1. Applicant Identification:
Columbia Pacific Economic Development District
375 S. 18th Street, Suite B
St. Helens Oregon 97051

2. Funding Requested
a. Grant Type: Individual RLF
b. Federal Funds Requested
i. $1,000,000
ii. Not Applicable

3. RLF Boundaries
a) Cities of St. Helens, Garibaldi, Cornelius, Tongue Point (unincorporated Clatsop County)
b) Clatsop County; Columbia County; Tillamook County; Washington County
c) Oregon

4. Target Area and Priority Site Information
Applicants, other than tribal governments:
- Tongue Point; City of Helens; City of Garibaldi; City of Cornelius
- CT9503; CT9707; CT9602; CT329.01
- Blue Ridge Drive Assemblage, Tongue Point, Clatsop County;
  Waterfront Assemblage, Saint Helens, Columbia County;
  Garibaldi Dry Dock, Garibaldi, Tillamook County;
  Former Baseline St. Gas Station, Cornelius, W. Washington County

5. Contacts
Project Director
Sarah Lu Health
PO Box 1535
St. Helens Oregon 97051
971.328.2877
SarahLu@nworegon.org

Chief Executive/Highest Ranking Elected Official
Ayreann Colombo, Executive Director
Columbia Pacific Economic Development District
375 S. 18th Street, Suite B
St. Helens Oregon 97051
971.757.5040
acolombo@nworegon.org

6. Population
St. Helens: 13,817
Garibaldi: 803
Cornelius: 12,638
Tongue Point (unincorporated Clatsop County): 3,911
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>Information on the Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>1, 2</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td></td>
</tr>
<tr>
<td>The priority site(s) is impacted by mine-scarred land.</td>
<td></td>
</tr>
<tr>
<td><strong>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).</strong></td>
<td>2</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td></td>
</tr>
<tr>
<td><strong>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</strong></td>
<td>2, 3</td>
</tr>
<tr>
<td><strong>The reuse of the priority site(s) will incorporate energy efficiency measures.</strong></td>
<td>2, 4</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></td>
</tr>
</tbody>
</table>

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

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 Columbia-Pacific Economic Development District’s Application for a Revolving Loan Fund Brownfield Grant

Dear EPA Brownfield Grant Manager:

The Oregon Department of Environmental Quality supports Columbia-Pacific Economic Development District’s (Col Pac) application for an EPA Revolving Loan Fund (RLF) brownfield grant. If awarded, the majority of funding will support brownfield cleanups throughout the Col Pac service area that include the counties of Clatsop, Columbia, Tillamook, and western Washington. These counties span a variety of interests and needs, from agriculture to infrastructure planning in rural and suburban communities.

Brownfield RLF funding will support Col Pac’s mission to diversify and strengthen the economy and livability of northwest Oregon. Col Pac provides a variety of economic and community development assistance throughout the region, including the development of financial packages for infrastructure improvements and capacity building for local committees and councils.

The target areas of Tongue Point (Clatsop County), City of St. Helens (Columbia County), City of Garibaldi (Tillamook County), and City of Cornelius (Washington County), all contain brownfield sites and represent the variety of needs and opportunities throughout the region.

DEQ is pleased to support Col Pac’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: Melyssa Graeper, DEQ
Rebecca Wells-Albers, NWR/DEQ
Terri Griffith, USEPA
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

1.a.i. Background and Description of Target Area: Columbia Pacific Economic Development District (Col Pac) is a non-profit organization established to assist in diversifying and strengthening the economy and livability of the Northwest Oregon community. The proposed EPA Brownfields Revolving Loan Fund (RLF) will be used for RLF activities in Target Areas and across the Col Pac service region, which covers approximately 5,200 square miles in Clatsop, Columbia, Tillamook, and western Washington counties. Northwestern Oregon supports a population of approximately 170,000 (4% of Oregon’s total population) primarily concentrated in rural communities of less than 10,000. The region holds abundant natural resources, creating opportunities for recreation and employment, but also plagued the growing impacts of climate change. Fishing, food production, and timber have been the primary drivers of the regional economy for the last century. All of these sectors are climate dependent. The Fifth Oregon Climate Assessment, a report issued by the Oregon Climate Change Research Institute (2021) warns that extreme weather, natural disasters (floods and wildfires), and marine hazards (potential tsunamis) have increased in number and severity, resulting in significant impacts to residents, including health, displacement, and income loss. Without intervention, these threats are expected to worsen. Flooding from extreme rain events and sea level rise can exacerbate the environmental impacts from brownfields by spreading hazardous materials and contaminated soil across our communities. In addition to the challenges of climate change, real or perceived environmental impacts from brownfields in our area (detailed in section 1.a.ii) are deterring developers from moving forward with redevelopment projects that will have a catalytic impact on our community. Cleaning up and redeveloping brownfields in the Col Pac region is paramount to the health and welfare of residents, and to building a stable, greener economy. The proposed project Target Areas and corresponding census tracts (CTs) include the following:

Tongue Point (CT 9503 – pop. 3,911) located in unincorporated Clatsop County is a peninsula that juts into the mouth of the Columbia River just a few nautical miles before the river meets the Pacific Ocean. The area, located on the northeastern tip of Clatsop County, was of historic strategic military importance and supported a vibrant maritime industry, but following withdrawal of the Navy in 1962, the area is now known as a haven for illicit drug use, methamphetamine production, and vagrancy. More than 15 blighted and abandoned structures still exist on the Point. Previous uses in the area contributing to contamination of brownfields include maritime vessel production, maintenance/service of motors and engines, and artillery training and ammunition storage. Each of these former uses have had lasting impacts on general community health and the environment (see sections 1.a.ii and 2.a.). The cleanup funding offered by the Col Pac RLF will serve as a resource to developers interested in repurposing Tongue Point to provide much needed housing and jobs.

St. Helens Downtown Waterfront (CT 9707 – pop.4,091): The City of Saint Helens is located on the west side of Columbia County where the Lewis and Lake Rivers join the Columbia River, 70 nautical miles from the Pacific. In the mid-1800s, the location attracted those settlers seeking to establish ports along these vital waterways. St. Helens was built on the timber industry, which shipped goods along the Columbia River and sustained the St. Helens economy well into the 20th century. In 1954, the City reached a population of five thousand and embraced its five wood-products companies in promoting itself as a “Payroll City.” As the county's old-growth forests disappeared, so did most of the businesses and jobs, leaving behind more than 100 acres of vacant environmentally impacted land adjacent to the Columbia River, including a waterfront priority site.

The City of Garibaldi (CT 9602, Block 2 – pop. 876) was the first community to be settled by Europeans in Tillamook County. The city is located on Tillamook Bay which empties into the Pacific just 2 miles west of Garibaldi’s port. A large air naval station operated here during World War II. Lumbering and agriculture, particularly dairy, were the mainstays of the economy until the mid-1950s when wildfires decimated the timber industry in the County. A smokestack from the long-abandoned
Whitney Lumber Mill still towers over the downtown area and several other brownfields still dot the small town’s waterfront, including the priority site described in the following section. Today a tourist industry supports mostly low-paid service sector jobs, with the tourism industry suffering staggering blows in 2020-21 due to the COVID-19 pandemic.

**Downtown Cornelius** (CT 329.01 – pop. 6,549): The City of Cornelius, located in western Washington County, came into existence with the arrival of the railroad and European settlers in the mid-1800s. Western Washington County is inland and wedged between the coastal counties to the west and the Portland suburbs to the east. The major industry in Cornelius was once lumber, until the majority of the forests were cleared or succumbed to wildfires. Today, agriculture is the main industry in Cornelius. The City is bisected by the Portland & Western Railroad with Downtown just north of the railroad right-of-way. An approximately 40-acre area located along the railroad and Baseline Street corridor contains several abandoned, underutilized, or vacant properties, including the priority site described in the following section.

The greatest needs within the Col Pac service area are workforce housing and living-wage job creation. Col Pac will utilize the RLF program to attract investors to in-need communities in our service area to facilitate the creation of suitable jobs and appropriate housing options.

**1.a.ii. Description of the Priority Brownfield Site(s):** Priority sites have been selected and reuse concepts have been developed in part with public input garnered through a series of community engagement meetings held in August 2021 and organized in preparation for this application. A Business Oregon Brownfield Interim Planning Grant funded this community outreach effort. Site nomination forms were distributed to interested stakeholders from each of the four Col Pac counties and communities, including communities where the priority sites are located. During the meetings, nominated sites were prioritized based on potential for contamination, proximity to residents, and potential for purposeful reuse that will contribute to the economic and physical health within impacted communities in the region. This series of meetings led to the selection of 25 sites in the Target Areas that met criteria stated above. Of these sites, one priority site from each Target Area that was most likely to successfully leverage the RLF program was selected as a priority site. Below are description of each priority site along with planned redevelopment scenarios identified during prior community engagement meetings (and/or from planning/redevelopment strategies outlined in 1.b.1):

**Blue Ridge Assemblage, Tongue Point,** Clatsop County (CT9503): This assemblage along Blue Ridge Drive in the uplands of Tongue Point contains 9 parcels covering approx. 60 acres. The area is dotted with blighted vacant structures that have the potential for lead and asbestos due to the age of buildings (constructed as military housing and support buildings in the 1940s). Multiple underground and aboveground storage tanks are present on and around the Point with the potential for petroleum contamination. One site central to the assemblage is a former methamphetamine lab in an abandoned structure partially destroyed by fire. This particular site is unsecured and is often occupied by transients. The assemblage consists of former military housing and support buildings adjacent to the former Naval Air Station Tongue Point. Developers expressed interest in the assemblage. Planned redevelopment: suitable workforce housing that incorporates energy/renewable energy efficiencies.

**Waterfront Assemblage, Saint Helens,** Columbia County (CT9707): These two parcels span 81 acres along the riverfront and are adjacent to downtown. The sites housed a wood veneer processing plant and lumber mill, where known petroleum, arsenic, and solvent-containing products were used in varying quantities. While the structures have been demolished, the foundations and paved surfaces remain. The property lies adjacent to the Columbia River. As such, a number of developers have expressed interest in redeveloping the property. These properties are true catalyst sites given their waterfront location and the fact that are immediately adjacent to St. Helens’ historical downtown. Planned redevelopment: multi-purpose commercial/professional space with potential living-wage employment/job creation; a residential component that incorporated renewable energy efficiencies.

**Garibaldi Dry Dock, Garibaldi,** Tillamook County (CT9602, Block 2): This former dry dock and
marine repair facility at the Port of Garibaldi is currently unsecured with potential for contamination from fiberglass, petroleum, degreasers, and metals. The property borders Tillamook Bay, just three miles from the Pacific Ocean. The site lies adjacent to the Port of Tillamook Bay Railroad immediately south of downtown Garibaldi. Planned redevelopment: multi-purpose commercial with potential for living-wage employment/job creation and community waterfront amenities.

**Former Baseline Street Gas Station, Cornelius, W. Washington County (CT329.01):** This vacant gas station is located at a corner on the main thoroughfare in downtown Cornelius. The site has underground storage tanks with likely petroleum contamination. The site lies on a busy intersection in the heart of downtown and is not only an eye sore, but a blighted and unsecured reminder of the recent economic downturn in the area. Planned redevelopment: mixed use commercial/professional space with potential for energy efficient intergenerational housing.

### 1.b. Revitalization of the Target Area

#### 1.b.i. Reuse Strategy and Alignment with Revitalization Plans:

Col Pac in collaboration with County and municipal governments, residents and community groups developed the 2018-2023 Northwest Oregon Comprehensive Economic Development Strategy (CEDS). The plan combines and coordinates the economic development activities of Col-Pac, the NW Oregon Economic Alliance, the NW Oregon Area Commission on Transportation, the NW Oregon Workforce Investment Board, the North Coast Regional Solutions Team, and economic development councils of Clatsop, Columbia, Tillamook and western Washington Counties. The CEDS provides a regional framework and overview to NW Oregon’s economic development landscape, drawing upon the needs, issues, goals and strategies of the region’s local, regional, State and federal partners and private industry. The CEDS is a flexible and dynamic planning document that is reviewed annually, with a full update every five years.

Drafting of the CEDS constituted a collaborative effort, with input through public meetings with public partners and private stakeholders. Another key addition in the 2018–2023 CEDS is the inclusion of the North Coast Regional Solutions Team (RST) mission and priorities, which mirror those of Col-Pac’s. The RST, established by the Governor in 2014, provides direct connections to the Governor’s office and State agencies with the unique goal of solving complex problems through collaboration between community stakeholders and State and local agencies. The economic development goals, strategies and performance measures in NW Oregon’s CEDS are a composite of the region’s local economic development service delivery system. Based on their own identified needs and issues, local partners identify key projects that meet their economic development goals, which are then matched with potential funding or collaborative partners using the CEDS platform. The regional approach allows for cross-pollination of projects, development expertise and regulatory agency involvement so critical in our time of limited resources. The goals of the plan include the following: attracting new jobs and investments; diversifying the local economy; supporting the creation and expansion of rural and small community businesses; providing business opportunities for low-income workers and their families; supporting the financial community by providing additional funding sources; and securing secondary loan financing for local customers.

Further, the proposed project and reuse strategies identified at each priority site are in alignment with local revitalization plans, such as the Urban Growth Boundary (UGB) for each community. Under Oregon law, each of the state’s cities and metropolitan areas has created an urban growth boundary around its perimeter, a land use planning line to control urban expansion onto farm and forest land. By focusing on purposeful reuse of brownfields, the Col Pac project ensures compliance with UGBs and achievement of UGB goals; For instance, the City of Garibaldi UGB objectives are focused on identifying long-term housing needs and meeting those needs. In addition, the State of Oregon Department of Energy (ODOE), responsible for Oregon’s long-term energy planning, will provide expertise to support renewable energy project development across the state through the Regional Solutions Team (consulted in the development of this application).

#### 1.b.ii. Outcomes and Benefits of Reuse Strategy:

The reuse strategies were developed through a
planning process for this application (described in section 1.a.ii) and through the CEDS update process that involves community participation, thereby enhancing chances for success. The outcomes and benefits of the plans and this project include the following: new jobs and investments through the leveraging of funds and resources; diversification of the local economy through new attracted opportunities; creation and expansion of rural/small community businesses; and secondary loan financing for local customers. Redevelopment of the priority sites alone will result in these estimated outputs: more than 120 acres redeveloped; minimum estimated 100 jobs with living wages; and potential of $20 million dollars in community investments. The implementation of renewable energy projects at RLF sites in the related EJ communities will result in lower energy costs, decreased carbon emissions; and improved air quality, as sites are redeveloped.

1. c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: The reuse of redevelopment of brownfield sites across the Col Pac service area, and in particular those communities associated with the priority sites, will enhance the economic competitiveness of NW Oregon’s smaller communities. With limited staff and limited budgets, small communities are less competitive when seeking grants. A key element of the Col Pac area CEDS described above is to identify support funding for top ranked projects and to facilitate the leveraging of funding from a variety of agencies/sources to encourage a broad level of support for specific projects, including the modernization of infrastructure technologies such as broadband Internet, and green energy. Col Pac also plans to facilitate the submission of an FY23 EPA Brownfields Coalition Assessment Grant with its partner communities. Once brownfield conditions are assessed and funds are available for clean-up, a regional package of development sites can be marketed by Col Pac along with potential funding programs to assist with redevelopment, such as the following.

ODOE Renewable Energy Grants offer developers and business grants to install and operate renewable energy projects, up to $250,000 per project. ODOE is also offering the Energy Efficient Wildfire Rebuilding program, a new incentive program to promote energy resilience and small-scale clean energy projects. At the Tongue Point site, an access road that meets suitable road standards in order to be traversable by tractor trailer trucks with heavier loads in transit to the existing commercial park is essential. Clatsop County developed a transportation plan (2015) with a target to optimize access to the Tongue Point area in cooperation with Oregon Department of Transportation. With support from this project (through investor incentives that accelerate development), the funding for the road upgrade could be prioritized. Col Pac will support eligible developers in grant application processes. All funds and resources will facilitate the transition of environmentally impacted properties towards effective sustainable reuse and redevelopment. Further, Business Oregon, the state's economic development agency, offers grants and loans to businesses and entrepreneurs investing in Oregon communities. Business Oregon also offers grants for cleanup and remediation. Col Pac has a proven track record of supporting businesses in applying for and securing these funds. These funds would be suitable for the redevelopment of sites, once they are assessed, acquired, and ready for movement towards purposeful reuse and redevelopment, such as are planned for priority sites.

1.c.ii. Use of Existing Infrastructure: Col Pac will utilize existing infrastructure, including utilities and roadways, to create sustainable development opportunities within the target area. All existing roadways surrounding the target areas will be utilized to facilitate optimal land use and sustainable redevelopment. All redeveloped parcels will be connected to the existing sanitary sewer and public potable water system as appropriate. By encouraging infill development, the project sites will reduce the pressure to build on greenfield properties, thereby eliminating the need to extend power, water, and sewer lines to new sites; decreasing the carbon footprint; and fostering stronger community ties by providing accessibility to resources and amenities.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding: Factory closures, natural disasters, and growing poverty
levels have left the target communities and the region with few resources to fund brownfields cleanup and revitalization. Oregon has no sales tax at the county or town level to generate revenue. Each of the target communities get approximately 20% of their budget from property taxes, and with lower property values in comparison to the state average (see table below), there is less ad valorem revenue to fund essential programs.

<table>
<thead>
<tr>
<th>Economic Conditions</th>
<th>Tongue Point - CT9503</th>
<th>St. Helens - CT9707</th>
<th>Garibaldi - CT9602</th>
<th>Cornelius - CT0329.01</th>
<th>Oregon</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ave. property values</td>
<td>$246,800</td>
<td>$219,300</td>
<td>$229,200</td>
<td>$284,300</td>
<td>$326,500</td>
</tr>
<tr>
<td>Poverty</td>
<td>17%</td>
<td>14.6%</td>
<td>11.5%</td>
<td>8.7%</td>
<td>13.2%</td>
</tr>
</tbody>
</table>

In parts of the Col Pac service area, approximately 1 out of 6 households live in poverty (Col Pac CEDS). The region is also experiencing growing homelessness rates despite higher vacancy rates in the target areas. For instance, CT 9602 (Garibaldi) has a housing vacancy rate of over 50% that can be partially attributed to aging blighted housing and population loss. This condition is truly alarming, given that the state housing vacancy rate is just 8.9% (US Census, ACS 5-year estimate, 2019 [ACS, 2019]). Compounding need in the region are the devastating 2020 and 2021 wildfires and the current COVID-19 crisis which have hit NW Oregon’s travel and service sectors hard.

Col Pac cannot provide loans or subgrants from its current budget for environmental cleanup, as available funds are tied strictly to particular economic development activities. In order to make loans/grants for activities related to assessment or cleanup, these grant funds are essential. Further, these smaller communities do not have the capacity to administer loan/grants programs such as this.

2.a.ii. Threats to Sensitive Populations

1) Health or Welfare of Sensitive Populations: In the target areas, these sensitive populations are impacted by health and welfare issues:

<table>
<thead>
<tr>
<th>Sensitive Populations</th>
<th>Source: US Census, 5-year estimate, 2019</th>
<th>Tongue Point CT9503</th>
<th>St. Helens CT9707</th>
<th>Garibaldi CT9602</th>
<th>Cornelius CT0329.01</th>
<th>Oregon</th>
</tr>
</thead>
<tbody>
<tr>
<td>Children</td>
<td>17%</td>
<td>22.6%</td>
<td>12.6%</td>
<td>27.8%</td>
<td>20.5%</td>
<td></td>
</tr>
<tr>
<td>Of child-bearing years</td>
<td>37.2%</td>
<td>41.6%</td>
<td>33.6%</td>
<td>45.6%</td>
<td>38.8%</td>
<td></td>
</tr>
<tr>
<td>Minority</td>
<td>16.5%</td>
<td>11.4%</td>
<td>19.9%</td>
<td>34.7%</td>
<td>11.2%</td>
<td></td>
</tr>
<tr>
<td>Elderly (65+)</td>
<td>19.8%</td>
<td>12%</td>
<td>17.6%</td>
<td>10.8%</td>
<td>17.2%</td>
<td></td>
</tr>
</tbody>
</table>

At St. Helens’ Lewis and Clark Elementary, 61% of children receive free or reduced lunch with 35% minority enrollment, and at Cornelius Elementary, 84% receive free or reduced lunch with 90% minority enrollment, indicating that a majority of families in these target areas are living close to or at poverty levels (nces.gov, ACS, 2019). For minority populations, about 25% live below poverty level, twice the region’s average (Col Pac CEDS). The 2019 CPCCO Health Assessment (see next section) indicated that on average 21% of children in the region face food insecurity. The presence of brownfields in the region invites opportunity for crime, such as trespassing or illicit activity. Crime in the target areas impacts the welfare of our target area communities; in 2019 the crime rate in St. Helens rose by 8% and in the Tongue Point area of Clatsop County property crime is 38.74 incidents per 1,000 people, which is nearly ten times the rate of the southern parts of the County (city-data.com). Lack of adequate or affordable workforce housing across the state has lasting impacts on both sensitive populations and typical households. The 2020 Annual HUD Review found homeless rates of 35 per 10,000 people in Oregon: only three states had a worse homeless rate. The aging population means skilled workers are being removed from the labor force at an increasing rate. Without jobs or appropriate housing options, younger generations are forced to leave the area.

Redevelopment concepts for the priority sites 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 predominant sensitive populations. This project will enable the Target Areas to begin to erase the visible signs of crime and blight by assessing and developing cleanup, and more importantly reuse and disposition strategies for blighted and underused properties like the priority sites.

2) Greater Than Normal Incidence of Disease and Adverse Health Conditions (Health data in the
region is only available at the county level) Clatsop, Columbia and Tillamook Counties are in the Columbia Pacific Coordinated Care Organization (CPCCO), which conducts a regional health assessment. The 2019 CPCCO Health Assessment (most recent) indicated that the leading cause of death across the region is cancer, followed by heart disease and chronic respiratory disease. The potential contaminants at the priority sites include lead, asbestos, petroleum, fiberglass, solvents, and degreasers, all of which can cause cancer, heart disease, or respiratory issues. These counties are considered Medically Underserved Areas (MUAs) by the US Health and Human Services Administration, meaning that not enough health care providers exist in the area to adequately serve the population. This fact emphasizes the need to remove potential contaminants from the priority sites in order to remove additional health risk factors for these communities. Washington County is also considered an MUA as well as an area of Medically Underserved Populations of low-income persons and low-income seasonal migrant workers, emphasizing the health impacts on sensitive populations in this target area. Further, the Washington County Community Health Improvement Plan (2020-2023) noted that behavioral health and chronic conditions were of greatest concern, which can also be worsened by the blighted conditions related to brownfields and associated contaminants. The proposed grant funding will mean that quantifying and addressing environmental issues will be made possible in areas that may not otherwise be addressed; thereby, eliminating possible health impacts on sensitive populations in the target areas.

(3) Promoting Environmental Justice: The target areas are located in areas with significant environmental justice issues, having high percentages of sensitive populations living in close proximity to priority sites. The following table outlines susceptibility percentiles of risks in Target Areas according to EPA EJ Screen:

<table>
<thead>
<tr>
<th>Target Area</th>
<th>PM 2.5</th>
<th>Ozone</th>
<th>Air Toxics Can Risk</th>
<th>Lead Paint Indicator</th>
<th>Superfund Proximity</th>
<th>Hazardous Waste</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tongue Point (CT9503)</td>
<td>69</td>
<td>68</td>
<td>69</td>
<td>29</td>
<td>42</td>
<td>67</td>
</tr>
<tr>
<td>St. Helens (CT9707)</td>
<td>62</td>
<td>62</td>
<td>61</td>
<td>25</td>
<td>55</td>
<td>57</td>
</tr>
<tr>
<td>Garibaldi (CT9602-Blk 2)</td>
<td>61</td>
<td>58</td>
<td>64</td>
<td>26</td>
<td>62</td>
<td>69</td>
</tr>
<tr>
<td>Cornelius (CT0329.01)</td>
<td>77</td>
<td>77</td>
<td>77</td>
<td>79</td>
<td>78</td>
<td>86</td>
</tr>
</tbody>
</table>

EJ Indexes (https://ejscreen.epa.gov/mapper); >50 %ile bold

In these Target Areas, the sensitive populations are disproportionately impacted by the economic shifts over the past few decades (leading to unemployment and homelessness) and the presence of brownfields in their neighborhoods. Income levels remain stagnantly low in the Target Areas, where a higher percentage consist of sensitive populations, which constitutes an EJ concern. This grant will help address some of those environmental justice challenges, by facilitating the redevelopment of brownfield sites to mitigate health risks, introduce new businesses and services, create jobs, and build new, quality, affordable housing directly in the Target Areas. Through this project, Col Pac can assist the Target Areas with overcoming the Environmental Justice barriers to transform their community. These funds will provide the communities the needed catalyst to overcome the barriers to reuse.

2.b. Community Engagement

2.b.i. Program Involvement and 2.b.ii. Program Roles: In addition to the supporting organizations noted below, Col Pac will work with groups identified in cooperation with the Target Area communities as the project progresses.

<table>
<thead>
<tr>
<th>Organization</th>
<th>Point of contact</th>
<th>Specific involvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clatsop Economic Development Resources</td>
<td>Kevin Leahy, <a href="mailto:kleahy@clatsopcc.edu">kleahy@clatsopcc.edu</a> ; 503 338-2402</td>
<td>Will identify funding sources for developers and communities to move projects towards completion</td>
</tr>
<tr>
<td>Astoria-Warrenton Area Chamber of Commerce</td>
<td>David Reid, <a href="mailto:David@oldoregon.com">David@oldoregon.com</a> ; 503-6311</td>
<td>Will identify potential developers or business interested in the project and assist with site selection</td>
</tr>
<tr>
<td>Seaside Chamber of Commerce</td>
<td>Brian Owen, 503-738-6391 <a href="mailto:CEO@seasidechamber.com">CEO@seasidechamber.com</a></td>
<td>Will help to solicit community input for potential project sites</td>
</tr>
<tr>
<td>Cannon Beach Chamber of Commerce</td>
<td>Jim Paino, 503-436-2623 <a href="mailto:jim@cannonbeach.org">jim@cannonbeach.org</a></td>
<td>Will promote community meetings and activities to enhance community input in the project</td>
</tr>
</tbody>
</table>
2.b.iii. Incorporating Community Input: Col Pac has a robust community engagement network that is headed by its 24-member volunteer Board of Directors. Col-Pac convenes local public and private leaders including representatives from county commissions, cities, ports, local business and business organizations and workforce development and community colleges. The Col Pac Brownfield team (staff and consultants), with public input, will develop a written Community Involvement Plan (CIP) that will document and formalize the process to share information and seek public input to decision-making. Input will be sought on project planning, site selection and cleanup/reuse planning. The goals, in terms of its community engagement and partnership efforts, are to insure or achieve the following: Assist the public in contributing to and understanding the decision-making process during cleanup, and the community’s role in that process; Give the public accessible, accurate, timely and understandable information about the project; Ensure adequate time and opportunity for the community to provide informed and meaningful participation, and for that input to be considered in public meetings held annually or as requested; Reflect community concerns, questions and information needs; Respect, fully consider and respond to public input throughout the process. Col Pac staff will attend at least one meeting in each priority community at least once per year to update community members on project progress. Col Pac will also publish quarterly updates on project progress through its website and through local social media outlets.

Col Pac will use Zoom meetings for community meetings in the event of social distancing or other restrictions as a result of COVID-19 remain in place. Community input would also be solicited via online surveys through Col Pac website or distributed via email or text.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS
a. Program Description and Marketing Strategy
i. Program Management: Certified by the U.S. Economic Development Administration (EDA) as a designated Economic Development District, Col-Pac offers a range of economic and community development services, technical assistance and financing in carrying out its mission. Col-Pac also has a seven member Loan Administration Board that oversees the District’s Revolving Loan Fund. Col Pac will be responsible for all Brownfields RLF operations and implementation as Col Pac has built an experienced and competent team to ensure the effectiveness of the RLF program. Three staff members will oversee and conduct the operations of the RLF, as described in section 4. Col Pac also has a legal team that will review program documents and agreements. The Col Pac team are familiar with administering loans and subgrants. Col Pac has human resource and procurement processes in place to replace key staff and to solicit for and hire any additional contract services should that be needed.

In the time between the RLF award announcements and the signing of the cooperative agreement, Col Pac will establish an RLF Committee that includes the staff noted above, the contracted Qualified Environmental Professional (QEP), representatives from the target area local governments, from the

<table>
<thead>
<tr>
<th>Organization</th>
<th>Point of contact</th>
<th>Specific involvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Columbia Economic Team</td>
<td>Paul Vogel, 503-805-5139</td>
<td>Will identify potential developers and promote meetings community members</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:paulvogel@columbiacountyoregon.com">paulvogel@columbiacountyoregon.com</a></td>
<td></td>
</tr>
<tr>
<td>Clatskanie Chamber of Commerce</td>
<td>Monica Seidl, <a href="mailto:monicasieidl@umpquabank.com">monicasieidl@umpquabank.com</a></td>
<td>Will solicit community input for potential project sites for project inclusion beyond the priority sites</td>
</tr>
<tr>
<td>First Presbyterian Church-Astoria</td>
<td>Pastor Bill Van Nostran, 503-325-1702;</td>
<td>Community group and potential property owner would engage community members in reuse planning</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:pastorbill@FPCAstoria.org">pastorbill@FPCAstoria.org</a></td>
<td></td>
</tr>
<tr>
<td>Rainier Chamber of Commerce</td>
<td>Meagan Fawcett, <a href="mailto:meagan@cpfoodbank.org">meagan@cpfoodbank.org</a></td>
<td>Will solicit community input for potential project sites for selection included beyond the priority sites</td>
</tr>
<tr>
<td>South Columbia County Chamber of Commerce</td>
<td>Alex Tardif, <a href="mailto:mgr@sccchamber.org">mgr@sccchamber.org</a>, 503-390685</td>
<td>Will identify potential developers or business interested in expansion or investment in project sites</td>
</tr>
<tr>
<td>Tillamook Small Business Center</td>
<td>Paul Nesbit, 503-842-8222, 1410</td>
<td>Will identify potential funding sources to move projects towards completion</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:paulnesbit@tillamookbaycc.edu">paulnesbit@tillamookbaycc.edu</a></td>
<td></td>
</tr>
<tr>
<td>Tillamook Chamber of Commerce</td>
<td>Justin Aufdermauer, 503-842-7525</td>
<td>Will identify potential developers or business interested in expansion or investment in project sites</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:justin@tillamookchamber.org">justin@tillamookchamber.org</a></td>
<td></td>
</tr>
</tbody>
</table>
business community, and one member representing area residents. As a required element of the selection process, borrowers and subgrantees must demonstrate that they meet the following criteria:

- Appropriate environmental assessment was complete by a qualified environmental professional;
- The borrower must be in good financial standing, current on property taxes and other obligations and must demonstrate the ability to repay the loan and complete the project successfully;
- A sub-grantee demonstrates the financial inability to complete the project on its own;
- The borrower/sub-grantee intends to redevelop the property for the uses described;
- The borrower/sub-grantee has secured RLF matching funds (20%) and the additional financing to complete the reuse/redevelopment project;
- The borrower/sub-grantee has the ability to facilitate the reuse of existing infrastructure;
- The project will meet state cleanup criteria; and
- The borrower must agree to meet all reporting requirements, such as conduct a public meeting with appropriate notification (to be defined in agreement) and present a draft ABCA (approved by EPA).

The criteria for selection will include the following: 1) application reviews of site eligibility and loan/subgrant applications, borrower financial information, remediation plans, and coordination with the ODEQ and EPA; 2) review and approval of applications for loans or subgrants funding to insure that criterion are met including due diligence for site eligibility, completeness of application documentation, 3) Committee members will also conduct site visits, review of environmental reports as well as cleanup plan approval. The Committee will vote to approve loans and grants. Loan documentation, such as preparation of agreements governing the legal and financial obligations of borrower or subgrantee for final closing of funding, will be reviewed by the Col Pac legal team.

3.a.ii. Revolution of the RLF Program: Col Pac will incorporate reasonable and prudent lending practices to encourage the funds to revolve. The RLF program will offer two products to potential developers, direct loans and subgrants. The main loan product will be a fixed-term loan with low-interest, between 0-5%, and will be made for projects where the developer has secured at least 50% of the estimated remediation funding required. Loan agreements will be structured with enough flexibility to maximize borrower success as well as ensure the sustainability of the RLF. Loan terms, interest rates, fees and duration will be based upon the borrower’s ability to service the debt. The loans will range in value between $50,000 and $500,000, and the terms will be between three and seven years. Borrower repayments will be scheduled on a monthly basis. Deferments and potentially, gap financing opportunities will be offered to borrowers with less access to capital or whose projects have substantial job creation potential in order to benefit the local population of economically-disadvantaged persons. Deferments of up to one year will be considered or adjusted on a case-by-case basis, and loan balances will be re-amortized within the remaining terms of the loan. Also a portion of loans to eligible entities may be discounted as a work completion incentive. Bridge loans will be considered where repayment takes place at the close of construction financing or when permanent financing is secured by the project developer. Subgrants may be awarded to public or non-profit borrowers after consideration of the borrower’s fiscal solvency and the nature of the project. In order to keep the loan funds successfully revolving and sustain the project after the cooperative agreement is closed, Col Pac will look to invigorate the fund from sources outside of the EPA, such as through USDA or the US Economic Development Administration. Keeping administrative costs to a minimum will enable the Col Pac to loan the maximum amount possible in order to reach project goals. By evaluating the fund in terms of effectiveness in reaching project goals and the sum of loans made, Col Pac will reach the project goals in a timely fashion or adjust marketing and outreach strategies as the project moves forward.

Deliverables will include a memo on market research, a financial policy manual, marketing information on loan products, subgrantee awards, and completed loans. The estimated completion date for the deliverables will vary. To provide EPA and other stakeholders with sufficient information on the progress and success of the RLF program, status/progress summary reports will be completed quarterly during the project performance period. A final performance report and closeout agreement will be
submitted to the EPA Project Officer within 90 calendar days after the expiration or termination of the award. The report will provide a summary of the project progress and milestones met or exceeded during the reporting period, fund expenditures and lessons learned, and their applicability during the remaining term of the project. Throughout the project period, Col Pac will report on the leveraging successes that result from this grant – not only successes in leveraging brownfield redevelopment dollars, but also success evidenced by improvements in clean air, clean water, smart growth, and environmental health. Reports will be made available via hard copies and electronically on the brownfield program website.

3.a.iii. Marketing Strategy: Col Pac has 30 years of combined staff experience attracting developers and industry: and regularly works in tandem with communities to establish and carry out economic development strategies and finance programs in the project area. Col Pac identified potential project sites and engaged stakeholders through a targeted series of community engagement meetings held in order to gauge interest and develop this application. Potential RLF sites and potential developers were identified, including the developers of recent projects in Portland, Oregon and Vancouver, Washington.

To market the RLF program, Col Pac will implement its tested and comprehensive outreach approach that includes the following on an ongoing or quarterly basis as applicable: 1) project website; 2) social media outlets (LinkedIn and YouTube); 3) one-to-one marketing; 4) group workshops and economic development conference(s) participation; 5) collaborative marketing through lenders; 6) advertising in local business media; 7) the Regional Solutions Team network and 8) subgrantee and developer training. In marketing the RLF to potential borrowers and subgrantees, Col Pac will consider: 1) compliance with federal brownfield laws; 2) site location; 3) past and current uses of the site; 4) proposed future use of the site; 5) current property owner’s disposition/willingness to sell and allow site access; 6) anticipated economic benefit to the community; 7) the likelihood for success encouraging additional nearby redevelopment, and; 8) the likelihood of brownfield redevelopment to mitigate risk to human health and the environment.

Col Pac with assistance from stakeholders and the QEP prioritize properties identified in the community engagement process outlined above. Col Pac will also target developers with experience working with both for-profit and non-profit organizations, with expertise in developing projects aligned with the community minded goals and objectives. Project staff have worked with and will continue to work with the target counties and communities; the OR Regional Solutions Team, area Chambers of Commerce, and Business Oregon to identify qualified developers. Program staff works closely with the real estate brokerage community, especially industrial and commercial brokers.

Col Pac will complete the development of marketing materials, such as an information brochure, web page, and social media content. These print and electronic tools will outline the loan process and the required loan procedures. Col Pac will hold initial RLF public meetings/open houses for interested property owners, developers and community-interest groups in each County to kick off the program following an initial promotions blitz. Most importantly, staff will follow up with property owners, businesses, and nonprofits that are identified through this process as controlling brownfield sites. Property owners will be contacted individually about the availability of cleanup funds, to answer questions and engage them.

3.b. i.-iv. Description of Tasks/Activities and Outputs

<table>
<thead>
<tr>
<th>Task/Activity 1: Community Engagement and Fund Marketing</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Project Implementation - EPA-funded activities for the priority sites: This task includes the creation of a written CIP plan to be submitted to EPA. At a minimum, five public engagement meetings held in the target area over the course of the five-year program. The program staff will also attend economic development conferences as appropriate to market the program. Marketing materials will be generated and distributed.</td>
</tr>
<tr>
<td>EPA-funded activities for non-priority site(s): In addition to the activities listed above, additional site selection will be based on public input and through marketing efforts.</td>
</tr>
<tr>
<td>Non-EPA grant resources needed: in-kind resources –time and effort of local and community partners to reach potential participants and stakeholders.</td>
</tr>
</tbody>
</table>
### Task/Activity 2: Fund Management

**i. Project Implementation** - EPA-funded activities for the priority sites: 1) establish the revolving loan fund, and 2) management and capitalization of the fund. Subtask 1 involves the following activities to establish the RLF: 1) conduct market research, define the project, develop a financial policy manual, identify potential borrowers, leverage funds from other sources; and determine various loan structures to the project market needs, 2) product and program development through definition of the program structure, determine staffing needs, develop loan products and determine the technical services offered to the project market.

**EPA-funded activities for non-priority site(s):** identical work will be completed at sites that are identified in the public engagement and through fund marketing processes.

**Non-EPA grant resources needed:** in-kind resources: Col Pac Board effort

**ii. Anticipated Project Schedule:** Months 1 through 60;

**iii. Task/Activity Lead(s):** Financial Director/Fund Manager with support from administrative personnel, Legal Counsel and Col Pac Board, as needed.

**iv. Output(s):** financial policy manual; financial statements and reporting, loan applications, grant applications, loan agreements; grant agreements; disbursements of funds.

### Task/Activity 3: Cleanup Oversight

**i. Project Implementation** - EPA-funded activities for the priority site(s): Col Pac will ensure, through measurable benchmarks, timeframes, and reporting, that borrowers and subgrantees obtain access, develop ABCAs and H&S Plans, and conduct cleanups that comply with appropriate regulatory requirements and address community concerns. Hazardous waste sites will be remediated under authority of the Georgia Hazardous Site Reuse and Redevelopment Act – Amended 2002, and as appropriate, the Brownfields Tax Incentive Law - Enacted 2003. The QEP will provide cleanup oversight, the City and QEP will ensure the eligibility of sites, eligibility of borrowers (e.g. not a responsible party) and subgrantees and that all cleanups are protective of human health and environment.

**Discussion of EPA-funded activities for non-priority site(s):** Same as above.

**Non-EPA grant resources needed:** matching funds from borrowers/sub-grantee (20%).

**ii. Anticipated Project Schedule:** Months 4 through 57.

**iii. Task/Activity Lead(s):** QEP and Technical Coordinator with support from project staff.

**iv. Output(s):** ABCAs, Health and safety plans, Cleanup activities; Cleanup decision documents; reporting.

### Task/Activity 4: Programmatic Support

**i. Project Implementation:** A project management system will be put into place by Col Pac and QEP to provide USEPA and other stakeholders with sufficient information on the progress and success of the region's brownfield redevelopment program; status/progress summary reports will be completed quarterly during the project performance period. A final report will be submitted at the conclusion of the funding period. The reports will provide a summary of the project progress and milestones met or exceeded during the reporting period, fund expenditures and lessons learned, and their applicability during the remaining term of the project. Throughout the project period, Col Pac will report on the leveraging successes that result from this project, not only successes in leveraging brownfield redevelopment dollars but also success evidenced by improvements in air, water, smart growth, and environmental health.

**Discussion of EPA-funded activities for the priority and non-priority site(s):**; attending a minimum of three EPA (or state brownfields) training and conferences (regional or national); cooperative agreement oversight; team meetings. **Non-EPA grant resources needed:** QEP procurement process; recipient reports.

**ii. Anticipated Project Schedule:** Months 1-60.

**iii. Task/Activity Lead(s):** Programmatic coordinator with support from QEP and project staff.

**iv. Output(s):** Training attendance; quarterly reports, ACRES data entry, team meeting notes, public records.

### 3.c. Cost Estimates

**Task 1 Costs:** Community Engagement and Fund Marketing - $25,000 printing; media placements, promotional items; $45,000 Contractual services to support developer outreach, site selection and
marketing as described above (450 hours at $100 per hour over five years); $5,000 (set fee) community involvement plan; $10,000 to support Col Pac staff time for community engagement efforts such as meeting planning and coordination over the five-year project **Task 1 total $85,000**

**Task 2 Costs: Fund Management** - $600,000 in loan funds; $290,000 in Subgrant funds. $30,000 Legal services fees(approximately 300 hours at $100 per hour over five years) – will be dependent on the number of loans and agreements to be reviewed and processed, any remaining funds will be moved into cleanup or programmatic costs at the start of year 5, as applicable.. $50,000 to support Col Pac staff time in fund management, such as financial oversight, coordinating and conducting application review, and tasks related to revolving loan funds. **Task 2 total $970,000**

**Task 3 Site Cleanup and Oversight Costs:** -$75,000 QEP contractual services as described above (750 hours at $100 per hour over five years). $10,000 to support Col Pac staff time in the oversight of the QEP and reviewing of technical reports. **Task 3 total $85,000**

**Task 4 Programmatic Costs:** $5,000 for one staff member to attend at least three EPA national or regional/state conferences/training. Approximate costs cover the five-year project and are based on previous travel costs: registrations-$800; mileage or air travel-$1,400 (3 flights); hotel X 8 nights ($150 per night)-$1,200; $75 per diem X 8days-$600; $1,000 in remaining travel funds would allow for Col Pac staff to travel to regional meetings with project communities; $40,000 in QEP services as described above (400 hours at $100 per hour over five years). $10,000 to support Col Pac staff time for program efforts, such as quarterly report review, staff/QEP team meetings. $5,000 in supplies include office supplies and meeting items. **Task 4 total $60,000**

<table>
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<tr>
<th>Budget Category</th>
<th>Task 1</th>
<th>Task 2</th>
<th>Task 3</th>
<th>Task 4</th>
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<tr>
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<td>Total Budget</td>
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<td>$1,200,000</td>
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**3.d. Measuring Environmental Results:** The Project Director will be responsible, with support of the QEP, for tracking, measuring, and evaluating progress towards environmental results through measurable outcomes and outputs. A spreadsheet of benchmarks, milestones, expected outputs and outcomes will be maintained and updated quarterly, and environmental outputs will also be recorded in the ACRES database. Cleanup and redevelopment resulting from RLF activities will be reported in quarterly reports to the EPA. In addition, environmental results will be reported to the community during public meetings throughout the RLF program. Anticipated outputs include community meetings held, loans and subgrants, ACRES entries, and cleanup plans created/cleanups completed. Quarterly reports to EPA, annual FFR and MBE/WBE forms, and closeout reporting will also be outputs. Anticipated outcomes include number of: attendees at community meetings/events, sites/acres able to be marketed with understanding environmental conditions, sites made available for reuse, jobs created, dollars leveraged, contaminant concentrations reduced, acres of green space created and sites redeveloped. Qualitative measures of long-term community education and overall improvement of quality of life will be measured against timeliness and community satisfaction. Measures of performance will need be placed on loan recipients for cleanup activities, such as timeliness of repayment, adherence to project timeline and loan agreement terms.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

**4.a.i. Organizational Capacity, and iii. Description of Key Staff:** The Col Pac project team are experienced in loan programs, economic redevelopment program planning and implementation.
Project Director: Sarah Lu Heath will serve as Project Director for the proposed RLF grant. Sarah Lu has 13 years of experience in developing and managing projects, overseeing budgets and finances, community outreach and working alongside local governments on community development, planning, economic development, and grant writing. Sarah Lu will oversee the day-to-day operation of the grant, programmatic requirements, community outreach and marketing the fund. Finance/Loan Fund Manager: Ayreann Colombo, Col Pac’s Executive Director, will serve as finance director/fund manager for the proposed RLF grant. Ayreann is the current financial manager overseeing two USDA Revolving Loan Funds for the organization and well versed in federal governmental reporting requirements. Ayreann has a Master’s degree in Economics and over 15 years of experience in finance, business and community planning and economic development. Technical Coordinator (review project reports): Lydia Ivanovic will serve as technical coordinator for the proposed RLF grant and will oversee the environmental contractor and technical brownfields activity. Lydia has over a year of background in administering the environmental review and labor standards for Community Development Block Grant construction projects in the Col Pac region.

4.a.ii. Organizational Structure, The project staff team identified below report to the Executive Director who in turn reports to the Col Pac board of directors. The board is comprised of members representing counties and communities within the Col Pac service area. The project team will update the board at monthly meetings. Board members also populate the loan/grant selection committee that will review applications and make decisions on awards, which will be presented for final board approval. In addition, Col Pac retains legal counsel to review all contracts and agreements that is experienced in real estate and land use including development, investment, sales, and construction for sites across the state and region and are highly experienced in dispute resolution that can eliminate lengthy legal proceedings.

4.a.iv. Acquiring Additional Resources: Col Pac has procured additional resources (QEP) through a competitive bid process, which included a request for qualifications, mandatory pre-bid meeting and bid opening in compliance with the Federal Procurement Standards 2 CFR. 200.317/318. The QEP team that includes DBE subcontractors was selected based on qualifications and experience. This same procedure would be implemented if additional assistance is required.

4.b. Past Performance and Accomplishments

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal Assistance

(1) Purpose and Accomplishments:

<table>
<thead>
<tr>
<th>Grant</th>
<th>Award Amount</th>
<th>Purpose</th>
<th>Accomplishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY20-21 CARES Act COVID Small Business</td>
<td>$2.67 million</td>
<td>Preserve small business through awarding subgrants</td>
<td>Managed federal funds and awarded over 400 grants to small businesses throughout Col Pac region.</td>
</tr>
<tr>
<td>USDA Revolving Loan Fund</td>
<td>$2.46 million (award plus three recapitalizations)</td>
<td>Rural small business loans</td>
<td>$4,899,000 in loans disbursed since 2003 to over 40 small businesses.</td>
</tr>
<tr>
<td>FY20 USDA Regional Food System Partnership Grant</td>
<td>$450,000</td>
<td>Managed on behalf of partnership of food system producers and support organizations.</td>
<td>Funding organizations/ producers who are facilitate training services, logistics/delivery services and aggregation in two counties.</td>
</tr>
</tbody>
</table>

(2) Compliance with Grant Requirements: Col Pac project staff have a history of timely compliance with all federal and state grants under Col Pac control. The organization monitors progress and conducts annual audits as needed. As stated, no adverse audit findings have been determined, and the Federal projects above were completed successfully without any corrective measures and in compliance with all work plans. All terms and conditions of the awarding agencies were met on schedule. Reports and financials have been submitted in a timely manner.
Columbia Pacific Economic Development District, Oregon  
FY22 EPA Brownfields Revolving Loan Fund - Threshold Criteria

1. **Applicant Eligibility**
Columbia Pacific Economic Development District is a nonprofit organization with tax-exempt status under section 501(c)(3) of the Internal Revenue Code. The organization is certified by the U.S. Economic Development Administration (EDA) as a designated Economic Development District.

*Documentation of Applicant Eligibility*
See attached documentation from IRS attached.

2. **Demonstration of Previous RLF Grant Status**
Not applicable. Columbia Pacific Economic Development District does not have a current EPA grant.

3. **Expenditure of Existing Multipurpose Grant Funds**
Not applicable. Columbia Pacific Economic Development District does not have a current EPA grant.

4. **Description of RLF Boundaries**

5. **Oversight Structure and Legal Authority to Manage a Revolving Loan Fund**
   
a. **Cleanup oversight:** Columbia Pacific Economic Development District will consult with EPA and the Oregon Department of Environmental Quality (ODEQ) to ensure cleanup/remediation/abatement activities are protective of human health and the environment. Columbia Pacific Economic Development District will utilize technical expertise from a qualified environmental professional (QEP) through competitive procurement provisions of 2 CFR §§ 200.317 through 200.327 that will include a request for qualifications, pre-bid meeting and bid opening. A QEP has been selected based on qualifications and experience. The process has been initiated to ensure that this technical expertise will be in place prior to issuance of the RLF Cooperative Agreement, as well in advance of initiation of cleanup activities.

   b. **Legal opinion from counsel:** Columbia Pacific Economic Development District has the legal authority to access and secure sites in case of default or non-performance and to revolve the loan fund. *See attached legal opinion.*

6. **Statutory Cost Share**
   
a. The cost share for the proposed project will be in the form of a contribution of labor, material, or services from a non-federal source, such as in-kind effort of volunteers as well as from loan applicants or subgrant awardees. The cost share in-kind services or donations of goods and services will be eligible and allowable expense under the grant and in compliance with 2 CFR § 200.306. Further, financial and in-kind contributions from non-profit sub-grantees and loan applicants will be documented as cost share.

   b. No cost share waiver is being requested.
7. **Named Contractors and Subrecipients (other than borrowers and site cleanup subgrantees)**

Not Applicable - no contractors or sub-recipients are named in this application. Columbia Pacific Economic Development District pledges full compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500 in the selection of all consultants and contractors.