

**Oregon Metro - FY2024 US EPA Brownfield Assessment Coalition Grant Application
 Narrative Information Sheet**

R10-24-A-005

1. Applicant Identification:

Oregon Metro
 600 NE Grand Avenue
 Portland, Oregon 97232-2736

2. Funding Requested:

- (a) Assessment Grant Type: Assessment Coalition
- (b) Federal Funds Requested: \$1,500,000

3. Location:

- (a) City: The Coalition’s Target Areas are linear corridors that include portions of multiple cities and unincorporated areas of Washington, Clackamas, and Multnomah Counties. The high priority brownfields identified in the grant application are located in the City of Tigard (Washington County), City of Cornelius (Washington County), unincorporated Clackamas County, and the City of Portland (Multnomah County). The Coalition will select additional brownfields throughout the Target Areas, and potentially the broader Metro area, for grant assistance with brownfield revitalization.
- (b) County: Clackamas, Multnomah, and Washington Counties
- (c) State or Reservation: State of Oregon

4. Coalition Members Target Areas and Priority Site Information:

Census tracts of the Coalition’s four Target Areas are presented below along with the priority site addresses (or tax lots for properties without addresses) in each area.

<p>Coalition Lead: Metro</p> <p>Target Area: 82nd Ave Corridor</p> <p>Census Tracts*: 41051000601, 41051000602, 41051001602, 41051002903, 41051008301,</p> <p>Priority Site Addresses: 333 and 322 SE 82nd Avenue, Portland, OR 97216</p>	<p>Non-Lead Member: Washington County</p> <p>Target Area: TV Highway Corridor</p> <p>Census Tracts*: 41067030401, 41067031100, 41067031201, 41067031202, 41067031301, 41067031302, 41067031402, 41067031606, 41067031615, 41067031623, 41067031624, 41067031703, 41067031705, 41067031706, 41067032302, 41067032410, 41067032412, 41067032501, 41067032502, 41067032503, 41067032604, 41067032901, 41067032903, 41067032904, 41067033101, 41067033201, 41067033202, 41067033301, 41067033302</p> <p>Priority Site Address: 1021 Baseline Road, Cornelius, OR 97113</p>
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<p>Non-Lead Member: Clackamas County</p> <p>Target Area: Sunrise Corridor</p> <p>Census Tracts*: 41005022105, 41005022107, 41005022108, 41005022109, 41005022110, 41005023202</p> <p>Priority Site Addresses: 10050-10960 SE Jennifer Street, Clackamas, OR 97015</p>	<p>Non-Lead Member: Unite Oregon</p> <p>Target Area: Southwest Corridor</p> <p>Census Tracts*: 41005020302, 41005020304, 41005020401, 41051006200, 41051006402, 41051006403, 41051006404, 41051006501, 41051006502, 41051006602, 41067030600, 41067030700, 41067030806, 41067032005</p> <p>Priority Sites: No street address, tax lots: 2S101BA00300, 2S101AB00101, 2S101AB00200 (Lat/Long: 45.43227247117731, -122.75160028695466)</p>
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5. Contacts:

(a) Project Director:

Brian Harper, Metro Senior Regional Planner
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 600 NE Grand Avenue, Portland, Oregon 97232-2736

(b) Chief Executive/Highest Ranking Elected Official:

Lynn Peterson, Chief Operating Officer
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 600 NE Grand Avenue, Portland, Oregon 97232-2736

6. Population of priority site locations:

Target Area	Target Area City/County	Population
82 nd Ave Corridor Priority Site	City of Portland	619,286
	Multnomah County	803,377
Southwest Corridor Priority Site	City of Tigard	55,767
	Washington County	600,811
TV Highway Corridor Priority Site	City of Cornelius	13,416
	Washington County	600,811
Sunrise Corridor Priority Site	Unincorporated area: Clackamas	6,965
	Clackamas County	422,537

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7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
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).	Page 2
The priority brownfield site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Page 3
The reuse of the priority site(s) will incorporate energy efficiency measures.	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Pages 4, 8
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B, for priority sites within the target areas.	Pages 10, 11
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority: A letter of acknowledgement from the Oregon Department of Environmental Quality is attached.



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

November 6, 2023

via electronic delivery

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

Re: DEQ Support – Metro’s Coalition Application for an EPA Community-Wide Brownfield Assessment Grant

Terri:

The Oregon Department of Environmental Quality (DEQ) supports the Oregon Metro Coalition’s application for a community-wide brownfield assessment grant. The Coalition includes Metro, the counties of Multnomah, Clackamas, and Washington, and Unite Oregon, a BIPOC-led non-profit focused on ensuring community voices and interests are involved in decision-making.

If awarded the grant, the coalition plans to conduct site investigations within four target areas that are located within the Metro-designated Equity Focus Area¹. According to a Metro survey, there are approximately 1,500 brownfields within the four target areas. These brownfields include former gas stations, dry cleaners, and former manufacturing facilities, all of which may pose a risk to human health and the environment and/or impede redevelopment.

The Coalition’s proposed approach to addressing brownfields acknowledges the unjust planning and development policies that have and continue to harm vulnerable and underserved communities. Prioritizing the work in these areas in parallel with community-led and centered revitalization plans will begin the work of creating healthy, sustainable, and equitable communities.

For many years, DEQ’s Cleanup and Tanks Programs have worked in collaboration with brownfield partners in the Metro region to ensure redevelopment is protective for people and wildlife. DEQ appreciates the Metro Coalition partners commitment to community engagement and brownfield redevelopment. As a result, DEQ is pleased to support this grant application. Please contact Kara Master, DEQ Northwest Region Brownfields Coordinator, at 503-229-5585 if you have any questions.

Sincerely,

Christine Svetkovich

Christine Svetkovich (she/her)
Northwest Region Administrator

¹ The Equity Focus Area is defined as areas with low incomes and/or with a proportion of people of color or people with limited English proficiency greater than the regional average.

ecc: Kara Master, NWR Brownfield Coordinator
Rebecca Wells-Albers, HQ Brownfields Coordinator
Paul Seidel, NWR Cleanup Program Manager
Kevin Parrett, NWR Cleanup Program Manager
Peter Donahower, Petroleum Cleanup Section Manager
Margaret Olson, EPA R10 Project Officer

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION: 1.a. Coalition Members, TA &

Brownfields: 1.a.i. Coalition Members: Metro is the regional planning agency serving the 463-square-mile Portland, Oregon Metropolitan Area (Metro Area) and is the lead for this US Environmental Protection Agency (EPA) Brownfield Coalition Grant. Non-lead Coalition members are two Metro Area counties, Washington and Clackamas, and the 501(c)3 community-based organization (CBO) Unite Oregon. Unite Oregon is led by people of color, immigrants and refugees, rural communities, and people experiencing poverty and is focused on social and environmental justice. Metro is working with these partners to develop and implement Equitable Development Strategies in four target areas (TAs), each located within a Metro designated Equity Focus Area, as described in Section 1.a.ii.

The Coalition partners lack the staff and budgets to apply for and manage their own grants due to historic pressure to address growth, housing, homelessness, and a regional addiction crisis. Coalition partners are directing resources to managing rapid growth and housing cost inflation in several “zoom towns” booming with remote workers relocating since the start of the COVID pandemic. Property tax revenues to cover housing and homelessness prevention programs are not keeping up with growth due to a 3% limit on tax increases passed in the 1990s. Resources are also needed to address the region’s urgent addiction crisis. Oregon (especially the Metro area) has one of the highest addiction rates in the US^a and the 2020 Oregon legislature has diverted millions in tax revenue from county budgets to addiction services. Both counties are facing budget shortfalls that limit their ability to hire staff to apply for and manage a brownfield grant. Washington County faced a \$25M 2023 budget shortfall despite enacting a hiring freeze. Clackamas County is cutting staff to cover a \$15M shortfall. Nonprofit Coalition partner, Unite Oregon, relies on grants and donor contributions to fund its work.

1.a.ii. Overview of Brownfield Challenges & Description of TAs: The Coalition will address brownfields in the Metro Area (Multnomah, Clackamas, and Washington Counties) with a focus on four TAs described below. Regulatory records show thousands of vacant or underutilized parcels with environmental agency database listings in the Metro Area, with around 1,500 in the four TAs. Many Metro Area brownfield challenges stem from past unjust planning and development practices that drove low-income communities and people of color from the gentrifying core. This spawned less dense, auto-oriented corridors that have received less investment and thoughtful planning and have therefore been less resilient to the effects of economic downturns, including a proliferation of brownfields. Regional brownfield challenges are concentrated in these areas, including former gas stations and auto sales and repair businesses, vacant lots and aging and underused retail spaces and office buildings, and derelict warehouses and small manufacturing facilities. This grant will help redress past injustices by encouraging brownfield infill redevelopment to promote transit-oriented development and walkability, prepare sites for new businesses and jobs, amenities, and services, and reduce threats to the health and welfare of the underserved TA residents while stabilizing neighborhoods to prevent displacement.

The Coalition has prioritized the four heavily auto-oriented TA corridors for livability and transit investments that will help address a legacy of unjust development, present-day environmental justice and livability challenges, and disproportionate brownfield impacts. Each of the TAs is within a Metro-designated Equity Focus Area, defined as areas with low incomes and/or with a proportion of people of color or people with limited English proficiency greater than the regional average: **82nd Avenue Corridor** (Metro TA): This 6-mile arterial in east Portland is bound by Sandy Blvd to the north and Clatsop Street to the south. It is one of the region’s busiest high-crash corridors and includes some of the most diverse and historically underserved neighborhoods in the Metro Area. The **Tualatin Valley Highway (TV Hwy) Corridor** (Washington County TA, 10-mile corridor serving urban and rural town centers in Beaverton, Aloha, Hillsboro, Cornelius, and Forest Grove in the western Metro Area) and the **Sunrise Corridor** (Clackamas County TA: 4-mile corridor from US Hwy 205 to SE 172nd Ave in the southeastern Metro Area) are two of the busiest freight and commuter corridors and fastest growing residential areas in the region with thousands of underserved residents in need of workforce housing and improved air quality. **Southwest Corridor (SW Corridor)** (Unite Oregon TA): This 6-mile stretch of State Hwy 99W from Portland to Tigard in the southwest Metro Area touches each Metro Area county and is one of the region’s highest growth

^a [2020 National Survey on Drug Use and Health](#)

areas. This corridor has historically been perceived as an area of greater wealth and lower diversity, but Metro's studies have found that immigrant and refugee communities are prevalent and expanding.

Metro is working with the TA communities on transit and livability investments to build economically viable, healthy, complete neighborhoods while stabilizing existing communities to prevent displacement. Brownfields are a roadblock to these efforts. This grant will allow these communities to transform vacant, blighted brownfields into dense, in-fill, transit-oriented development that promotes livability and economic vitality. It will help to mitigate the environmental justice and health and welfare issues these communities are facing, including disproportionate exposure to brownfield contaminants, heat islands, poor air quality and safety hazards from heavy traffic, poverty, and a lack of affordable housing.

1.a.iii. Description of the Priority Brownfield Sites: Regulatory records show around 1,500 potential brownfields within the four TAs. Due to the auto-oriented nature of the TAs, many brownfields have histories of auto fueling and repair. Each corridor has many vacant lots; underused retail spaces and office buildings; and idle warehouses and manufacturing shops. There is also a legacy of past industrial uses--a vacant former landfill is located in the 82nd Avenue TA and a former wood products mill is located on TV Hwy. Many of these brownfields have histories of hazardous waste generation and petroleum storage and distribution. Brownfields are located very close to underserved residential neighborhoods that adjoin the TAs. The Coalition has identified priority brownfields in each TA.

82nd Ave: Two brownfields across 82nd Ave from each other total 1.5 acres of vacant and underutilized land and prioritized due to their deteriorating conditions, proximity to historically underserved neighborhoods that may be impacted by contamination originating from these sites, and potential for reuse to alleviate the regional housing shortage. One site is a vacant former RV sales lot—a large, paved lot with an aging, neglected building built in the 1960s. Multnomah County has taken ownership to steward the site to productive use. Across the street is a row of vacant lots historically used for vehicle storage and maintenance. Assessment is needed to evaluate suspected contaminants including petroleum, metals, and solvents from past auto-related uses.

TV Hwy: A former gas station in the small City of Cornelius (pop. 13,146) is a priority as it is blighting a busy intersection in Cornelius' envisioned Town Center and is adjacent to a neighborhood that may be at risk of petroleum vapor intrusion from this site. The site has been vacant since 2016 but the gas station pumps and canopy remain in the weed-lined asphalt lot. Oregon Department of Environmental Quality (DEQ) records show that five underground storage tanks are still in place. Limited environmental sampling has been conducted and has identified diesel and gasoline in soil and groundwater.

Sunrise Corridor: A 35-acre gravel quarry site in the unincorporated community of Clackamas is planning to shut down operations. It is a priority due to its large size and suitability for development to create family wage jobs and expand services to people experiencing homelessness. The quarry began operations in 1970 with an anticipated closure in 2025. Developers have shown interest in the site but concerns about contaminants in fill brought onto the site, petroleum impacts from heavy equipment use, and an adjacent former chrome plating facility--in addition to the challenging geotechnical and topographic conditions—are dampening interest. The site is located adjacent to the Clackamas River, and to Veteran's Village, and transitional shelter community for veterans.

SW Corridor: Over 5 acres of adjacent vacant lots (no structures) in a mixed commercial/residential area known as the Tigard Triangle are priorities due to their potential for reuse that alleviates a local lack of affordable housing and open space. Past agricultural and residential uses are known, but assessment is needed to understand all past uses. Suspected contaminants include agricultural pesticides as well as asbestos, lead paint, and heating oil from past residences.

1.a.iv. Identifying Additional Sites: Metro has identified Equity Focus Areas throughout the Coalition's boundaries for focused revitalization. The criteria used to define Equity Focus Areas are: 1) populations with low incomes (\leq 200% of the Federal Poverty Level), and/or 2) a proportion of people of color or people with limited English proficiency greater than the regional average. These Equity Focus Areas include and extend beyond the TA corridors. Sites outside the TAs but within the Equity Focus Areas will be prioritized for grant assistance if funding remains after TA sites are addressed. The Coalition will create a geographic information systems (GIS) inventory of Equity Focus Area brownfields and prioritize sites using criteria such as vacancy/underutilization, known/suspected contamination, nearby sensitive

uses (e.g., residential areas, schools), transit-oriented development opportunities, reuse that incorporates climate resiliency measures, and reuse plans that stabilize existing communities (e.g., affordable housing and jobs). The Coalition will jointly develop the final prioritization criteria.

1.b. Revitalization of the TAs: 1.b.i. Reuse Strategy & Alignment with Revitalization Plans: Reuse strategies for the priority sites are based on goals identified by the TA communities through planning and engagement efforts undertaken to support several revitalization plans. For example, brownfield reuse aligns with planned transit enhancements in the TAs outlined in the **2023 Regional Transportation Plan**: a new Bus Rapid Transit system on the 82nd Ave and TV Hwy corridors, light rail expansion in the SW Corridor, and safety and congestion improvements in the Sunrise Corridor. The TA reuse strategies align with and support the community-led **Equitable Development Strategies (EDS)** being prepared/implemented by each Coalition partner to stabilize neighborhoods and prevent displacement as enhancements occur (Section 3b).

SW Corridor Priority Sites: The reuse strategy for SW corridor sites is a mix of affordable housing and commercial use to meet needs for housing options, services, outdoor amenities, and job opportunities. This aligns with the **Tigard Triangle Strategic Plan**—a community-driven plan that resulted in code changes to promote walkability, greenspaces, streetscape enhancements, and designation of a Tax Increment Financing District to promote new housing and infrastructure upgrades. It also aligns with the **SW Corridor Shared Investment Strategy** and **Equitable Development Strategy** which present community-led visions for transit and development projects in the corridor that highlights brownfield reuse as a critical strategic investment and lay out anti-displacement strategies.

82nd Ave Priority Sites: Located adjacent to residential neighborhoods and in a food desert^b, this cluster of sites is zoned commercial and would be ideal for a food coop or small grocery store to bring fresh food to the area. There is also the potential for affordable multi-family housing on the western side of the site adjacent to existing residences, and office/retail space on the western side to facilitate job creation and local business opportunities. This plan aligns with the **Building a Better 82nd** planning initiative launched in 2022 as a series of community listening sessions to identify needs and investment opportunities. It also aligns with the **82nd Ave Transit Project**, a community-led plan to support local business and community stabilization efforts as transit investments are made. This effort spawned the **82nd Avenue Coalition**, a team of people and organizations who live, work and play along 82nd Ave that is partnering with Metro, Portland, and Clackamas County to develop the **EDS** for the corridor.

TV Hwy Priority Site: This site is in the designated Cornelius Town Center Core—the original heart of downtown prioritized for investment in the **Cornelius Town Center Plan**. During development of the plan, the community voiced a need for more dense development in this area with housing, childcare, and healthcare. This priority site is zoned commercial, and redevelopment could meet childcare and healthcare needs. Its reuse will also catalyze investment on adjacent vacant lots zoned for multi-family residential use to expand affordable housing. Brownfield revitalization aligns with the **TV Highway Transit Project** that outlines planning and design for transit improvements to reduce congestion and air pollution and promote transit-oriented development. As part of the transit planning the **TV Highway Equity Coalition** comprised of community and service organizations was convened to write the **EDS** to ensure development is community centered (Section 3b).

Sunrise Corridor Priority Site: This 35-acre site is an opportunity for industrial/commercial campus reuse bringing family wage jobs to the area. There is also an opportunity to expand services to people at risk of homelessness. The site is adjacent to Veteran's Village—transitional housing for homeless veterans. These strategies align with initiation of the **Sunrise Corridor Community Visioning** process kicked off in 2023 by Clackamas County, Metro, and local stakeholders. The visioning approach was designed based on 2+ years of community engagement, and will focus on economic development, land use, mobility, health, and anti-displacement. It also aligns with incentives approved by Clackamas County to encourage affordable housing development in unincorporated areas like the high priority brownfield location.

1.b.ii. Outcomes & Benefits of Reuse Strategy: Revitalization of TA brownfields will stimulate economic development by increasing density, supporting new businesses with living wage jobs, alleviating housing

^b USDA Food Research Atlas: site is in area where 33% of people live >0.5 miles from a supermarket

cost burdens, and returning properties to the tax rolls. Cleaning up TA brownfields will free up the sites for **new businesses and jobs**. For example, at an assumed density 600 sq ft/job, the 1.5M sq ft Sunrise Corridor priority site could house 250 new jobs.^c This site also presents an opportunity to serve populations at risk of homelessness. The adjacent Veteran's Village is a 1-acre site with 15 one-person housing shelters and kitchen and bath facilities. At the same density as Veteran's Village, just 10% of this priority site could hold another 40 transitional shelters and support services.

Stimulating creation of **affordable housing** is critical to economic development as more than half of TA households do not earn a Metro Area living wage and more than half of TA residents spend >30% of their income on housing (Section 2.a.i). Brownfield redevelopment will aid in alleviating this economic burden. A property adjoining the TV Hwy priority site was recently developed with 124 units of multifamily housing per acre of land. Based on this density, the 5-acre TV Hwy priority brownfield could support 622 new housing units once the brownfield is cleaned up. This development could also incorporate an **open space** component to alleviate this area's lack of parks.

Preparing brownfields for more productive use will improve tax revenues to be reinvested in these communities. The low taxable value of brownfield sites is impacting **tax revenues**. Multnomah County had to take ownership of the vacant 82nd Ave priority site, so it is no longer on the tax rolls. Even prior to public ownership, the run-down site improvements were valued at just \$10,000, compared to a similar sized retail development two blocks north on 82nd with a taxable improvement value of \$2.5M.

The Coalition's plans for this grant will **improve local climate resilience** by supporting in-fill, transit-oriented development that promotes walkability, allows residents to stay local for work, services, and amenities, and reduces reliance on single-occupant vehicles. These brownfield reuse strategies will reduce traffic in the TA corridors, along with greenhouse gas emissions, air pollution, and heat island effects. The plans align with and will magnify the impacts of several local climate initiatives. For example, the 2023 City of Portland Climate Investment Plan has targeted 82nd Ave for \$2.2M in funding for green/climate infrastructure projects such as urban tree canopy expansion, bioswales, de-paving, and carbon sequestration. The bus fleet serving the TAs already includes zero emission buses and the planned bus-rapid transit expansion has committed to a fully zero emissions fleet by 2040. Reuse of TA brownfields combined with these investments will sustainably accommodate the fast-growing TAs and alleviate pressure to sprawl into the surrounding greenspaces.

1.c. Strategy for Leveraging Resources: 1.c.i. Resources Needed for Site Reuse: The Coalition partners are eligible for federal, state, and other funding that can support reuse of the priority sites. This grant will act as a catalyst for securing additional funds. The Business Oregon brownfield program offers brownfield grants and loans (some that are forgivable) to public and private sector applicants for brownfield assessment, cleanup, and reuse planning that will provide a community benefiting reuse. DEQ also provides funding for brownfield assessment and cleanup. The Columbia Pacific Economic Development District has a brownfield revolving loan fund that Washington County can access for cleanup funding. The Coalition can also pursue EPA Brownfield Grants for assessment, cleanup, and planning and take advantage of the EPA Targeted Brownfield Assessment program as needed. The Coalition can also reach out to local organizations including the Oregon Community Foundation (OCF), a \$20M endowment funding affordable housing and livability projects.

The grant will stimulate the availability of additional funding and private investment in brownfield redevelopment with affordable housing by leveraging: 1) state *Local Innovation and Fast Track (LIFT)* funds, 2) state *Multi-Family Energy Program* incentives to build energy efficiency into affordable housing, 3) *Oregon Health Authority* funding for housing that includes mental health case management/treatment, 4) *Affordable Housing Tax Credits*, 5) *HOME Investment Partnership* programs in Washington and Clackamas Counties funded through the US Dept. of Housing and Urban Development (HUD); and 6) *Metro's Affordable Housing Bond* and *TOD Program* make funds available to acquire property and develop affordable housing and TOD.

Beyond affordable housing, this grant will leverage resources for sustainable and equitable brownfield redevelopment: 1) *Metro Planning and Development Grants* that fund brownfield reuse and equitable development strategies; 2) Enterprise Zones to incentivize new business investments; 3) OR law allows

^c Metropolitan Council Local Planning Handbook metrocouncil.org

local governments to provide property tax exemptions of up to 75% of high-priority brownfield site cleanup costs; 4) Portland offers Percent for Green grants for large-scale green infrastructure projects; 5) the OR Department of Land Conservation and Development has multiple grant offerings that align with brownfield revitalization initiatives; and 6) the State of Oregon Main Street Program, which offers grants of up to \$200K to facilitate downtown revitalization that will lead to private investment.

1.c.ii. Use of Existing Infrastructure: The TAs are highly developed and well-served by existing infrastructure (transit, water, sewer, electric, natural gas, etc.). Use of the TAs’ existing infrastructure will be an inherent benefit of the Brownfield Grant project. This project’s focus on serving existing developed communities will reduce the need to expand regional roads, water lines, electrical services, and sewer lines to service sprawled development. Brownfield revitalization in these corridors will tie into investments in the existing transit system, keeping development compact and keeping taxpayer-funded infrastructure expansion and maintenance costs down. The Coalition also anticipates using the EPA brownfield grant funds for assessments of asbestos and lead paint, supporting adaptive reuse of existing buildings.

Additional infrastructure needs are not anticipated for reuse plans. However, if needed, Oregon and the state Regional Solutions Program can assist with infrastructure funding to support brownfield reuse. Regional Solutions provides funds for construction projects through the Regional Infrastructure Fund (RIF). Business Oregon provides access to funding and technical assistance through programs like the Special Public Works Fund that can be used for building and infrastructure projects.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT: 2.a. Community Need: 2.a.i. The Community’s Need for Funding: This grant will meet the needs of some of the lowest-income communities in the Metro Area by supporting in-fill brownfield redevelopment to help transform heavily trafficked auto-oriented corridors into walkable, densely developed, economically vibrant and stable neighborhoods. Brownfield redevelopment has a major role to play in alleviating the health and welfare threats discussed in Section 2.a.ii. TA communities are unable to draw on other initial sources of funding for assessment, cleanup, and reuse due to low incomes and the area’s extremely high cost of living.

The Coalition has prioritized the TAs specifically because of their low incomes. Each TA is within a Metro designated Equity Focus Area, where the proportion of people with low incomes and/or people of color or people with limited English proficiency is greater than the regional average. Additionally, the density (persons per acre) of one or more of these populations must be double the regional average to be deemed an Equity Focus Area.

The high cost of living in the Metro Area subjects many households to economic stress, even if household income is above the federal poverty level (\$30K for a family of four). The Massachusetts Institute of Technology Living Wage Calculator shows that a living wage for a Metro Area household with two working adults and two children is \$28/hr (\$116,480/year)—nearly 4x the federal poverty level. This figure is also well above the \$82,901 median household income for the Metro Area,^c revealing that more than half of area households do not earn a living wage. High housing costs contribute to this financial burden. Over half of Metro Area and TA residents spend more than 30% of income on housing.^d In the Sunrise Corridor high priority brownfield site block group, that number reaches 100% (Table 5).

Metro has found that conventional demographic analysis methods can overlook pockets of concentrated low income and vulnerable communities. To avoid overlooking these communities and to understand the conditions nearest to the high priority brownfields, low income and unemployment rates are provided in the table below for the block groups where the identified priority brownfield sites are located.

Table 5. Demographic Indicators	Block Group (BG) of High Priority Brownfield Site*				Oregon	US
	82 nd Ave Site BG	TV Hwy Site BG	Sunrise Corridor Site BG	SW Corridor Site BG		
Size (Sq. Mi.)	0.15	0.18	1.95	0.73	--	--
Population	1,013	1,015	1,264	624	4.3M	332M
Unemployment rate	11%	0%	4%	14%	6%	6%
Low Income	31%	38%	41%	44%	29%	31%

^d US Census American Community Survey 2021 5-year Estimates

Table 5. Demographic Indicators	Block Group (BG) of High Priority Brownfield Site*				Oregon	US
	82 nd Ave Site BG	TV Hwy Site BG	Sunrise Corridor Site BG	SW Corridor Site BG		
Housing Cost Burdened	69%	52%	100%	56%	51%	49%

All data from EJScreen accessed 10/15/23; *82nd Ave Block Group #: 410510017023; TV Hwy Block Group #: 410670329042; Sunrise Corridor Block Group #: 410050221081; SW Corridor Block Group #: 410670307001

As shown in the table, communities nearest to the high priority brownfields have lower incomes and/or higher unemployment rates than state and US averages—resulting in diminished income tax revenue for brownfield projects. Additionally, there is a severe lack of discretionary income, intensifying the need for additional sources of funding for brownfield revitalization.

Initial inventories indicate there are upwards of 1,500 potential brownfields in the TAs. Assuming an average total cost of \$40K per site to complete Phase I and II Environmental Sites Assessments (ESAs), the total costs to even begin addressing these brownfields would top \$60M. State funding that may have been available for brownfield projects is being dedicated to the state’s urgent addiction, housing, and homelessness crises. The 2023-2025 state budget included a 29% increase in funding to tackle these issues. Additionally, with federal COVID funding running out, the budget included 2.5% in cuts to state services. As described in Section 1.a.i, Coalition member counties are struggling with budget shortfalls as funds are directed to the region’s urgent housing, homelessness, and addiction crises. Unlike many states, Oregon does not have a state fund to pay for underground storage tank assessment and cleanup. DEQ’s sole sources of funding to support brownfield assessments are provided through EPA’s two 128(a) programs—one is limited to \$520K over the next two years and the other is limited to \$290K over the next year. This funding is in high demand and is not sufficient to address TA brownfields in addition to all other brownfield needs in Oregon.

2.a.ii. Threats to Sensitive Populations: (1) Health/Welfare of Sensitive Populations: Each TA is within a Metro Equity Focus Area, with a concentration of people with low incomes, and people of color or people with limited English proficiency. Each of the TAs also includes disadvantaged census tracts defined by the Justice40 initiative and the Climate and Economic Justice Screening Tool (CEJST) as areas that have burdens related to climate change, the environment, health, and/or lack of economic opportunity, and have low incomes.

Sensitive Population	82 nd Ave	TV Hwy	Sunrise Corridor	SW Corridor
People of Color	83 rd	98 th	63 rd	76 th
Low Income	58 th	71 st	76 th	80 th
Unemployed	86 th	0	46 th	92 nd
Limited English	74 th	94 th	92 nd	69 th
Less than HS	55 th	94 th	83 rd	47 th
Under age 5	93 rd	76 th	0	0
Over 64	9 th	59 th	79 th	63 rd

To minimize dilution of sensitive populations by assuming that the large census tracts that touch the TAs are representative of the communities, the data in Table 6 shows EJScreen data for the block groups where the priority brownfields are located. Communities of color and low incomes are prevalent in these areas. US Census data also shows that poverty disproportionately impacts children in the SW Corridor where the child poverty rate is 20% compared to 14% statewide. The senior poverty rate in the 82nd Ave and SW Corridors is more than twice the statewide rate.^e Unemployment is disproportionately high in the 82nd Ave and SW Corridors. Lower educational attainment is apparent in

the TV Hwy and Sunrise Corridors. There is a higher concentration of children in the 82nd Ave and TV Hwy Corridors, and a higher concentration of elderly residents in the Sunrise and SW Corridors.

In addition to brownfield contaminants, these communities face exposure to high vehicle crash areas, poor air quality, heat islands, and a lack of greenspaces and walkability. In Portland, 60% of deadly car accidents occur on the 8% of streets that comprise the “High Crash Network” which includes 82nd Ave.^f Each of the TA corridors also made Metro’s 2017 list of high injury corridors.^g Poor air quality from heavy traffic also impacts the health and welfare of TA residents. EJScreen shows that the TAs are in the 78th to

^e US Census

^f <https://www.portland.gov/transportation/vision-zero/high-crash-network>

^g <https://www.oregonmetro.gov/sites/default/files/2018/05/25/high-injury-corridors-report-April-2017.pdf>

96th state percentiles for traffic proximity and the 53rd to 89th for diesel particulate matter. The 82nd Ave and Sunrise corridors are in the 81st and 92nd state percentiles for ozone, respectively.

Due to vast paved areas that absorb and emit heat, vehicle emissions, and minimal tree cover, the TAs are heat islands^h where the average temperature is higher than the region (Section 3a). Temperatures in the Metro Area are rising. The region’s 2021 heat wave was responsible for 72 deaths in Multnomah County alone. The priority brownfield sites are contributing to the heat island effect--they have no vegetation or tree cover, and three are asphalt paved.

The redevelopment plans for the TAs and high priority brownfields will mitigate these health and welfare issues by promoting dense in-fill development that improves walkability, lessens the need for car travel to reach jobs, services, and amenities, and leverages green infrastructure that mitigates heat island effects. This will in turn reduce the risk of physical injury, respiratory illness, and heat-related illness currently experienced by TA residents (Section 2.a.ii.2).

(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: EJScreen state percentiles

Table 7. Health and Disease	82nd Ave	TV Hwy	Sunrise Corridor	SW Corridor
Low Life Expectancy	59 th	7 th	90 th	58 th
Heart Disease	7 th	35 th	77 th	18 th
Asthma	71 st	77 th	74 th	53 rd
Persons with Disabilities	84 th	23 rd	69 th	84 th
Lack of Health Insurance	20 th	82 nd	94 th	51 st

for health disparities in the priority site block groups are presented in Table 7. Each TA has disproportionately high occurrences of asthma, and most have low life expectancies, large proportions of persons with disabilities, and a lack of health insurance. While these data reveal the high incidences of diseases to some extent, it is challenging to evaluate health data geographically without masking disparities in specific sections of the TAs. For example, the southern end of the 82nd

Ave corridor is in the 81st state percentile for low life expectancy. The block group adjacent and west of the TV Hwy high priority site is in the 93rd state percentile for low life expectancy and the 69th for cancer. These poor health outcomes may be linked to disproportionate exposure to brownfield contaminants. Heart disease is linked to exposure to metals such as lead and arsenic.ⁱ A 2020 study found suppressed immunity in people living near brownfields, which may account for the low life expectancies and high proportion of people with disabilities in the TAs.^j TA community exposure to air pollution and heat islands exacerbates conditions like asthma and can also contribute to heart disease and lower life expectancy. This grant will identify and help mitigate cumulative exposure of TA residents to contamination associated with brownfields and will support TOD which will reduce air pollution and heat islands that can exacerbate these health conditions.

(3) Environmental Justice (EJ): (3.a)

Identification of EJ: Metro’s Regional Brownfield Scoping Project found that brownfields in the Metro Area are three times more common in places that have disproportionately large sensitive populations, a lack of essential services and living-wage jobs, and poor health outcomes. Each TA includes disadvantaged census tracts identified on the CEJST tool. These communities face EJ issues including proximity to a high number of brownfields, traffic emissions, industrial air and water discharges, and the Portland Harbor Superfund site. The EJScreen data summarized in Table 8 shows that Target

Table 8. EJ Supplemental Indexes for Block Group of High Priority Brownfield Site – State Percentile				
Indicator	82nd Ave	TV Hwy	Sunrise Corridor	SW Corridor
Diesel PM	88 th	68 th	93 rd	91 st
Air Toxics Cancer Risk	90 th	78 th	96 th	95 th
Air Toxics Respiratory HI	86 th	73 rd	94 th	92 nd
Toxic Releases to Air	89 th	70 th	96 th	87 th
Traffic Proximity	86 th	90 th	88 th	92 nd
Superfund Proximity	79 th	75 th	97 th	82 nd
RMP Facility Proximity	61 st	93 rd	94 th	77 th
Haz Waste Proximity	72 nd	82 nd	94 th	89 th
Underground Storage	82 nd	91 st	80 th	90 th
Wastewater Discharge	36 th	92 nd	16 th	84 th

^h <https://regionalbarometer.oregonmetro.gov/pages/climate-adaptation>

ⁱ Journal of the American Heart Association <https://www.ahajournals.org/doi/10.1161/JAHA.123.029852>

^j National Library of Medicine <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7483819/>

Area low-income communities and communities of color areas are more exposed to diesel particulate matter (PM), and toxic releases to air that can cause cancer and respiratory illnesses. The heavy traffic and lack of vegetation and tree cover in the TAs also causes heat island effects. Metro data on heat islands shows that in the census tracts of the 82nd Ave, SW, and Sunrise Corridor priority sites, 45-60% of the land surface is paved compared to 37% region wide. This pavement along with buildings and other hard surfaces absorb and retain heat. Metro data shows that the average temperatures in the census tracts that contain the high priority sites are 0.9 to 3.9 degrees warmer than the regional average.

These EJ issues result in some of the worst air quality in the region, compromising the health of TA residents. Despite a relatively mild wildfire smoke season in 2022 in the Metro Area, regional air quality decreased compared to the previous year.^k In addition to air pollution, the auto-oriented corridors make residents more vulnerable to traffic injuries. The presence of brownfields combined with these other EJ issues contributes to vacancy and low property values which impacts the financial wellbeing of TA residents and suppresses private investment in livability enhancements.

(3.b) Advancing EJ: The TAs for this grant were selected specifically because they are communities of color and lower incomes that are disproportionately impacted by brownfields and environmental hazards. One of the most powerful ways that this grant will advance EJ is by centering community-based nonprofits comprised of local historically underrepresented communities (Section 2.b) in setting brownfield revitalization goals and priorities to ensure existing communities benefit from enhancements. To accomplish this, the grant will leverage the EDS work of the nonprofit project partners identified in Section 2.b to extend the principals of equitable development to brownfield projects, including ensuring that brownfield revitalization is completed in concert with anti-displacement strategies. The grant and the reuse plans it enables will advance EJ in the Target Areas by: 1) eliminating brownfield contaminants from the array of pollution and toxic materials these communities are exposed to; 2) prioritizing climate resilient brownfield redevelopment through reuses that increase shade, sequester atmospheric carbon, and promote transit-oriented development to reduce reliance on single-occupant vehicles thereby limiting further temperature increases and air quality deterioration; and 3) bringing jobs, services, and amenities to attract further investment and improve economic health and opportunity in these underserved communities.

2.b. Community Engagement: 2.b.i. Project Involvement/2.b.ii Project Roles: Nonprofit associations comprised of community organizations, residents, business owners, philanthropic partners, and state and local governments have been established (or are forming currently) in each of the TAs to voice local goals and priorities and help shape equitable planning and development practices. Metro and Coalition partners will work closely with these four organizations to plan and implement community engagement.

82nd Ave Coalition: This community-led coalition formed when the City of Portland took ownership of 82nd Ave and is deeply engaged with the City of Portland, Metro and other stakeholders in *Building a Better 82nd* (Section 1.b). This group is made up of multiple community organizations (Oregon Walks, Verde, Asian Pacific American Network of Oregon, and Unite Oregon) who represent the rich cultural and ethnic diversity of communities in this corridor. They are facilitating community engagement and helping to prioritize current and future investments in equitable planning including safety, placemaking, mixed-income and affordable housing, and celebrating diversity in the corridor. Contact: Zachary Lauritzen, Executive Director of Oregon Walks, (541) 805-5425, zachary@oregonwalks.org.

SW Corridor Equity Coalition (SWEC): SWEC was formed during development of the *SW Equitable Development Strategy* (Section 1.b) to advise and inform Metro, regional counties, and other stakeholders on equitable development needs. The structure of this organization centers frontline communities in the corridor who form a Leadership Cohort and Advisory Committee and who work on sub-committees focused on strategies for anti-displacement, business development, and community development, all through an equity lens. Contact: Mohanad Alnajjar, Washington County Chapter Director, Unite Oregon, (503) 287-4117, mohanad@uniteoregon.org.

TV Hwy Equity Coalition (TEC): The purpose of TEC is to bring together a mix of perspectives from community and direct service organizations to write an equitable development strategy for the TV Hwy corridor. TEC is led by Coalition Partner, Unite Oregon, which has been dedicated to social and

^k <https://www.thelundreport.org/content/portland-area-air-quality-getting-worse-annual-report-card-shows>

environmental justice work in the region in Oregon for 20 years. Contact: Mohanad Alnajjar, Washington County Chapter Director, Unite Oregon, (503) 287-4117, mohanad@uniteoregon.org

Sunrise Corridor EDS: Clackamas County is embarking on development of an EDS based on the model established in the other Target Areas. Part of that process is selecting a local community-based organization focused on equity to steer the process. That organization will be in place by early 2024 and will work cooperatively to help develop and make recommendations on health, equity, anti-displacement, economic growth, land use, and transportation issues that intersect with brownfield reuse plans. The County is soliciting interest now and will invite individuals who represent diverse corridor interests and lived experiences. Contact: Jamie Stasny, Regional Transportation and Land Use Policy Coordinator, Clackamas County, (971) 678-6406, jstasny@clackamas.us.

2.b.iii. Incorporating Community Input: The Coalition will create community capacity to learn about and provide meaningful input into the project. The Coalition will develop a Public Involvement Plan (PIP) to guide outreach from the project start. The PIP will be reviewed and approved by each Coalition partner and the four TA nonprofit groups described in Section 2.b.ii. The PIP may be provided in multiple languages to facilitate these reviews. The PIP will outline approaches and tools such as: a schedule of stakeholder and public meetings/events, outline how to leverage outreach outlets and tools such as the *Building a Better 82nd* newsletter, social media tools, translation of materials into appropriate languages, and times and locations of public meetings that are ADA accessible and on public transit routes. The PIP will serve as a guide to the Coalition and the nonprofit partners in conducting outreach and incorporating community input throughout the grant term

The Coalition will meet with the four TA nonprofit groups during the grant term either by attending scheduled group meetings or holding project-specific meetings. The Coalition will meet with these groups at least three times in the first six months of the grant term to build their outreach capacity by familiarizing them with eligible grant activities and terminology. After the first six months, the Coalition will meet with each group at least twice/year to share news of the grant and obtain input.

The Coalition will hold a public kickoff event upon grant award, and at least three additional events during the grant term. Metro and the Coalition partners have experience soliciting, considering, and adopting public input using a variety of methods including electronic polling and surveys at events, capturing input during workshops/charettes, and collecting input via a project webpage.

Electronic copies of engagement materials will be made available on Metro and Coalition partner websites, and links to these materials will be placed on the websites of the four TA nonprofits. Hard copies of these materials will be made available at Metro and Coalition partner offices and distributed to the four nonprofit organizations for dissemination in the TAs. The Coalition will compile community input on a quarterly basis and develop options for adopting input. Public input and responses will be summarized in the quarterly project progress reports and on the project webpage.

3. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS: 3.a. Description of Tasks/Activities & Outputs:

Task 1: Project Management	Lead: Metro
<p>Implementation: Metro has contracted with a roster of environmental contractors experienced with EPA Brownfield Grants to assist with this project. Metro will ensure compliance with grant terms and conditions and the project work plan and will direct and manage the technical work of the project contractors. Project contractors will perform various project management functions (e.g., assist with reporting and ACRES entries, budget reporting, report review, etc.).</p>	
<p>Schedule: Metro will lead project management for the 4-year grant period including monthly drawdowns, Quarterly Progress Reports, annual Disadvantaged Business Enterprise reports, annual financial reports, final reporting, and all other reporting required by the Cooperative Agreement with EPA. Metro will provide status updates regarding the project schedule and budget to the Coalition at least quarterly.</p>	
<p>Outputs: Quarterly Reports with budget status tables; Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database updates; Annual disadvantaged business enterprise reports; Annual Federal Financial Report; Final Project Closeout Report.</p>	
Task 2: Community Engagement	Lead: Coalition

Implementation: The Coalition will: 1) prepare a PIP with outreach tools, methods for collecting, incorporating and responding to public input, and a schedule of outreach events; 2) meet at least quarterly to discuss site selection and project progress; 3) hold at least 4 community events during the grant term; 4) create a project webpage on each Coalition member website; 5) develop and distribute fact sheets, press releases, and other outreach materials, 6) develop and implement project-specific methods to solicit, consider and respond to community input, and 7) coordinate meetings with the four TA nonprofits, property owners, and stakeholders. Metro has allocated \$40K in participant support for costs incurred by members of the four nonprofit partner organizations listed in Section 2.b (\$10K per group) to participate in eligible grant activities. This funding will be used for stipends for costs such as travel fees, childcare, and food for members of the nonprofit partner groups participating in eligible grant activities such as project meetings and grant-related community engagement. Metro will obtain written EPA approval prior to providing stipends. Participants will be required to provide receipts and a description of the costs incurred and the eligible project activity the stipend is supporting, and a statement that the costs are not covered by support provided through another program. Metro will provide training to participants outlining the stipend program rules and processes at the start of the project.

Schedule: Community Engagement milestones include: 1) hold first meeting with four TA nonprofit groups within 2 months of grant term; 2) complete PIP and hold public project kickoff meeting within the first 6 months of grant term; 3) develop project webpages and fact sheets within 6 months of grant term; 4) hold quarterly Coalition meetings; and 5) hold at least four grant-related community events.

Outputs: PIP; Coalition, public, and property owner meeting presentations, handouts, and notes; Project webpages; Press releases, fact sheets and other educational materials.

Task 3: Site Selection and Assessments	Site Selection Lead: Coalition Technical Task Lead: Metro will direct contractors
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Implementation: The Coalition plans to complete 37 Phase I ESAs and 27 Phase II ESAs/Building Materials Surveys. Eligibility forms will be completed for EPA review (and DEQ review for petroleum sites) prior to each assessment. National Historic Preservation Act and Endangered Species Act Clearances will be completed and documented prior to each Phase II ESA/Building Materials Survey. Phase I ESAs will comply with the EPA’s All Appropriate Inquiry Rule and ASTM E1527-21. Metro will oversee contractor preparation of a project-wide Quality Assurance Project Plan (QAPP) and Sampling & Analysis Plans (SAPs) for EPA (and DEQ as needed) approval prior to Phase II ESAs. An access agreement will be executed for each assessment.

Phase II ESAs will include sampling soil, soil gas, groundwater, building materials and/or other activities as needed and approved by EPA. Metro and the contractor will work with DEQ when state oversight is needed (e.g., to obtain a No Further Action Letter). The Coalition, supported by technical contractors, will discuss the findings of ESAs and next steps with property owners and stakeholders. If the Coalition needs to identify additional sites for assessment, Metro will direct the contractor to prepare brownfield inventories of the TAs and the Coalition will develop criteria to guide site selection.

Schedule: QAPP completed December 2024. The first Phase I ESA is anticipated March 2025, and 9-10 Phase I ESAs will be completed per year. The first Phase II ESA is anticipated August 2025, and 6-7 Phase II ESAs will be completed per year. If needed, inventory will be developed in year 3 to identify additional sites.

Outputs: Eligibility forms; EPA-approved QAPP and SAPs; Site access agreements; Health and safety plans; Phase I and II ESA reports; Prioritized brownfield inventory.

Task 4: Cleanup & Reuse Planning	Lead: Metro
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Implementation: The budget includes funding for 4 area-wide plans (AWPs), 4 site-specific cleanup plans, and 4 cleanup plans. These plans may include technical environmental remediation recommendations, evaluations of cleanup options, cleanup cost estimates, or planning and market analyses to evaluate the feasibility of reuse options. Just over 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority sites within the Target Areas.

Schedule: The Coalition anticipates completing four area-wide/site specific cleanup/reuse plans in each of years 2, 3, and 4 of the grant term.

Outputs: 4 area-wide and 8 site-specific cleanup/reuse plans.

3.b. Cost Estimates: A summary of the proposed budget for grant funded activities is provided below, followed by an explanation for how cost estimates were developed and applied, including unit costs as applicable. An average \$175/hour was used for QEP contractual services.

Budget Categories		Project Tasks (\$)				Total
		Task 1 PM	Task 2 Engagement	Task 3 Selection & Assessment	Task 4 Planning	
Direct Costs	Personnel and Fringe	\$0	\$0	\$0	\$0	\$0
	Travel	\$8,600	\$0	\$0	\$0	\$8,600
	Other (Conf. Reg. Fees)	\$1,800	\$0	\$0	\$0	\$1,800
	Other (DEQ VCP Fees)	\$0	\$0	\$30,000	\$10,000	\$40,000
	Other (Stipend)	\$0	\$40,000	\$0	\$0	\$40,000
	Contractual	\$48,125	\$20,125	\$900,350	\$441,00	\$1,409,600
Total Direct Programmatic Costs		\$58,525	\$60,125	\$930,350	\$451,000	\$1,500,000

Task 1: Project Mgmt. (\$58,525): *Travel:* \$8,600 2 City personnel attend 2 national and 1 local brownfield conferences: airfare (\$2,000 [\$500/person, 2 national conferences, 2 people]); hotel (\$4,800 [\$200/night, 4 nights, 3 conferences, 2 people]), meals/incidentals (\$1,800 [\$75/day, 4 days, 3 conferences, 2 people]). *Other:* \$1,800 (conference registration fees [\$300/conference]); *Contractual* \$48,125 (275 hours for project management).

Task 2: Community Engagement (\$60,125): *Contractual:* \$20,125 (115 hours for meeting planning, attendance, and input evaluation; and outreach material preparation). *Stipend:* \$40,000 (\$10,000 for each TA lead community organization listed in Section 2.b). Participant costs/stipends will be based on receipts provided for eligible costs incurred through participation in project-specific activities.

Task 3: Site Selection & Assessment (\$930,350): *Contractual* \$900,350: Phase I ESAs (\$185,000 [37 x \$5,000/each]); QAPP (\$4,200); Phase II ESAs (\$661,150 [22 @ \$30,052.27/each including 100 hours labor, \$5,000 lab testing, and \$7,052.27 for drilling, locates, and investigation-derived waste disposal]); RBM Surveys \$50,000 [5 x \$10,000/each including 36 hours labor and \$3,700 lab testing]). *DEQ VCP Fees:* \$30,000. **A total of 62% of grant funding has been budgeted for Phase I and II ESAs.**

Task 4: Cleanup/Reuse/AWP Planning (\$451,000): *Contractual:* \$441,000 (Cleanup Plans - 4 plans x \$14,000/each [80 hours]; Reuse Plans - 4 plans x \$17,500/each [100 hours]; AWP – 4 plans x \$78,750 [450 hours]). *DEQ VCP Fees:* \$10,000.

3.c. Plan to Measure and Evaluate Environmental Progress and Results: Metro will track project outputs (number of ESAs, outreach events and materials, quarterly reports, cleanup and reuse plans) and summarize them in each quarterly progress report and in ACRES. The Coalition will select outcomes to track that relate directly to goals established in local plans (Section 1.b.i). The Coalition anticipates tracking outcomes such as: number of new affordable housing units and climate resilient projects underway/completed on brownfields; local community input on improved walkability, transit options, neighborhood services, and livability; reduction in commercial vacancy; greenspaces created on brownfields; funding leveraged. Outcome metrics will be listed in the Work Plan and progress will be reviewed at least quarterly through the grant term. Progress toward achieving the outputs and outcomes, and any corrective steps required to maintain the Work Plan commitments and timeline, will be presented in quarterly reports. Metro commits to updating ACRES during and beyond the end of the grant term to document longer-term outcomes of the grant.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE. 4.ai Programmatic Capability: 4.a.ii Organizational Structure and 4.a.iii Key Staff: Metro Principal Regional Planner, Brian Harper, will manage the project. Metro’s planning, economic development, administrative, and grant management staff have capacity and EPA Brownfield Grant experience to complete the project in the 4-year term. Metro has procured environmental contractors experienced with EPA Brownfield Grant projects. Brian will supervise and direct the project contractors. Metro will lead the Coalition using a collaborative

governance structure to consider the interests of each member. The governance structure will be documented in a Memorandum of Agreement before the project begins.

Brian Harper has 21 years of experience in planning and brownfield redevelopment. He is successfully managing a FY20 EPA Brownfield Coalition Assessment Grant with a focus on providing affordable housing sites for purchase and development. Brian previously managed and implemented Metro's FY16 EPA Brownfield Coalition Assessment Grant along the McLoughlin Corridor.

David Tetric, Metro Senior Economic Development Planner, has 7 years of experience in planning and brownfield redevelopment. He successfully managed two EPA Brownfield Assessment Grants at the City of Beaverton, Oregon, addressing historical auto use sites and revitalizing the city's downtown core. David applied for and managed two EPA Brownfield Cleanup Grants that facilitated the cleanup of petroleum and assisted in the development of the City of Beaverton's Public Safety Center now housing the city's police and emergency management divisions.

4.a.iv. Acquiring Additional Resources: Metro has robust procurement systems in place if additional resources are needed. Metro posts all requests for bids/proposals on its website and provides proposal templates and workshops to assist contractors and promote equity in hiring. Metro's follows the National Institute of Governmental Purchasing code of ethics, which ensures a level playing field and avoids conflicts of interest. Metro is committed to building a diverse workforce with access to skill development and living wage jobs. Metro is a member of Partners in Diversity, a local nonprofit that connects professionals of color with job opportunities. Metro is also teaming with stakeholders from private industry, apprenticeship programs, unions, and CBOs to provide career pathways for women and people of color in the trades through the regional Construction Careers Pathway framework.

4.b. Past Performance and Accomplishments. 4.b.i Currently Has/ Previously Received an EPA Brownfields Grant: (1) Accomplishments: Metro has received four EPA Brownfield Assessment Grants in the last 17 years: FY06 (\$200K), FY08 (\$200K), FY16 (\$600K), and FY20 (\$600K). In FY16, Metro formed a coalition with Clackamas County and Oregon City to address brownfields in the McLoughlin Corridor TA. Metro completed 9 Phase I ESAs, 6 Phase II ESAs, 3 Analysis of Brownfield Cleanup Alternative reports, one Area-Wide Environmental Study, and held quarterly advisory committee meetings. Metro has a current FY20 Coalition Assessment Grant with Clackamas, Washington, and Multnomah Counties focused on brownfield revitalization for affordable housing. Metro has used the grant to leverage affordable housing development bonds to further brownfield cleanup and reuse as affordable housing units. To date, the grant has funded 9 Phase I ESAs, 5 Phase II ESAs, 2 Hazardous Building Material Surveys, 2 reuse plans, and 1 Contaminated Media Management Plan. Several of the sites have broken ground, including: 1) Plaza Los Amigos in Washington County, a \$39.2M affordable housing project that will provide 86 family-sized units and provide up to 196 construction jobs; 2) the Portland Value Inn in Multnomah County; purchased as a near-term solution to shelter unhoused individuals and provide wrap-around services, eventually transitioning to a \$56.6 million dollar affordable housing redevelopment, providing 98 total units, and; 3) The Walker Road Project in Hillsboro, OR, a \$34.5 million dollar affordable housing development that will provide 66 total units, half of which will be family-sized.

(2) Compliance with Grant Requirements: Metro completed the FY06 and FY08 EPA Brownfield Grant projects within the grant period and in agreement with the project work plan. Metro expended the funds with just \$2 of FY06 funds remaining and just \$220 of FY08 funds remaining at the end of the terms. Metro achieved the goals of these grant projects and completed ACRES, quarterly, annual and end-of-term reporting. Metro completed the FY16 EPA Coalition Assessment Grant on September 30, 2020, with just \$74 of Hazardous Substance funds remaining and \$5,345 of Petroleum funds remaining. Metro is complying with the workplan including ACRES and quarterly reporting for the FY20 grant. Metro received a one-year extension from EPA on the FY20 grant. As of October 1, 2023, Metro has expended over 79% of the FY20 grant funds (period: 10/1/20 to 11/9/23). Metro has fully expended all assessment dollars on the grant with the only remaining funds being utilized on remaining planning work. With these expenditures, the FY20 funds will be expended by the current Cooperative Agreement end date of September 30, 2024.

Oregon Metro – FY24 EPA Brownfield Assessment Coalition Grant

Threshold Criteria

1. **Applicant Eligibility and Documentation**: Metro is a metropolitan service district created by the Oregon State Legislature (defined in Oregon Revised Statutes [ORS] Chapter 268) and is authorized by Congress and the State of Oregon to serve as the Metropolitan Planning Organization (MPO) for the region. Metro meets the definition of a “local government” under 2 CFR 200.1 and is eligible to receive U.S. EPA funds for Brownfields Assessment grants, as it has previously.
 - a. The Metro Charter and ORS 268.300 are attached.
 - b. Metro is not a 501(c)(4) organization.
2. **Number and Eligibility of Non-lead Coalition Members**: Metro has three non-lead coalition members. They are as follows:
 - a. Washington County is a County government that is eligible for EPA Brownfield Grant funding.
 - b. Clackamas County is a County government that is eligible for EPA Brownfield Grant funding.
 - c. The Center for Intercultural Organizing doing business as Unite Oregon is a (501(c)(3) nonprofit organization that is eligible for EPA Brownfield Grant funding. Documentation of Unite Oregon’s tax-exempt status is attached.
 - i. None of the coalition members are 501(c)(4) organizations.
3. **Target Areas**: The target areas of Metro and each of its coalition members are identified in the application Narrative and the Narrative Information Sheet. The Target Areas do not overlap.
4. **Existing Brownfields Grants to Non-lead Members**: Metro confirms that each non-lead coalition member is not the recipient of an open cooperative agreement for MARC Grant funding or a MARC Grant that closed in 2016 or later.
5. **Coalition Agreement**: Coalition member commitment letters are attached. These letters also confirm:
6. **Community Involvement**: Nonprofit associations comprised of community organizations, residents, business owners, philanthropic partners, and state and local governments have been established (or are forming currently) in each of the Target Areas to voice local goals and priorities and help shape equitable planning and

Oregon Metro – FY24 EPA Brownfield Assessment Coalition Grant

Threshold Criteria

development practices. Metro and Coalition partners will work closely with these four Target Area community liaison groups to solicit community input on brownfield redevelopment plans.

The Coalition will develop a Public Involvement Plan (PIP) to guide outreach from the project start. The PIP will be reviewed and approved by each Coalition partner and the four Target Area community liaison groups. The PIP may be provided in multiple languages to facilitate these reviews.

The Coalition will meet with the four Target Area community liaison groups either by attending established group meetings or coordinating project-specific meetings. The Coalition will meet with these groups at least three times in the first six months of the grant term to familiarize them with the eligible grant activities and terminology, and to develop and finalize the written PIP. After the first six months, the Coalition will meet with each group at least twice/year to share news of the grant and obtain input.

The PIP will outline approaches and tools such as: a schedule of stakeholder and public meetings/events, outline how to leverage outreach outlets and tools such as the Building a Better 82nd newsletter, social media tools, translation of materials into appropriate languages, and times and locations of public meetings that are ADA accessible and on public transit routes.

The Coalition will hold a public kickoff event upon grant award, and at least three additional engagement events during the grant term. Metro and the Coalition partners have experience soliciting, considering, and adopting public input using a variety of methods including electronic polling and surveys at events, capturing input during workshops/charettes, and collecting input via a project webpage.

Electronic copies of engagement materials will be made available on Metro and Coalition partner websites, and links to these materials will be placed on the websites of the four Target Area nonprofits. Hard copies of these materials will be made available at Metro and Coalition partner offices and distributed to the four nonprofit organizations for dissemination in the Target Areas.

7. **Expenditure of Existing Grant Funds:** Metro is currently implementing the EPA funded “Metro Brownfields Assessment FY21-23” (FAIN: 01J86401). That grant is currently over 78% drawn down as of September 30, 2023. The attached Payment Transaction Confirmation report from 10/5/2023 shows the current draw down amount on the grant.

Oregon Metro – FY24 EPA Brownfield Assessment Coalition Grant Threshold Criteria

8. Contractors and Named Subrecipients:

Contractors: Metro has existing on-call contracts with five contractors and intends use one or more of these on-call contracts during the FY24 Brownfield Grant project, if the grant is awarded. Metro’s procurement procedure used for these on-call contracts was a Request for Proposals (RFP), which followed the procurement standards at 2 CFR 200, 2 CFR 1500, and 40 CFR 33. Price reasonableness was factored into the evaluations.

Details regarding the RFP process are provided below:

- The RFP and related documents were posted on [Metro’s website](#) and on [bidlocker.us](#) on 05/22/2023.
- The RFP was also publicized in The Asian Reporter on 05/24/2023.
- The RFP was advertised for seven days and included a 38-day bidder response period.
- No firms were directly solicited. Due to the RFP being publicly available it is unknown how many contractors obtained the RFP. A list of organizations that downloaded the RFP and other attachments generated by Bidlocker is attached.
- The RFP included three service categories respondents could choose to respond to, including a Brownfield Assessment and Redevelopment category. Metro received and considered five proposals in response to this service category. Metro selected and has entered into on-call contracts with all five contractors: Stantec, Maul Foster & Alongi, Cascade Environmental Solutions, Farallon Consulting and Terraphase Engineering. The solicitation documents and the signed contracts are attached.

Named Subrecipients: Not applicable