Narrative Information Sheet

1. Applicant Identification:
   City of Chiloquin
   127 S First Avenue
   Chiloquin, OR 97624

2. Funding Requested
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested
      i. $402,500
      ii. Yes, the City is requesting a cost share waiver.
      iii. No, the City is not requesting a waiver of the $500,000 limit.

3. Location
   a) Chiloquin
   b) Klamath County
   c) Oregon

4. Property Information
   o Former Markwardt Brothers Garage - northeast corner of North 1st Ave. and Chocktoot St.,
     Chiloquin, OR 97624
   o ACRES ID# 250930

5. Contacts
   a. Project Director:
      Cathy Stuhr
cathystuhr@gmail.com
      (503)702-4974
      127 S First Avenue
      Chiloquin, OR 97624

   b. Chief Executive/Highest Ranking Elected Official
      Teresa Foreman, City Recorder
      chicityhall@gmail.com
      (541)783-2717
      127 S First Avenue
      Chiloquin, OR 97624
6. Population
   • 767

7. **Other Factors.** If none of the **Other Factors** apply to your community/proposed project, please provide a statement to that effect.

<table>
<thead>
<tr>
<th>Sample Format for Providing Information on the Other Factors</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>1</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
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<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
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<td>Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.</td>
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<td>The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).</td>
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<td>The proposed site(s) is in a federally designated flood plain.</td>
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<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
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<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
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<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>
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8. **Letter from the State or Tribal Environmental Authority:** See attached

9. **Releasing Copies of Applications**
   The applicant understands that the information included will be treated in accordance with 40 CFR §2.203. 
   No passages are considered confidential.
November 19, 2021

Terri Griffith
U. S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 155
(Mailstop: ECL-133)
Seattle, WA 98101

RE: DEQ Support for the City of Chiloquin’s FY2022 EPA Cleanup Grant Application for the former Marquart Brothers Garage site

Dear Ms. Griffith:

The Oregon Department of Environmental Quality is pleased to acknowledge the cleanup grant application from the city of Chiloquin. The focus of the grant is to conduct cleanup activities on the former Marquart Brothers Garage site, an important piece of property in the city’s vision for redevelopment.

The bulk of the grant, or $366,000 will be used to conduct cleanup activities, including removal of lead paint, asbestos abatement, abandonment and closure of at least one underground storage tank, and removal of an oil-change pit and two hydraulic lifts that were abandoned on site. Funds will also address management and off-site disposal of associated impacted soils.

The city intends to spend a portion of the grant on programmatic support, redevelopment planning efforts and community outreach to ensure a transparent public process as redevelopment decisions are made. The total budget is estimated to be $483,000.

Once property cleaned up and redeveloped, the site has potential to bring new jobs and business opportunities to Chiloquin. The city has plans for an indoor farmers market and may also lease out a portion of the space for essential small businesses. DEQ encourages EPA to fund the City of Chiloquin’s brownfield cleanup grant application.

Sincerely,

David Anderson
Eastern Region Cleanup Manage

ecc: Greg Svelund, DEQ, Bend
Katie Daugherty, DEQ, Portland
Teresa Foreman, Chiloquin City Recorder
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area: The cleanup of the former Markwardt Brothers Garage and Chiloquin Mercantile properties involves two tax parcels located at the northeast corner of West Chocktoot Street and North 1st Avenue in Chiloquin, Oregon (Klamath County Tax Parcels 3407-034DC-00500 and 3407-034DC-00400, census tract 9702, and EPA ACRES Number: 250930). The parcels were acquired on November 30, 2021, by the City of Chiloquin (Chiloquin/City). Chiloquin, population 767 (2020 Census), is located at the confluence of the Williamson and Sprague Rivers, in the Klamath Basin, 40 miles north of the Oregon-California border and 85 miles east of Medford. Chiloquin epitomizes the high desert area of Southwestern Oregon, and is the gateway to Central Oregon and Crater Lake National Park. The area is home to the Klamath, Modoc and Yahooskin people. This region is still the Treaty territory of the Klamath Tribes for hunting, fishing, gathering, cultural, and sustenance rights. Tribal members make up nearly half of our population.

Trappers from the Hudson’s Bay Fur Company first arrived in 1826 with European settlers arriving soon thereafter. A century later, the town of Chiloquin was incorporated in 1926. In its hay day, Chiloquin was a booming timber and lumber town, built quickly and cheaply. In the year of its incorporation, a fire consumed the downtown area. The former Markwardt Brothers building and the Chiloquin Mercantile building (the subject site of this application), date back to the City’s reconstruction after the downtown fire. With its healthy forests and associated economic opportunities, Chiloquin rebounded as a busy and thriving community with grocery stores, a bank, newspaper, hotels, movie house, lawyers, doctors, drug stores, dentists and a passenger railroad depot.

Unfortunately, during the century following this period of prosperity, the community was hit hard by a series of political, economic, and natural events, including, termination of the tribes’ Federal recognition, closing of the lumber mills, shuttering of the railroad depot, the Great Depression, flooding of the Sprague and Williamson rivers and a series of additional fires. In the 1960s and 1990s, the Sprague River flooded, damaging homes and businesses in the City and surrounding communities. Most recently, in September 2020 the Two Four Two Fire burned for more than two weeks. It burned southwards towards Chiloquin destroying 8 homes and forcing the evacuation of 482 others. Even with restoration of the Tribe’s Federal recognition and the Freedom of Religions Act, permanent social and economic impacts remain. Our community bank, lumber mills, newspaper, movie house, lawyers, drug stores, and dentists are all long gone and our cultural heritage struggles to heal.

Our cumulative losses and unique historic challenges, have created blight from deteriorating and vacant structures and properties (including the Target Site for this application), a lack of opportunities for jobs and services, known and suspected contamination from previous industrial and commercial uses and a lack of funds to address these issues. Chiloquin residents also struggle with daily needs. Many lack transportation and must travel 60 miles round trip to Klamath Falls to go to the bank, fill a prescription, buy a pair of shoes, or take a child to daycare. These conditions are of great concern to us especially due to the demographic make-up of sensitive populations within our community (see 2.a.ii). The combination of excessive poverty and low property values makes it difficult to rebound from disasters, such as the Two Four Two Fire, let alone make progress towards improving environmental conditions and implementing economic development initiatives. That is why the City seeks EPA funding for this important brownfield cleanup project.

1.a.ii. Description of the Proposed Brownfield Site(s): The property targeted for cleanup under this grant is the Former Markwardt Brothers Garage (Target Site), located on two tax parcels at the northeast corner of North 1st Ave. and Chocktoot St. (~ 1 acre). The former adjoining Chiloquin Mercantile building which recently collapsed is also included in the Target Site. The Target Site is situated at the heart of downtown Chiloquin, and is one of only a handful of historic buildings still standing. Sadly, unless this building can be remediated and restored, it will be demolished. An automotive service garage existed on this site since 1919, though the current building was built after the 1926 fire. The former uses include a gasoline service station that utilized an underground storage tank system, auto body repair shop, a warehouse, and most recently, a wood products packaging facility. Soil and groundwater samples were collected around former underground storage tanks, automotive repair bays, and areas suspected of impact from off-site environmental concerns. Assessments completed on the Target Site identified a release of petroleum to the soil associated with the previous gas station, evidence of up to two abandoned underground storage tanks remaining in-ground, asbestos containing materials (ACM) and lead-based paint (LBP), two hydraulic vehicle lifts, and an oil change/vehicle service pit, all present within the historic building footprint. These hazardous materials have the potential to affect the community, with adjacent commercial buildings and single-family residences located within 200 feet. These feature/conditions must also be addressed before the building can be repurposed.

1.b. Revitalization of the Target Area
1.b.i. **Reuse Strategy and Alignment with Revitalization Plans**: Between 2003 and 2007, the City, along with the Klamath Tribes and regional organizations, completed multiple economic opportunity analyses, business plans, and strategic plans for the downtown area. In 2018, the City completed a joint planning effort with the Klamath Tribes and Oregon Department of Transportation to create the *Chiloquin Community Pedestrian and Bicycle Plan*. In 2021, the City of Chiloquin revised its Strategic Plan to better understand current citizen interests and top priorities. Top priorities identified by the community include public/environmental safety and security, parks/outdoor gathering spaces, community health, and economic vitality. These plans collectively promote a common vision that Chiloquin is a “safe aesthetic community with a thriving and expanding business core that provides work opportunities for all ages.” As exemplified in this project, these plans layout key comprehensive community revitalization priorities, including: improving economic conditions, creating a safe attractive community with job opportunities, beautifying downtown, nurturing/educating/involving youth, ensuring growth shows respect for our cultural heritage and preserving our few remaining historic structures.

The City’s current economic development and revitalization projects (including the cleanup of the Target Site) are interconnected and align with the priorities listed above. For example, our Green Schoolyard Project will create a vibrant new outdoor space at Chiloquin Elementary School for kids and the entire community. This project will connect to a multi-modal path through town, funded by a recently awarded Oregon Community Paths(OCP) grant. The path project will begin in downtown Chiloquin where this grant application would support cleanup and renovation of the Target Site (a key historic structure in the heart of downtown); the path will continue through town and terminate at the former Mill Site, a prior cleanup completed in 2007 in part with EPA funds.

Through the community engagement processes listed above, and most recently in a November 4, 2021, community meeting detailed in Section 2.a.ii, the community has expressed an interest in reuse of the Target Site as a year-round farmers market, banking kiosk location, community services office, and small business incubator. The City will leverage the community engagement and planning efforts funded by its FY2021 EPA Brownfield Assessment coupled with supplemental community engagement efforts funded by this Grant to refine a plan for the highest and best use for the Target Site that aligns with community priorities.

1.b.ii. **Outcomes and Benefits of Reuse Strategy**: The revitalization of the Target Site will provide critical and essential resource investments in our community as we regain our footing and momentum following significant historic challenges and the recent impacts of the Two Four Two Fire and Covid-19. Although our historic buildings sit empty, our businesses and job opportunities are few and our resources are challenged, the community of Chiloquin abounds with physical, cultural, educational, and economic potential, poised to drive the City’s resurgence as a healthy and vibrant community.

The Target Site is the gateway to historic downtown along Chocktoot Street, and is one of the first buildings you see when you come into town. This project will save the Markwardt building from demolition and transform it from a rundown boarded up structure suggestive of poverty, blight, crime, and depression into an inviting indicator of economic vigor and community pride. By abating the hazardous building materials and equipment associated with the Markwardt Building, properly abandoning the UST(s) in place, and removing the hydraulic lifts and oil change pit, the building and associated property will provide a clean slate for community-driven reuse. Readying the historic building for reuse and preventing its demolition will preserve downtown Chiloquin’s historic character, reduce waste/burden on landfills, reduce fossil fuel consumption by reducing the number of trips residents make to Klamath Falls for basic needs, and reduce resource consumption associated with new construction. Depending upon the useable floor space and type of reuse ultimately selected, the revitalization of this building could generate between 10 and 20 new jobs (assuming a floor space of 12,316 sq ft and using a range of USEIA.gov estimates of jobs per square foot). Promoted by the property’s high visibility, the successful redevelopment will also catalyze adjacent redevelopment activity of historic properties in the downtown core being assessed under the City’s FY2021 Community-wide Assessment Grant. Based on their square footage and anticipated reuse options, revitalization of these buildings could create an additional 10 to 20 jobs. In fact during the November 4 Community meeting, one attendee who is relocating to Chiloquin stated that once the Markwardt building and others are remediated, She is interested in establishing a farmers market, banking kiosk location, community services office, and small business incubator. The City will leverage the community engagement and planning efforts funded by this Grant to refine a plan for the highest and best use for the Target Site that aligns with community priorities.

Cleanup and redevelopment of the Target Site will result in a cascade of additional redevelopment and reuse that will ensure Downtown Chiloquin will be a safe/walkable community with a thriving business district supplying the jobs and essential services (banks, pharmacy, and healthy food) currently unavailable to our community members. Beyond the tangible outcomes, the project’s success will provide a mechanism to address tension that has historically existed amongst the City’s once divided cultures by fostering a sense of community through a common place and the collaborative efforts to achieve a
common vision. With the success of this project, our community members will have a renewed hope and pride in Chiloquin.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: The City is eligible for many funding sources and will work with community partners, including South Central Oregon Economic Development District (SCOEDD), Oregon Main Street, Chiloquin Community Builders and Business Oregon to identify potential development partners willing to support the project and potentially rent space in the repurposed historic building.

To date, the City secured $48,000 in Business Oregon Brownfield Redevelopment Funds to complete a Phase I, a Phase II Environmental Site Assessment, and a pre-renovation asbestos and lead paint survey of the site. These due diligence activities facilitated the recent acquisition of the property. In the near future, the City plans to leverage matching funds from the EPA FY2021 Community Assessment Grant to secure a $58,000 Business Oregon Brownfield Cleanup grant to manage and properly dispose of a pile of debris containing asbestos located adjacent to the existing building. In preparing this application, the City leveraged its FY2021 EPA Brownfield Assessment grant funds to produce the draft Analysis of Brownfield Cleanup Alternatives (ABCA) and conduct the previously-referenced November 4, 2021 public meeting (combined leveraged value: $6,000). The assessment funds will also be used to implement a community led reuse planning process for the Target Site and other community properties.

The City is also eligible to apply for grants and loans that will support redevelopment activities following cleanup. Key grants are available from the USDA Community Facilities Program, which is applicable for both health and recreation projects, and the Oregon Main Street (OMS) program. In FY2023 the City intends to leverage this grant opportunity for cleanup as matching funds required for an Oregon Main Street Revitalization Grant (up to $200,000) sponsored by Oregon Parks and Recreation. The City participates in the OMS program through Chiloquin Community Builders, and will use this grant opportunity to make necessary structural and/or code-related improvements to the building/property.

1.c.ii. Use of Existing Infrastructure: Located in the heart of downtown, the Target Site is well served by municipal roads, water, sewer, power, and basic internet services needed for sustainable site reuse – no new infrastructure is needed. The City of Chiloquin is actively monitoring and pursuing rapidly emerging opportunities to bring broadband to our isolated rural community. In fact, opportunities for enhanced broadband service were identified during the November 4 community meeting. The future presence of broadband in the community would be a huge incentive for companies and high tech remote workers with better paying jobs to invest in the community. The cleanup funding under this grant will facilitate the restoration of an existing historic building that would otherwise be demolished. Further, rehabilitation and reuse of the Target Site will promote community interaction with area businesses and use of surrounding sidewalks and the City’s planned trail developments funded by a recently awarded OCP grant which will link the City’s downtown, the river, the Elementary school, and the former Mill Site, which is also the subject of planned redevelopment.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community’s Need for Funding: Chiloquin, is a small city with a poverty rate of 37.7% (twice as high as Klamath County as a whole, and triple the US rate (CENSUS). The elevated poverty rate equates to decreased income tax revenues. Oregon has no sales tax at the county or town level of government to use as a revenue generator. With lower property values, there is little ad valorem revenue to compensate. This is evidenced by the projected 2021-2022 City budget where General Fund income is projected to be $1,196,931 with $856,526 allocated to specific previously awarded grant-funded projects leaving only $340,405 to cover all our remaining general fund expenses (payroll, taxes, benefits, office expenses, building maintenance, etc.) leaving no remaining balance for expenditures on a matching grant for this important cleanup project. Further compounding need in the City are the devastating 2020 wildfire and COVID-19. Though the damage is still being assessed, the costs of fighting the Two Four Two Fire are estimated to have been $6.8 million. For the most part, State and federal resources are used to contain these fires, but these resources are diverted from forestry service and management of lumbering, which still accounts for 20% of payroll earned locally (Klamath County records). The cost to the municipality and property owners for cleanup and rebuilding adds to the economic hardship already experienced. With a population of just over 900 residents, the City has no remaining budget for environmental remediation expenditures; however, the City has a plan to move forward with remediation and subsequent reuse with the support of this proposed EPA grant as well as state funding provided by Business Oregon. This grant is crucial, as cleanup costs associated with the Markwardt site are economically infeasible given the City’s current financial status.

2.a.ii. Threats to Sensitive Populations:
(1) Health or Welfare of Sensitive Populations: Our community suffers greatly in terms of health and welfare threats that exist here. The majority of our citizens can be classified as members of sensitive populations. In our small community: 49.8% of our people are from minority races (primarily Native American); 40.5% are women of child-bearing years; 19.2% are children; and 16% of our people are aged 65 years and older (CENSUS). EJScreen data ranks these sensitive segments of our population (nationally) in the 64th percentile for people of color, 72nd percentile for population under age 5, and 86th percentile for population over age 64. Crime is a significant issue identified by Chiloquin residents in the city strategic plan. Chiloquin does not have its own police department, and local crime statistics are not readily available. Crime for the county as a whole is higher than the national averages (37 points on the property crime index vs 30.5 average for the US, with 1.0 being the best possible score; bestplaces.net). The aging vacant buildings in the downtown (including the Target Site) directly contribute to blight and the propensity for crime, such as vagrancy and drug use in the City. This is exemplified in a recent health and safety survey conducted by Chiloquin First where residents commented: “There are needles in the playground – kids can’t play there.” “The gunshots at night keep me awake!” “I am tired of being afraid.” “Chiloquin lacks safe public spaces for community gatherings and outdoor activities.” One other consideration is that the majority of our downtown storefront windows have been covered by plywood/siding to prevent vandals and thieves from damaging windows and stealing from local merchants. Said boarded/covered windows detract from the historic charm of the City, making the City seem as if it is an unwelcoming community, when in fact nothing could be further from the truth.

More than 37% of Chiloquin residents live below the poverty line; that number jumps to 48.8% among Native American residents and 53.5% among children under 18. Upward economic mobility in Chiloquin is hindered by a lack of access to jobs, with the City’s unemployment rate a staggering 26.5% compared to an unemployment rate of 5.5% for Oregon as a whole (CENSUS). Additionally, Chiloquin residents are at elevated risk for lead exposure as the community is in the 77th percentile of the EPA EJ Index for lead paint (EJSCREEN). The proposed cleanup and reuse plans (indoor/outdoor farmers market, bank kiosk, community service office, and small business incubator) would have substantial, positive economic and health impacts for our disadvantaged communities, and will specifically address pealing lead paint on all building surfaces.

According to the USDA Economic Research Service Atlas, the target area is a low-income, low-access tract with residents being more than 20 miles from a full-service grocery store that stocks fresh food. Compounding this, 25% of households in the Chiloquin area qualify for food assistance (SNAP) benefits, which means their ability to afford nutritious food is greatly compromised. Within the town of Chiloquin, 95% of children at the elementary school received free/reduced cost lunches (2018-2019 school year, Oregon Dept. of Education). Further, the impact of COVID-19 has been devastating to the welfare of our Community overall. We are a small rural community that is isolated from larger town amenities; hence, we keep our community in a healthy state of mind by hosting multiple community events. Due to the Pandemic, events like our yearly Rodeo, 4th of July BBQ and Parade, and our Tribal Pow Wow were either cancelled, or were held at a reduced capacity. These events bring our community together and give us a sense of purpose and well-being despite our economic and health-related challenges, so without these activities our people are suffering to a greater extent than normal. In the 2019 Klamath County Health Prioritization Survey (closest hospital care provider), 25.19% of respondents (second highest cause) cited poor physical or mental health for negative impact on their quality of life. It is highly likely that this already large percentage has increased with the effects of Covid-19 on our community.

The community engagement and planning activities funded by the proposed cleanup grant, and the City’s assessment grant will help to direct the community-driven reuse of the site. In addition to the proposed farmers market, part of the building and the adjacent land will provide an opportunity for a centralized community service office. This office may provide primary care and mental health services and youth services. This localized availability of services will facilitate improved well-being and promote reductions in crime that are due to drug use or behavioral health challenges. Youth recreation opportunities will engage young people and work towards preventing drug use and crime among our youth. Economic opportunities created through the proposed business incubator will improve the economic standing and living conditions for area residents. Creation of a year-round indoor/outdoor farmer’s market space will greatly improve access to fresh and healthy food for area residents. These reuse concepts will address health and welfare issues in the community, which will lead to improved living conditions for all our residents, but most importantly for our sensitive and disadvantaged populations. This project will enable the City of Chiloquin to ease visible signs of crime, anti-social behavior, and civil disorder by creating a downtown environment that residents are proud of, thereby discouraging further crime/disorder.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Health conditions in Chiloquin are exacerbated by exposure to brownfields, and lack of access to services and healthy foods. Contaminants that exist at the
Target Site include asbestos, lead, and petroleum. Further, the Site in the 83rd percentile for Particulate Matter (PM 2.5, EJSCREEN) compared to the State. These contaminants can have serious impacts on the health of our residents living in proximity to brownfields sites. Approximately 80% of our population lives within a half-mile radius of the Target Site, and other sites to be assessed by the City’s FY2021 EPA Community-wide EPA Assessment grant. As an example, Lead in the blood of children, even at low levels, can result in permanent damage to the brain and nervous system, leading to behavior and learning problems. Pregnant women are also highly vulnerable to lead exposure. The premature birth rate in Klamath County is 7.5%, the third highest among Oregon counties (OHA). Klamath County (7%) is also the second highest county in Oregon for low birthweight (OHA: 2015 Data). Klamath County has an infant mortality rate that is 4th highest among counties in Oregon (OHA: 2011-2015 Data). Asbestos, another contaminant at the Target Site, can cause asbestosis, a scarring in the lungs caused by breathing asbestos fibers; mesothelioma, a rare cancer of the membrane that covers the lungs; and lung cancer. The age-adjusted rate of mesothelioma in Klamath County is 19.4 (compared to the overall US average of 11.1). Klamath County is listed by the CDC as one of the top 50 counties in the country for this cancer. The Oregon Health Authority statistics report that Klamath County has an overall adult rate of asthma of 11.7% (OHA: Oregon Behavioral Risk Factors Surveillance System [BRFSS] 2014-2017 data) compared to 7.7% of U.S. adults reported by the CDC (2018 data). Breathing petroleum vapors can cause nervous system effects (such as headache, nausea, and dizziness) and respiratory irritation. Chronic exposure to petroleum products may also affect the blood and kidneys. Gasoline contains benzene, a known human carcinogen (CDC.gov). According to the Oregon Health Authority, in the Chiloquin census tract (Census tract 9702, which includes a significant population outside of the city) the age-adjusted cancer incidence rate has increased and is 214.5/100,000 (33% worse than Oregon as a whole). The assessment of sites and the cleanup of those contaminants can reduce these exposures and facilitate a healthy environment and lifestyle for area residents.

(3) Promoting Environmental Justice: The presence of brownfields, geographical and social isolation, and lack of government resources each impact the health and welfare of our residents, the majority of which belong to sensitive populations (section 1.a) and are prone to being hit hardest by adverse environmental conditions. Blight, lack of employment, poverty and proximity to the Target Site and brownfields in the immediate area can compound or trigger physical and mental health issues, such as depression and anxiety. According to EJ Screen, the Chiloquin area is in the 74th to 87th percentile (statewide) for all Oregon (OHA: 2011-2015 Data). Asbestos, another contaminant at the Target Site, can cause asbestosis, a scarring in the lungs caused by breathing asbestos fibers; mesothelioma, a rare cancer of the membrane that covers the lungs; and lung cancer. The age-adjusted rate of mesothelioma in Klamath County is 19.4 (compared to the overall US average of 11.1). Klamath County is listed by the CDC as one of the top 50 counties in the country for this cancer. The Oregon Health Authority statistics report that Klamath County has an overall adult rate of asthma of 11.7% (OHA: Oregon Behavioral Risk Factors Surveillance System [BRFSS] 2014-2017 data) compared to 7.7% of U.S. adults reported by the CDC (2018 data). Breathing petroleum vapors can cause nervous system effects (such as headache, nausea, and dizziness) and respiratory irritation. Chronic exposure to petroleum products may also affect the blood and kidneys. Gasoline contains benzene, a known human carcinogen (CDC.gov). According to the Oregon Health Authority, in the Chiloquin census tract (Census tract 9702, which includes a significant population outside of the city) the age-adjusted cancer incidence rate has increased and is 214.5/100,000 (33% worse than Oregon as a whole). The assessment of sites and the cleanup of those contaminants can reduce these exposures and facilitate a healthy environment and lifestyle for area residents.

(3) Promoting Environmental Justice: The presence of brownfields, geographical and social isolation, and lack of government resources each impact the health and welfare of our residents, the majority of which belong to sensitive populations (section 1.a) and are prone to being hit hardest by adverse environmental conditions. Blight, lack of employment, poverty and proximity to the Target Site and brownfields in the immediate area can compound or trigger physical and mental health issues, such as depression and anxiety. According to EJ Screen, the Chiloquin area is in the 74th to 87th percentile (statewide) for all standard Environmental Justice Indices. According to the Oregon Office of Rural Health, Chiloquin scores among the worst in the state in terms of unmet needs related to primary care, mental health care, and dentists. The entirety of Klamath County, which includes the target area, is a Medically Underserved Area (MUA). The shortages of primary care, dental, and mental health care providers and federally qualified health centers is evident. This means that residents here are more likely to suffer from or die from chronic health conditions that are caused or exacerbated by possible hazardous substances or petroleum contaminants from brownfields sites, such as the Target Site to be addressed through this project. To address these poor health and welfare issues affecting our sensitive populations, the grant strategy will focus on assessing and developing community driven reuse plans that will look to leverage funding for the City and Klamath County to improve health and welfare-related programs. For example, the Target Site may become a year-round farmers market with affordable healthy food alternatives supporting local farmers and ranchers, and provide a venue for a banking location and a business incubator, providing residents an alternative to driving or taking the bus 60 miles to benefit from these services. Remediation efforts funded by this project will allow the City to take actionable steps towards mitigating environmental threats to the community, and facilitate forward progress with respect to the community’s vision for a healthy and economically vibrant Chiloquin.

2. Community Engagement

2.a.i/ii Project Involvement & Roles: Project involvement and roles for our community organizations are presented below:

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<tr>
<th>Partner Name</th>
<th>Point of Contact</th>
<th>Specific Role in the Project</th>
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<tbody>
<tr>
<td>Chiloquin Vision In Progress/Chiloquin Community Builders</td>
<td>John Rademacher, Board President <a href="mailto:hasearad@centurytel.net">hasearad@centurytel.net</a> 541-891-4839</td>
<td>CVIP serves the area through projects that result in a healthy social, economic, natural, and cultural environment and will support reuse and redevelopment activities that foster community prosperity, health and well-being by providing community engagement, strategic partnership and reuse planning support</td>
</tr>
<tr>
<td>Healthy Klamath/Blue Zone</td>
<td>Kelsey Mueller <a href="">541-359-2802</a> <a href="mailto:Kelsey.mueller@HealthyKlamath.org">Kelsey.mueller@HealthyKlamath.org</a></td>
<td>In support of the Healthiest State initiative, Blue Zones encourage changes that lead to healthier options by bringing residents, worksites, schools, restaurants, grocery stores, and government together. Healthy Klamath/Blue Zone will assist the city with designing and conducting a community</td>
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Business Oregon provided the funding necessary to expedite the assessment of the Markwardt Building to facilitate the property transfer from the County to the City, and will be providing upwards of $58,000 to fund the removal of building debris from the collapsed Chiloquin Mercantile. The City will also look to Business Oregon to provide redevelopment-related funding as appropriate.

SCOEDD is a key conduit for regional economic development assistance and will provide professional staff to support economic redevelopment planning and site selection and prioritization. SCOEDD currently administers the EPA Assessment Program for Lake County, and will advise and provide resources on Brownfield matters, strategic planning and economic development.

HOI is a key member of the Chiloquin Elementary School Green School Yard project and will advise the brownfield team on needs and outdoor recreation opportunities for all community members.

OMS will provide support to develop a vision for redevelopment planning and then attract the people and financial resources to bring about the desired change. OMS can provide training, technical assistance and networking opportunities.

This community coalition sponsored by Klamath Tribal Health & Family. Services and Klamath County Public Health will work with the project to plan site reuse that will most benefit the community.

2.a.iii. *Incorporating Community Input*: The project goals in terms of its community engagement and partnership efforts are to achieve the following: 1) assist the public in contributing to and understanding the decision-making process during project planning, assessment phases, and cleanup, and the community’s role in that process; 2) give the public accessible, accurate, timely, and understandable information about the project as it moves forward; 3) ensure adequate time and opportunity for the community and community groups to provide informed and meaningful participation and for that input to be considered; 4) reflect on community concerns, questions, and information needs; and 5) respect and fully consider and include public input. The Brownfields team will develop a written Community Involvement Plan (CIP), with a focus on the cleanup of the Markwardt Brothers site, to document and formalize the process to share information and seek public input to decision-making. Input will be sought on site selection, project planning, and cleanup/reuse planning. This effort was initiated by the public meeting held on November 4, 2021 which was attended by 13 community members. This meeting presented the scope of and anticipated outcome of the planned cleanup and engaged the community in a discussion on desired reuse concepts for the Target Site. Further, the overall scope and benefits of the City’s FY2021 Community-Wide Assessment Grant were also discussed. If awarded, the City and their Qualified Environmental Professional (QEP) will hold a post-award public meeting, and will follow with bi-annual public meetings during the life of the project to provide the community with information on the progress of the cleanup.

As a small rural community, our entire population is potentially affected by the cleanup activities and will benefit from the reuse opportunities it will provide. Therefore, it is important that the public be given ample opportunity to submit suggested reuse concepts through community meeting participation. The City has designated Cathy Stuhr as the primary point of contact for the cleanup. Cathy can be reached best by email at cathystuhr@gmail.com. In our small rural town community feedback is most often communicated directly by community members. To reach out directly to community members Cathy and the City’s QEP will maintain communication with local officials, agencies, and residents. Project staff will attend civic organization meetings and provide updates on project activities and answer questions. A focused mailing list of local residents, organizations, businesses, and officials will be established. The mailing list will be used to ensure that those that do not have access to the internet or other information sources still have a way to receive information. News releases, fact sheets, newsletters, and social media updates summarizing current information about the project and describing upcoming activities (including public meetings) will be prepared and distributed to those on the project mailing and email lists. The City will prepare and release announcements to local newspapers and radio to provide information about events such as opportunities for public input, significant site investigation findings, completion of major milestones, important scheduling information, and other pertinent information. Social media outlets will also be employed to convey these messages. The City has established a Brownfield program Information Repository at City Hall, and duplicate documents are maintained at the Chiloquin Branch.
Petroleum Impacted Media and Underground Storage Tank (UST) Closure: the presence of UST(s) within the building will be confirmed by shallow excavation, then closed-in-place in order to preserve the structural integrity of the historic building. The closure activities will be completed in keeping with Oregon Department of Environmental Quality (ODEQ) guidance. The removal of approximately 100 SF of pavement and soil potentially impacted with petroleum products from top of the UST(s) will be required to confirm their presence, construction materials, and capacity. It is anticipated that approximately two feet of soil with likely petroleum impacts will need to be excavated from top of the UST(s), totaling approximately 7.5 cubic yards (CY). Upon confirmation and access, the USTs will be filled with an inert material, likely foam or flowable fill, to limit the potential for future releases and provide structural stability. An estimated 3,000 gallons of inert materials will be needed. The excavated area above the UST will need to be filled with approximately 7.5 CY of clean fill or gravel suitable to support typical intended uses within the building. Soil sampling will be conducted in accordance with ODEQ UST Decommissioning Guidance.

Automotive Service Bay Lifts and Oil Change Pit Closure: the relic hydraulic lifts and oil change pit will be inspected for remnant petroleum products, which if present will be removed for proper off-site disposal prior to removal. The removal will consist of excavating overburden concrete and soils around the installations, extracting the lift mechanisms, assessing soils beneath the lifts and oil change pit, then backfilling excavations. All remnant oils/fluids, concrete, soils, and scrap lifts will be directed for disposal or recycling at appropriately permitted facilities. Excavations will be backfilled with clean fill or gravel suitable to support typical intended uses within the building.

Abatement of ACM: In preparation for building renovation, the identified ACM within the building will be abated by a licensed abatement firm in accordance with the EPA Asbestos Hazardous Emergency Response Act (AHERA), ODEQ, and the Occupational Safety and Health Administration (OSHA) regulations. Identified material will be abated by licensed asbestos abatement workers, under the supervision of a licensed asbestos abatement supervisor, and under an approved asbestos abatement design plan. This design will outline the required personal protection equipment (PPE), negative pressure enclosures, disposal methods, work zones, and decon/clean rooms. Air monitoring will be performed to verify the efficiency of containment areas and to ensure the safety of the public or work personnel not in a designated work zone. Asbestos containing waste material will be double-bagged and labelled appropriately. Asbestos containing waste will be disposed of in keeping with applicable regulations at a licensed disposal facility.

Removal of LBP: Similarly, in preparation for building renovation, identified lead-based paint (LBP) will be abated by a licensed abatement firm in accordance with EPA, Oregon Health Authority, and OSHA regulations. The LBP will be scraped to the substrate and any debris will be collected utilizing a Class H wet/dry shop vacuum equipped with a High Efficiency Particulate Air (HEPA) filter. After all scrapable paint is removed, two coats of a clear lead encapsulate will be applied to stabilize any remaining LBP. The lead encapsulate will be applied using an airless sprayer. A toxicity characteristic leachate procedure (TCLP) lead test will be performed on all waste to determine the proper disposal methods.
### Task 1: Programmatic Support

#### i. Project Implementation:
- **EPA-funded activities:** Kick-off Meeting with City staff and QEP, ODEQ, and EPA; monthly status meetings (QEP/City); quarterly reporting to EPA; ACRES entries; final report and closeout documentation; annual reporting including financial forms and WBE/MBE forms; Davis Bacon & Historic Preservation Division reporting
- **Non-EPA grant resources:** Oversight by the Project Director and City staff

#### ii. Anticipated Project Schedule:
- Pre-award through closeout in Month 15; kick-off meeting in Month 1 (Oct 2022); monthly status meetings (Months 1-15); quarterly reports (Months 4, 7, 10, 13, 15); closeout report in Month 15

#### iii. Task/Activity Lead(s):
- Project Director, assisted by QEP

#### iv. Output(s):
- 2 attendances at brownfields conferences (2 City staff at National conference and 2 City staff at Region 10 Brownfields Conference in 2022); signed contract for professional environmental services (completed); 1 kickoff meeting; 15 monthly meeting summaries and action items; 5 quarterly reports to EPA; ACRES data entry; annual financial and MBE/WBE reporting; Davis Bacon & Historic Preservation Division reporting; EPA financial drawdowns; 1 closeout report

### Task 2: Cleanup & Reuse Planning

#### i. Project Implementation:
- **EPA-funded activities:** Cleanup Planning: Final ABCA; Development of QAPP and HASP; UST, Hydraulic Lift, and Oil Change Pit Closure Design; Asbestos & LBP Abatement Design; Reuse Planning: Revisions to existing site plan to incorporate additional community feedback relative to building reuse.
- **Non-EPA grant resources:** Project Director/City staff oversight and coordination with ODEQ

#### ii. Anticipated Project Schedule:
- Cleanup Planning: Months 1-4 (ABCA / subject to public input). Reuse Planning: Months 1-15

#### iii. Task/Activity Lead(s):
- QEP will lead this task due to its technical nature, the Project Director will support

#### iv. Output(s):
- Cleanup Planning: Final ABCA; QAPP and HASP; UST, Hydraulic Lift, and Oil Change Pit Closure Design; Asbestos & LBP Abatement Design; Reuse Planning: Revised site plans per environmental agency and community input.

### Task 3: Cleanup Activities

#### i. Project Implementation:
- **EPA-funded activities:** Soil excavation, testing/confirmatory sampling; disposal at Subtitle D landfill; UST closure in place; lift removal; oil-change pit removal; soil backfill; ACM and LBP abatement of structures on site; compliance reporting.
- **Non-EPA grant resources:** Project Director/City staff oversight.

#### ii. Anticipated Project Schedule:
- Months 5-24; ACM and LBP abatement, UST closures, lift and oil-change pit closure/backfilling

#### iii. Task/Activity Lead(s):
- QEP will lead due to technical aspects. City will support.

#### iv. Output(s):
- removal of approximately 10 CY of potential petroleum-impacted media (concrete and soil) above the USTs and around lifts; Closing 2 USTs in place using foam or similar inert product; removal of 2 in-ground hydraulic lifts; removal of 1 oil change pit; abatement of approximately 5,200 SF of ACM; Removal of approximately 4,800 SF of lead-based paint

### Task 4: Community Outreach/Involvement

#### i. Project Implementation:
- **EPA-funded activities:** Completion of a CIP, Community meetings/visioning sessions; Preparation of Former Markwardt Brothers Garage Brownfields Brochure;
- **Non-EPA grant resources:** City staff time, meeting space, and procurement of consultant (completed); Invoice payments and EPA financial drawdowns; Tracking leveraged funding

#### ii. Anticipated Project Schedule:
- Pre-award through closeout in Month 15; The CIP and Brownfields Brochure will be created pre-award. The four community meetings/design charrettes are planned for Months 3-15.

#### iii. Task/Activity Lead(s):
- Project Director and Project Coordinator, supported by QEP

#### iv. Output(s):
- CIP; Former Markwardt Brothers site Brownfield Brochure; 2 cleanup-specific community meetings/reuse visioning sessions with responses to comments/documentation
### 3.b Cost Estimates

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1 The City is applying for a cost share waiver of the 20% cost share (Note Personnel, Fringe Benefits, Equipment, Other, and Indirect Costs not shown as amounts are zero.)

**Task 1 – Programmatic Support $36,000:** Travel: $6,000 for two City staff members to attend one National Brownfields Conference in 2022 and one Region 10 Brownfields Conference during the grant period (2 staff @ 2 events @ $1,500 each - per event cost breakdown: registration $350; flight $400; ground transport/parking $100; 3 hotel nights at $150/night = $450; and 4 days per diem at $50 = $200). Supplies: $1,000 includes $500 for printing materials and $500 for mailing and other expenses associated distribution of public notices. **Contractual: $17,000:** $2,000 for kickoff meeting (16 hours @ $125 for meeting attendees and prep time); $7,500 for 5 quarterly reports, including ACRES entries and annual forms as-needed (5 @ $1,500 / 60 hours @ $125); Davis Bacon and Historic Preservation Division reporting at $2,500 (20 hours @ $125); monthly meetings for project team updates at $3,000 (6 meetings @ $500 each); and a closeout report for $2,000.

**Task 2 – Cleanup & Reuse Planning $80,000:** **Contractual: Cleanup Planning - $40,000 - Final ABCA $5,000 (40 hrs @ $125); QAPP and H&S Plan will be created by the Qualified Environmental Professional for $10,000 (80 hrs @ $125); UST, Hydraulic Lift, and Oil Change Pit Management - $80,000 - Updated site plans, including engineering considerations, will be produced for an estimated cost of $40,000 (320 hrs @ $125).**

**Task 3 – Cleanup Activities $366,000:** **Contractual: Permitting, Planning, Bidding and Design Phase Investigation - $65,000 – In preparation of field work, the following will need to be completed: permitting, subcontractor coordination, and design phase investigation (240 hrs @ $125 & $35,000 for sample/lab, drilling sub, survey crew, and investigative waste disposal).** Petroleum Impacted Media; UST, In-Ground Hydraulic Lift, and Oil Change Pit Management - $80,000 - Excavation, transport, disposal and backfilling approximately two feet of impacted soil & concrete located on top of the USTs/lifts/oil-change pit, totaling approximately 10 CY @ $1,000 / CY = $10,000. USTs filled with an inert material, likely foam, approximately 3,000 gallons @ $10/gallon = $30,000. UST closure sampling $6,000 ($1,000 sample/lab cost & 40 hours @ $125). In-ground hydraulic lift removal and sampling $15,000 ($5,500 per lift (2) removal and backfill; $500 = sample/lab cost, & 28 hours @ $125). Oil change pit abandonment and sampling $19,000 ($15,000 pit removal and backfill, $500 = sample/lab cost, & 28 hours @ $125). Asbestos Containing Material (ACM) Abatement - $67,000 – Abatement mobilization & prep $6,250 - ACM will be properly abated by a licensed abatement firm. The following materials need to be abated: Interior plaster skim coat 3600 SF @ $15 = $54,000; interior wallboard joint compound 800 SF @ $7.50 = $6,000; window caulk 30 LF @ $25 = $750. **Lead-Based Paint (LBP) Paint Abatement - $48,000 –** LBP will be abated by a licensed abatement firm. The following materials need to be abated: 3,600 SF of exterior cement block paint @ $10.00 = $36,000; 1,200 SF of interior wood-paneling paint @ $10.00 = $12,000. **Project Oversight & Compliance Reporting - $45,000 –** Engineering oversight & air monitoring will be needed during ACM & LBP abatement for 20 days @ $1,500/day = $30,000. An UST Closure report will be completed for $5,000. A Lift Removal and Oil-Change Pit Abandonment Report will be completed for $5,000. Abatement Closeout Report will be completed for the ACM & LBP materials for $5,000.

**Contingency (Approximately 20% of $305,000 the subtotal of above subtasks) - $61,000 –** This contingency budget will be available in the event additional remedial efforts are needed.
Task 4 –Community Outreach $18,000: Contractual: $18,000 A CIP is planned at $3,000 (set fee); Creation of a brownfields brochure specific to the cleanup and reuse activities at the former Markwardt Brothers Garage for $3,000; Four community meetings/design charrettes at $12,000 total (4 @ $3,000 each) for making the community aware of ongoing cleanup activities and provide opportunities for valuable input into reuse planning activities.

3.c Measuring Environmental Results
City staff and the QEP will track progress of Outputs against the project scope identified above via monthly project meetings and at completion of significant milestones. This includes draft/final CIP; community meetings; final ABCA; selection of remedial subcontractors; closing USTs in place, removal of lifts, oil-change pit abandonment, associated soil excavation including disposal; asbestos abatement including disposal; lead-based paint abatement including disposal; and overall cleanup completion. Project Outcomes include community partners attending meetings, property (acres) made ready for reuse, and dollars leveraged. All outputs and appropriate outcomes will be entered into EPA’s ACRES database and included in quarterly and final reports. In the event deviations in schedule are identified during status meetings, the Project Director and Coordinator will work with the QEP to determine the best actions to get the project back on schedule. Fortunately, remediation of the Target Site is not anticipated to take the allowable 3-year grant period and is anticipated of being completed within 15 months of grant initiation, allowing extra time for unexpected delays/findings. The City will report specific outcomes and status during regularly scheduled community engagement meetings conducted per the CIP and through ACRES.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE
4.a Programmatic Capability
4.a.i/ii/iii Organizational Capacity/Structure & Description of Key Staff: As is the case with the City’s FY2021 Community-wide Assessment Grant, The Cleanup grant will be managed by Teresa Foreman, City Recorder. Ms. Foreman will also serve as financial director. Ms. Foreman is the chief financial officer for the City and is responsible for maintaining all financial records and reports, and provided fiscal administration of all grant-funded programs cited in table provided late I this section. Assistant City Recorder, Ms. Kimberly Cowie will support all programmatic and community engagement efforts. Cathy Stuhr will administer Day to day project activities. Ms. Stuhr has 25 years of experience in community development, planning, engagement, environmental assessment/remediation, and program management. She will report directly to Ms. Foreman. Ms. Stuhr will also oversee the QEP. Should changes in staff occur, the City has processes in place to replace staff without significant impacts or interruption to project progress.
4.a.iv Acquiring Additional Resources: The funding used to develop the ABCA for this project was completed by the City’s QEP under our FY21 EPA Assessment grant, contracted in accordance with local and federal procurement requirements at 40 CFR 200.317-200.326, which included the advertisement of a Request for Qualifications and the review of multiple proposals by a selection committee. Under a separate procurement process, City will select a QEP for this Cleanup grant project through a fair and open bid process, fully consistent with federal procurement requirements 2 CFR 200 and EPA’s Rule 2 CFR 1500. We will select a QEP with experience in Brownfield Cleanup project implementation. Procurement of any licensed abatement contractors or subcontractor(s) will follow all state and federal fair and open competition requirements as outlined in 2 CFR Part 200 and Part 1500. The City has formal systems in place to replace critical staff and hire additional contractors, if needed.
4.b Past Performance and Accomplishments
4.b.i Currently Has or Previously Received an EPA Brownfields Grant: The City of Chiloquin was awarded a 2021 Brownfields Community-wide Assessment grant of $300,000. This project has been initiated and it funded both the November 4, 2021 community meeting and the development of the required draft Analysis of Brownfield Cleanup Alternatives report. The City has allocated the majority of this funding to specific site assessment and redevelopment planning initiatives, and intends to close out its assessment grant within 24 months, so as to position the City for future funding.
   (1)Accomplishments: Though early in the grant cycle, the City has completed the kick-off meeting with EPA, filed 4 Site Eligibility Forms, completed 3 Phase I ESAs, and a Phase I ESA update for the Markwardt property. Further, the City has completed a generic QAPP, CIP, and Brownfields Brochure. The site assessment tasks completed (outputs) and realized outcomes have been entered into EPA’s ACRES database.
   (2)Compliance with Grant Requirements: To date, The City has complied with the EPA-approved work plan, schedule, and terms and conditions for the FY2021 grant. The first quarterly report for grant pre-award services was submitted to EPA on October 29, 2021. Further site assessment grant activities have been entered into EPA’s ACRES database. The first drawdown for FY2021 Assessment grant will be completed in late December 2021 or January 2022. The City plans to expend all assessment grant funds by 9/30/23, or 12 months in advance of the required grant closeout date.
Threshold Criteria Responses
III.A Threshold Criteria for Cleanup Grants

1) **Applicant Eligibility**
   The City of Chiloquin is eligible to apply for an EPA Brownfields Cleanup Grant as a local government as defined under 2 CFR § 200.64.

2) **Previously Awarded Cleanup Grants**
   The Markwardt Brothers Garage property has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3) **Expenditure of Existing Multipurpose Grant Funds**
   The City of Chiloquin affirms it does not have an open EPA Brownfields Multipurpose Grant.

4) **Site Ownership**
   The City of Chiloquin affirms that it is the owner of the subject site for this Cleanup Grant as of November 30, 2021. The City affirms that, if awarded Cleanup Grant funds, it will retain ownership of the subject 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) Site Name: Former Markwardt Brothers Garage Assemblage
   b) Site Address: Northeast Corner of West Chocktoot Street and North 1st Avenue, Chiloquin, Oregon 97624 (42.576885, -121.86260)
   c) Klamath Tax Assessor Parcel ID#s 3407-034DC-00500 and 3407-034DC-00400
   c) Current Owner: City of Chiloquin, Oregon

6) **Status and History of Contamination at the Site**
   a) **whether this site is contaminated by hazardous substances or petroleum;** The Site is contaminated by petroleum and hazardous building materials, specific contaminants include asbestos, lead, and petroleum constituents
   b) **the operational history and current use(s) of the site;** The Site is an assemblage of two commercial parcels. The southern parcel supported two adjoining commercial buildings. The southernmost building operated from the at least 1919 through the 1960s as an automotive repair garage and gasoline filling station. Petroleum-containing underground storage tank(s) and in-ground hydraulic lifts were installed on the Site and are now abandoned in-place. The northern building supported an approximately 4,000 square foot brick building occupied by the Chiloquin Mercantile. The building was constructed in the 1920s and operated as a commercial business until the 1980s when it was vacated. In 2019 the building collapsed. The north parcel is vacant undeveloped land.
   c) **environmental concerns, if known, at the site;** Petroleum contamination has been discovered in soil and groundwater in the vicinity of historical underground storage tanks and automotive repair bays. Hazardous building materials, asbestos-containing materials (ACM) and lead-based paint (LBP) were discovered in the on-Site building. Abandoned underground storage tanks, in-ground hydraulic lifts, and an oil-change pit remain on the property and require proper decommissioning prior to building reuse.
   d) **how the site became contaminated, and to the extent possible, describe the nature and extent of the contamination.** Site was contaminated by historical gasoline filling station and automotive repair operations at the former Markwardt Brothers Garage. Specifically, up to two USTs and two in-ground
hydraulic lifts are still present in the garage, and concentrations of total petroleum hydrocarbons, 1,2,4-trimethylbenzene, and/or xylenes have been discovered in three soil borings and samples from two monitoring wells. Asbestos was identified in association with multiple materials installed in the former garage building, including joint compound on drywall, plaster skim coating, and penetration caulk. LBP was also identified on garage’s exterior cement-masonry unit walls and interior wood-paneled ceilings.

7) **Brownfields Site Definition**
   The City of Chiloquin affirms the Site is:
   a) not listed or proposed for listing on the National Priorities List;
   b) 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) not subject to the jurisdiction, custody, or control of the U.S. government.

8) **Environmental Assessment Required for Cleanup Grant Applications**
   A Phase I ESA and Phase I ESA update were completed prior to property acquisition (May 11, 2021 and November 29, 2021, respectively). A Phase II Environmental Site Assessment (ESA) was completed by Cardno, Inc., at the Site in accordance with American Society of Testing and Materials ASTM E1903-19, and the final report was issued on November 2, 2021.

9) **Enforcement or Other Actions**
   The City of Chiloquin affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the Site for which Brownfields Grant funding is sought.

10) **Sites Requiring a Property-Specific Determination**
    The Site does not require a property-specific determination in order to be eligible for funding.

11) **Threshold Criteria Related to CERCLA/Petroleum Liability**
    a) **Property Ownership Eligibility – Hazardous Substance Sites**
        iii) **LANDOWNER PROTECTIONS FROM CERCLA LIABILITY**
            (1) **Bona Fide Prospective Purchaser Liability Protection**
                The City of Chiloquin acquired the Site after January 11, 2002, and is asserting the Bona Fide Prospective Purchaser (BFPP) liability protection according to the following criteria.
                i. The City of Chiloquin acquired ownership property after January 11, 2002.
                iii. The City of Chiloquin is not liable for contamination at the Site, nor is the city affiliated with any person potentially liable for the contamination. The City of Chiloquin has no familial, contractual, financial, or corporate relationships that are the result of a reorganization of a business entity with potential liability.
                iv. The City of Chiloquin affirms all disposal of hazardous substances at the Site occurred before it acquired the property, and further that the City of Chiloquin neither caused nor contributed to any release of hazardous substances at the
Site. The City of Chiloquin affirms that it has not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

v. The City of Chiloquin affirms it has taken appropriate care through reasonable actions to address releases, including stopping continuing releases and preventing threatened future releases and exposures to hazardous substances on the Site.

vi. The City of Chiloquin has/will comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls associated with response actions at the site.

vii. The City of Chiloquin has/will provide full cooperation, assistance, and access to authorized persons.

viii. The City of Chiloquin has and will comply with any CERCLA information requests and administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.

ix. The City of Chiloquin has/will not impede performance of a response action or natural resource restoration.

(2) Demonstrate that the applicant meets the requirements for the BFPP CERCLA liability protection.

i. Information on the Property Acquisition:

   (i) the City of Chiloquin acquired ownership by quit claim deed;

   (ii) the City of Chiloquin acquired the property on November 30, 2021;

   (iii) the City of Chiloquin has fee simple title for the property;

   (iv) the City of Chiloquin acquired the property from the Klamath County; and

   (v) The City of Chiloquin has no familial, contractual, corporate, or financial relationships or affiliations with the prior owners or operations (or other potentially responsible parties) of the Site.

ii. Pre-Purchase Inquiry Describe any inquiry by you or others into the previous ownership, uses of the property, and environmental conditions conducted prior to taking ownership. Please include the items below in your description.

   (i) An ASTM E1527-13 compliant Phase I Environmental Site Assessment of the Site was performed on behalf of the City of Chiloquin.

   (ii) Mr. Ashton Smithwick of Cardno, Inc., performed the Phase I Environmental Site Assessment. His qualifications to perform such work are shown in the Phase I ESA Report “Qualification/signatures of Environmental Professional(s).”

   (iii) The Phase I ESA was issued on May 11, 2021 and updated on November 29, 2021, within 180 days of Site acquisition.

iii. Timing and/or Contribution Toward Hazardous Substances Disposal

The City of Chiloquin affirms the following:
(i) all disposal of hazardous substances at the Site occurred before acquisition of the property;
(ii) the city did not cause or contribute to any release of hazardous substances at the Site.
(iii) the city has not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

iv. Post-Acquisition Uses
Since acquiring ownership of the Site, the City of Chiloquin has secured the property and maintained the vacant status.

v. Continuing Obligations
Describe in detail the reasonable steps you took with respect to hazardous substances found at the site to:

(i) stop any continuing releases: There are no continuing releases from the Site and there were none at the time of property acquisition. The Site building has been secured to limit any public trespass.
(ii) prevent any threatened future release: Subsurface contamination is relatively isolated/limited and not mobile
(iii) prevent or limit exposure to any previously released hazardous substance: the Site has been secured, contamination is either subsurface or in the structures/fenced-enclosure and not likely to create exposure concerns

The City of Chiloquin confirms their commitment to:

(i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;
(ii) assist and cooperate with those performing the cleanup and provide access to the property;
(iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
(iv) provide all legally required notice.

b) Property Ownership Eligibility – Petroleum Sites

i. INFORMATION REQUIRED FOR A PETROLEUM SITE ELIGIBILITY DETERMINATION

(1) Current and Immediate Past Owners
Current Owner: City of Chiloquin
Immediate Past Owner: Klamath County

(2) Acquisition of Site
The Site was acquired on November 30, 2021, by fee simple sale (quit claim deed)

(3) No Responsible Party for the Site
Neither the current nor immediate past owner: (i) dispensed or disposed of petroleum or
petroleum product contamination, or exacerbated the existing petroleum contamination at the Site; (ii) owned the site when any dispensing or disposal of petroleum (by others) took place; and (iii) took reasonable steps with regard to the contamination at the site.

(4) **Cleaned Up by a Person Not Potentially Liable**
The City of Chiloquin did not dispense or dispose of petroleum or petroleum product, or exacerbated the existing petroleum contamination at the site, and took reasonable steps with regard to the contamination at the site.

(5) **Judgments, Orders, or Third-Party Suits**
No responsible party (including the applicant) is identified for the site, through either:
(a) a judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the Site; or
(b) an enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or clean up the Site; or
(c) a citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the Site.

(6) **Subject to RCRA**
The Site is not subject to any order under § 9003(h) of the Solid Waste Disposal Act.

(7) **Financial Viability of Responsible Parties**
No responsible party has been identified.

12) **Cleanup Authority and Oversight Structure**

a) The Site will be remediated under authority of Oregon Department of Environmental Quality (ODEQ), which has been entered into a Voluntary Letter Agreement (ODEQ ECSI No. 6462). The City of Chiloquin will contract for the services of a qualified engineering firm experienced in Brownfields redevelopment to perform cleanup oversight activities and related services. The selected firm will be procured in full compliance with the federal procurement provisions of 2 CFR 200.317 through 200.327. A draft Analysis of Brownfields Cleanup Alternatives (ABCA) was issued on November 2, 2021. A detailed scope of work for cleanup activities will be developed based on the ABCA results, previous assessment results, and upon notification of award of this grant. The City of Chiloquin will develop a Quality Assurance Project Plan as required by EPA Region 10 prior to initiating any confirmatory sampling activities on the Site. The City of Chiloquin will provide general project oversight and environmental coordination through its selected, qualified environmental engineering firm. ODEQ will also provide technical review of all remedial documents, upon request. The City of Chiloquin will comply with all applicable federal and state laws and ensure that the cleanup protects human health and the environment.

b) Regarding potential impact to adjacent or neighboring properties, the City of Chiloquin will continue to work closely with the community to develop a site access plan to minimize inconvenience to neighboring residents and businesses. The City of Chiloquin will hold information meetings for surrounding residents/businesses prior to commencement of cleanup activities in...
order to receive input on site access issues and to receive recommendations on this topic. The subject property is located on at the corner of two streets with adequate site access and it is not anticipated that remedial activities or installation of remediation equipment will cause disruptions of business or lack of access to residential properties. Site access from adjacent property owners is not anticipated. Should such access be required, the City of Chiloquin will enter into site access agreements outlining locations of equipment and remedial activities and conditions agreeable to adjacent property owners. An OSHA health and safety plan will be developed to ensure that potential health and safety issues will be addressed for workers under OSHA 1910.120 and the surrounding community.

13) Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives
   The community was offered an opportunity to comment on our proposed grant application and the draft Analysis of Brownfields Cleanup Alternatives (ABCA) at our public meeting held on November 4, 2021, and through our Community Notification ad, which stated these documents were available for review. The draft ABCA summarized information about the Site and contamination issues, cleanup standards, applicable laws, cleanup alternatives considered, and the proposed cleanup. It also included information on the effectiveness, the ability of the grantee to implement each alternative, the ability of the applicant to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost of each proposed cleanup alternative and an analysis of the reasonableness of the various cleanup alternatives considered, including the proposed cleanup.

b. Community Notification Ad
   A community notification ad was published on October 25, 2021, in the Chiloquin News newspaper (Volume 18, Issue 43). The community notification ad (or equivalent) clearly stated:
   i. that a copy of this grant application, including the draft ABCA(s), is available for public review and comment;
   ii. how to comment on the draft application;
   iii. where the draft application is located (City Hall); and
   iv. the date, time, and location of the public meeting(s).
   All target communities, including community members with limited English proficiency and community members with disabilities, must receive the notification and be provided an opportunity to comment on the application.

c. Public Meeting
   The City of Chiloquin held a public meeting to provide the community with notice of its intent to apply for this EPA Brownfield Grant and allow the community an opportunity to comment on the draft proposal on November 4, 2021, at 6:00 pm at the Chiloquin Community Center located at 104 South First Street, Chiloquin, Oregon (presentation attached).

d. Submission of Community Notification Documents
   The following are attached to the application:
   i. a copy of the draft ABCA(s);
   ii. a copy of the newspaper ad (or equivalent) that demonstrates solicitation for comments on the application and that notification to the public occurred at least
calendar days before the application was submitted to EPA.

iii. the comments or a summary of the comments received;

iv. the applicant's response to those public comments;

v. meeting notes or summary from the public meeting(s); and

vi. meeting sign-in sheet/participant list.

If one or more of the above-requested attachments are not submitted with the application, please explain why the requested attachment is not included.

14) **Statutory Cost Share**

The City is requesting a hardship waiver of the cost share, based on our limited resources for environmental cleanup. The City confirms that this project cannot proceed if the cost share Hardship Waiver is not granted. (Hardship Waiver Request attached.)

15) **Waiver of the $500,000 Limit**

Not Applicable.

16) **Named Contractors and Subrecipients**

Not applicable, the applicant will select contractors including the QEP in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500. EPA.