Phase II Environmental Site Assessments
i. Project Implementation
Grant funds will support a Qualified Environmental Professional to provide Phase II environmental site assessments on multiple properties, on a rolling basis as sites are selected, or following funded Phase I recommendations. Funds will also support ODEQ oversight costs related to Phase II work.

ii. Schedule
Ongoing during the 3-year period of performance, approximately 1 per quarter Y1Q3-Y3Q2. Phase II timing ranges from several weeks to several months, depending on project complexity.

iii. Lead
City of Portland (applicant) will oversee work, which will be performed by a QEP (contractor)

iv. Outputs
8 Phase II Environmental Site Assessment reports.

Task 5 Cleanup planning
i. Project Implementation
Grant funds will support a QEP to guide cleanup planning on multiple properties, on a rolling basis as sites are selected, or following funded Phase II work. Funds will also support ODEQ oversight costs related to Phase cleanup planning.

ii. Schedule
Ongoing during the 3-year period of performance, approximately 1 per year.

iii. Lead
City of Portland (applicant) will oversee work, which will be performed by a QEP (contractor)

iv. Outputs
3 Cleanup plans, 1 Analysis of Brownfield Cleanup Alternatives, 3 Hazardous Material Management Plans.

b. Cost Estimates

<table>
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<th>Budget Categories</th>
<th>Project Tasks ($)</th>
<th>Community Engagement</th>
<th>Phase I Assessment</th>
<th>Phase II Assessment</th>
<th>Cleanup Planning</th>
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Community Outreach activities maintain and expand connections with brownfield stakeholders, and involve organizations and individuals in the appropriate use of funds. Budget includes:

*Contractual funds* to enable a community-based organization to take the lead on certain target area community engagement activities. Budget includes $15,000 each for years one and two, and $10,000 in the final year, based on real costs of similar activities in our previous grant, = $40,000

*Travel funds* participation in pertinent brownfield-related training and conferences, including one national conference per year, and multiple local/regional/state events. $1,500/national conference x 3 years, + 2 regional events x $250 = $5,000

*Supplies* for translation, printing, and distribution for brochures, signage, and other brownfield outreach materials, based on past costs. 2 publications x $2,000 each for translation and printing, + $1,000 for signage and other outreach materials = $5,000

**Phase I Environmental Site Assessment (ESA)**

*Contractual funds* to provide ESAs, at an average cost of $5,000 based on past costs = $50,000

**Phase II Environmental Site Assessment** is the primary task of our grant plan.

*Contractual funds* to provide Phase IIs, at an average cost of $40,000 x 8 sites = $320,000. Costs vary significantly between sites. $40,000 is an average based on our past costs.

*Support Costs* cover DEQ cost recovery charges associated with project oversight for 4 sites, at an estimated $5,000 in regulatory oversight per site based on past costs = $20,000

**Cleanup Planning**

*Contractual services* provide the technical assistance necessary to move projects toward redevelopment, estimated at $15,000 per site based on past costs x 3 = $45,000

*Support Costs* for DEQ cost recovery charges associated with cleanup planning, at an estimated $5,000 in regulatory oversight per site based on past costs, x 3 = $15,000

c. Measuring Environmental Results

For each project, the Brownfield Program follows a tracking sheet outlining critical steps along the path from entry of a site into the program through to project completion. At appropriate milestones we will coordinate with our EPA Project Officer to ensure deliverables are as expected, and will also confer with them and our TAB provider if unexpected problems arise. Outputs will be recorded in ACRES as they are completed. We also track and report all outputs including Phase Is, Phase IIs, outreach plans, publications, key meetings / events, and cleanup planning reports in our quarterly report, along with project narratives. The quarterly report is an opportunity for us to measure accomplishments against workplan goals, and to chart budget and overall progress in the context of the full grant timeline. Our program tracks all funded projects in perpetuity, to measure outcomes even after a grant closes; this will include collecting images and narrative information of future site uses made possible by environmental assessment.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Program Capability: i. Organizational Capacity ii. Structure iii. Description of Key Staff

The Portland Brownfield Program has been providing technical and financial assistance for environmental issues since 1998. The city permanently funded the Program with 1.5 FTE dedicated to brownfield work. We are 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. We are committed to successfully carrying out the programmatic, administrative, and financial requirements of this EPA grant.

We will rely on our long-tested program and city organizational structure to ensure timely and successful expenditure of funds. First, sites will be identified through regular coordination with our extensive network of agency and community partners, as well as through new connections from ongoing outreach. To accommodate the timing realities of brownfield redevelopment, we select sites on a rolling basis until the funds are fully allocated. Once identified and selected for funding, program staff will coordinate administrative steps with EPA, including eligibility determination and approval. Site access will be secured using a process developed with our City Attorney’s Office. Our on-call contractors list will be used to conduct assessment work. Program staff will be responsible for all administrative requirements through the life of each 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 will 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, work outlined in this grant proposal 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 15 years, and during that time has managed eight 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 3.5 years. During this time she has provided extensive support and project coordination for our 2016 EPA assessment grant, 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 our own in-house Coordinated Site Analysis team that regularly performs environmental assessment work for City-owned properties. The Coordinated Site Assessment team includes a registered professional engineer, registered geologist, senior engineering associate, environmental specialist, environmental technician-II, and two seasonal field technicians. This team has a combined 75 years of experience with the investigation and cleanup of contaminated sites and is available to provide additional expertise as needed.

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 over 14 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.

iv. Acquiring Additional Resources

The Portland Brownfield Program utilizes a list of on-call contractors from a competitive Request for Proposals issued every three years. Contractor procurement is compliant with 40 CFR Part 31 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments. Small and disadvantaged businesses are actively engaged, and cost analysis is conducted. An active list is always in place, so contractors will already be available at the outset of the grant. For other areas of expertise, we can draw on our broad network of partners including Oregon Department of Environmental Quality, Multnomah County Health, Oregon Health Authority, regional government Metro, and community-based organizations. We do not anticipate any subrecipients for this grant.

b. Past Performance / Accomplishments: i. Previously Received an EPA Brownfields Grant

(1) Accomplishments  City of Portland’s three most recently closed EPA grants:

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 Oregon Department of Environmental Quality Oversight for 2 No Further Action letters. Outcomes included 11.3 acres of assessed land, petroleum and hazardous substances remediated, and 380 units affordable housing created. Outputs and outcomes are accurately reflected in ACRES as of this application submission.

BF-00J45201, EPA Brownfield Revolving Loan Fund awarded 2011.
Outputs included 3 Community Relations Plans, 3 Quality Assurance Project Plans, 3 Analysis of Brownfield Cleanup Alternatives plans, 3 Quality Assurance Project Plans, 3 Remedial Action
Plans, loan and subgrant documents, a Community Involvement Plan, 1 No Further Action letter (BRIDGE), and 3 Prospective Purchaser Agreement. Outcomes included 14.3 acres of assessed land, hazardous substances including heavy metals and solvents cleaned up, 1 nonprofit campus created on a former landfill, 1 long-time contaminated vacant parcel in the process of remediation, and 61 units affordable housing created. Outputs and outcomes are accurately reflected in ACRES as of this application submission.

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 as of this application submission.

(2) Compliance with Grant Requirements
City of Portland has no open EPA Brownfield Grants. Brownfield Program has managed 11 cooperative agreements with EPA, totaling $4,155,000. Our 3 most recently closed grants:

BF-00J45301, Brownfield Assessment Grant awarded 2011, closed 2015. Portland was fully compliant with the workplan, schedule, and terms and conditions of the 2011 grant. We successfully met quarterly performance deliverables, and updated our ACRES files in a timely and complete manner. One amendment to the grant schedule extended the term three months to provide time for final invoices to be processed. This amendment was clearly communicated with our Project Manager and properly documented. Throughout the life of the grant, we made steady progress towards achieving the expected results of the grant as described in our Cooperative Agreement. Our record of timely and acceptable quarterly reporting was 100%. All funds were fully dispersed for grant activities, and no funds remained at the time the grant closed.

BF-00J45201, EPA Brownfield Revolving Loan Fund awarded 2011, closed 2021. Portland was fully compliant with the workplan, schedule, and terms and conditions of the 2011 Revolving Loan. ACRES files were updated in a timely and complete manner. Amendments extended the grant term several times, as is typical for RLFs. Each extension was clearly communicated with our Project Manager and properly documented. Timely quarterly reporting was 100%. At the time our RLF grant closed in September 2021, $325,611 remained. While the 2022 RLF application does not distinguish between petroleum and hazardous expenditures, our 2011 Cooperative Agreement required 30% of funding be directed exclusively to petroleum projects. We successfully funded multiple hazardous cleanups but found that there were few sites meeting the fund’s petroleum eligibility requirements where a loan of this size and timeline met project needs. We made the strategic decision to focus our capacity on other resources.

BF-01J23801, EPA Brownfield Assessment Grant awarded 2016. City of Portland was fully compliant with the workplan, schedule, and terms and conditions of the 2016 Brownfield Assessment Grant. We successfully met quarterly performance deliverables, and fully updated our ACRES files in a timely and complete manner. There was one amendment to the grant schedule, extending the grant term 18 months (to close in September 2021) in response to new assessment needs related to Portland’s housing crisis, 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 quickly adjusted our work and were able to fully achieve the goals of the grant as described in our Cooperative Agreement. All funds were dispersed for grant activities, and no funds remained at the time the grant closed.
In this most recent assessment 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 additional amounts spent on travel, training, and outreach materials.
City of Portland EPA Site Assessment Application FY 2022: Threshold Criteria Responses

1. Applicant Eligibility
City of Portland is a General Purpose Unit of Local Government, and as such is eligible for funding.

2. Community Involvement
We use a variety of strategies to foster communication with our communities, both those who are directly affected by projects and those with a more general interest in brownfields. With all our outreach efforts, we are aiming not only to share information about projects and resources, but also to solicit feedback. Feedback informs the evolution and execution of project activities, from site selection through cleanup planning. We create opportunities to engage the variety of stakeholders impacted by brownfields and to generate critical discussion about brownfield redevelopment activities and resources. We receive comments and questions by email, telephone, website form, and in person at meetings and events. All comments are reviewed and addressed on an individual basis, and staff members personally respond to each request.

On an ongoing basis, we present at diverse meetings and forums; for example, attending a local organization’s event to discuss a cleanup in their area. We contribute to the email lists, newsletters, and websites of community and business organizations, to post updates on current and planned work. We distribute brochures and maps at many community gatherings and events. Our own digital newsletter has a distribution list of over 300 subscribers, and makes use of a media management application to better track our audience engagement and interest.

If language translation or ADA accommodations are needed, all materials are provided in alternative formats. Our multifaceted, grass-roots approach to communication enables us to reach those who may not be connected to more traditional outlets like neighborhood associations or large newspapers.

In this proposal we include budget to fund a community-based organization, selected through a compliant procurement process, for a specific piece of involvement work in our target areas. The nonprofit will design an outreach plan in collaboration with the Brownfield Program, and provide services that may include culturally appropriate outreach materials and inclusive meetings/events. to enable a community-based organization to take the lead on certain community engagement activities, including outputs of outreach materials and meetings.

As of the time of this application, we have had more than a year and a half to develop strategies for successful outreach that do not rely on in-person work. Many community forums have transitioned online, and we participate in partner, business, and neighborhood meetings online. In some ways, remote gathering has allowed us to connect with individuals who experienced barriers to in-person meeting, like those with childcare or eldercare obligations. Ultimately, successful solicitation of community input depends on authentic relationship building – and we dedicate a tremendous amount of time and energy to this work.
3. Named Contractors and Subrecipients

Contractors: N/A, City of Portland has not selected any procurement contractors or consultants for work proposed in this application. If our application for funds is selected, contractors and consultants will be selected in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500.

Subrecipients: N/A, City of Portland does not intend to have subrecipients for this award.

4. Expenditure of Existing Grant Funds

City of Portland does not have an open EPA Brownfields Assessment Grant.