



Orange County Council of Governments

Orange County Council of Governments (OCCOG)
3972 Barranca Parkway, Ste. J127
Irvine, CA 92606

info@occog.com

R09-24-A-015

RE: FY2024 EPA Brownfields Assessment Coalition Grant Application

The Orange County Council of Governments is pleased to submit this proposal for FY2024 Brownfields Assessment Coalition Grant funding. Below we provide the information requested.

1. Applicant Identification:

Orange County Council of Governments
3972 Barranca Pkwy, Suite J127
Irvine, CA 92606

2. Funding Requested:

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

3. Location:

- (a) Cities: Orange, Garden Grove, Santa Ana, Anaheim
(b) County: Orange
(c) State or Reservation: California

4. Coalition Members' Target Area & Priority Site Information:

Target Area Name	Census Tract Number	Priority Site Address(es)
Orange County Council of Governments (Lead Coalition Member)		
East Anaheim	6059011714	2951 E La Palma, Anaheim (@ Red Gum St)
NeighborWorks Orange County (Coalition Member #1)		
Harbor Boulevard (Garden Grove)	6059088501 6059089003	13401 S Harbor Blvd, Garden Grove (@ Garden Grove Fwy) 13531 S Harbor Blvd, Garden Grove (SW Corner @ Trask)
City of Garden Grove (Coalition Member #2)		
International West	6059088402 6059088502	12401-21 S Harbor Blvd, Garden Grove (N of Lampson) 12521 S Harbor Blvd, Garden Grove (SW Corner @ Lampson)
City of Orange (Coalition Member #3)		
Marlboro Neighborhood	6059076204	1465 N Batavia St, Orange
City of Santa Ana (Coalition Member #4)		
Harbor Boulevard (Santa Ana)	6059089105	101 N Harbor Blvd, Santa Ana (NE Corner @ 1st) 405 N Harbor Blvd, Santa Ana (SE Corner @ 5th)



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5. Contacts:

(a) Project Director:

Name: Marnie O'Brien Primmer, Executive Director
Phone: 949-698-2856 | Email: marnie@occog.com
Mailing Address: 3972 Barranca Pkwy, Suite J127, Irvine, CA 92606

(b) Chief Executive/Highest Ranking Elected Official:

Name: Marnie O'Brien Primmer, Executive Director
Phone: 949-698-2856 | Email: marnie@occog.com
Mailing Address: 3972 Barranca Pkwy, Suite J127, Irvine, CA 92606

6. Population: The population data below reflects American Community Survey 5-year data.

- Population of Target Areas:
 - City of Orange: 139,911
 - City of Garden Grove: 171,949
 - City of Santa Ana: 310,227
 - City of Anaheim: 346,824
- Population of Orange County: 3,186,989

7. Other Factors:

Other Factors Criteria	Page #
Community population is 10,000 or less.	5*
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
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).	NA
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	NA
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3-4
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.	NA
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.	NA

*The target areas of East Anaheim and Marlboro Neighborhood have populations <10K.



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8. Letter from the State or Tribal Environmental Authority: A letter of acknowledgement from the California Department of Toxic Substances Control (DTSC) is attached.

9. Releasing Copies of Applications: We request to have the following information redacted:

- Point of contact information for project partners identified in Section 2.b.iii.
- Contract document included as Attachment F.



Department of Toxic Substances Control



Yana Garcia
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Director
5796 Corporate Avenue
Cypress, California 90630

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

November 13, 2023

Marnie O'Brien Primmer
Executive Director
Orange County Council of Governments
marnie@occoog.com

ACKNOWLEDGEMENT OF A UNITED STATES ENVIRONMENTAL PROTECTION AGENCY BROWNFIELD ASSESSMENT COALITION GRANT PROPOSAL FOR \$1,500,000

Dear Marnie O'Brien Primmer:

The Department of Toxic Substances Control (DTSC) of the California Environmental Protection Agency acknowledges and supports Orange County Council of Governments' (OCCOG) application for a United States Environmental Protection Agency (USEPA) Brownfield Assessment Coalition Grant (USEPA Grant) for sites within Orange County. OCCOG is requesting funding in the amount of \$1,500,000 to cover the cost of environmental assessments at various sites throughout Orange County. The grant funding will be available for up to 5 years, and both publicly and privately owned sites can be nominated to use the grant funding during the grant implementation period.

Grant funding will be used to identify Brownfield sites in areas of Orange County that have been disproportionately affected by contamination, or potential contamination, and are underutilized due to perceived remedial cost and liability concerns. Grant funding will be used for the following activities: Brownfield Inventories, Stakeholder Engagement, Phase I/II Environmental Site Assessments (ESAs), Regulated Building Materials (RBM) Surveys, Site-Specific Reuse Planning, and Area-Wide Planning.

OCCOG partners will include the City of Garden Grove, the City of Orange, and the community led non-profit NeighborWorks Orange County. OCCOG has identified the

following Justice40 “disadvantaged communities” in Orange County for use of the USEPA Grant funding:

- East Anaheim Commercial/Industrial Valley in the City of Anaheim: Brownfields in this area include a mix of historic commercial and industrial sites. Underutilized sites will be positioned for reuse and redevelopment.
- Harbor Boulevard Corridor in the City of Garden Grove: Brownfields in this area include a mix of historic commercial and industrial sites. Vacant and underutilized sites will be prioritized to further the communities housing and economic development goals.
- Marlboro Neighborhood in the City of Orange: Vacant and underutilized sites in this area will be revitalized in accordance with established community plans.
- Harbor Boulevard Corridor in the City of Santa Ana: Vacant lots and empty buildings in this area will be positioned for an array of transit-oriented development.

DTSC looks forward to the possible award of the USEPA Grant to OCCOG to facilitate the success of assessment and future redevelopment of Brownfields in underserved neighborhoods in Orange County. DTSC is ready to provide the necessary technical support and regulatory oversight, as needed, for projects covered by the USEPA Grant. If you need further information or assistance regarding specific Brownfield sites, or DTSC's Brownfields programs, please feel free to contact me via phone at (714) 484-5321 or via email at Sarah.Larese@dtsc.ca.gov.

Sincerely,



Sarah Larese
Regional Brownfield Coordinator
Site Mitigation and Restoration Program

cc: Maryam Tasnif-Abassi
Brownfield Development Manager
Site Mitigation & Restoration Program
DTSC-Cypress
Maryam.Tasnif-abassi@dtsc.ca.gov

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1.a. Coalition Members, Target Areas, & Brownfields.

1.a.i. Coalition Members: Orange County Council of Governments (OCCOG), the grant applicant, is a joint powers authority acting as the sub-regional planning organization covering 35 jurisdictions in Orange County, California. The role of OCCOG is to collectively convene jurisdictions throughout the County to address land use, housing, energy, mobility, air quality, and water issues and to effectively engage on these important matters with the county as a whole. OCCOG has formed a Coalition with a community-based non-profit organization, NeighborWorks Orange County (NWOC), and the Cities of Garden Grove, Orange & Santa Ana. These coalition members were identified as key partners for this project because of their ongoing partnerships with OCCOG and collective goals of promoting infill development as a means to improving economic conditions, addressing housing shortages, improving transportation corridors and reducing greenhouse gas (GHG) emissions. Additionally, these partners represent some of the most disadvantaged areas of Orange County and, due to budget cuts, have extremely limited staff resources to manage a brownfield grant program on their own. Partnering with OCCOG provides the Coalition members with the means to address their brownfields issues by drawing on OCCOG's grant experience and staff resources.

1.a.ii. Overview of Brownfield Challenges & Description of Target Areas: With a population of 3,200,000, over the past 100 years Orange County, the geographic boundary for this project, has grown from a rural, agricultural community, to become the sixth most populous county in the U.S. In the early 1900s the area was occupied by vast farmlands, which were replaced with tract housing by the mid-1950s as the manufacturing, tourism and service industries began to dominate the local economy. The opening of Disneyland in 1955 made Orange County an international tourist destination and piqued the interest of other industries looking to establish operations in areas that would attract worker talent. In the late 1950s, aerospace firms and light industry began expanding and by 1963 the county population topped one million. Exploding population growth brought an intense demand for new infrastructure that the County struggled to keep up with. While the southern areas of the county have developed as master-planned communities, the denser, older areas of the county have not redeveloped outmoded areas in a cohesive fashion. Areas such as the coastal zone are known for their world-class amenities and access to jobs and housing, other areas of the county are suffering from poverty, lack of quality affordable housing and access to public transit, and some of the nation's worst air quality, crime, and homelessness. To combat the extreme socioeconomic and Environmental Justice (EJ) issues impacting sensitive populations, each of the Coalition partners have selected their own disadvantaged Target Areas (TAs), including: OCCOG – East Anaheim TA; City of Orange – Marlboro Neighborhood TA; City of Garden Grove – International West TA; NeighborWorks OC – Harbor Blvd TA (Garden Grove); & City of Santa Ana – Harbor Blvd TA (Santa Ana). These TAs are home to the highest concentrations of brownfields & sensitive populations in Orange County.

OCCOG, East Anaheim TA in Anaheim: Comprised of two Census Tracts or "CTs" (11714 & 21813), this TA qualifies as a *disadvantaged community*. It includes 779 residents in an area of 4.23 square miles. It is isolated by major freeways, and is bounded by: E Orangethorpe Ave to the north; the Riverside Freeway & Santa Ana River to the south; the Orange Freeway to the West; & the Imperial Highway to the east. E La Palma Blvd serves as the major E/W thoroughfare, with N Tustin Ave bisecting the TA as the major N/S thoroughfare. 66% of residents are people of color, including a mix of Hispanic (30%), Asian (19%) & Black (10%). The TA is characterized as the "Commercial/Industrial Valley", and includes 49 Toxic Release Inventory (TRI) sites. The TA is above the 80th percentile for: proximity to traffic; air quality concerns (particulate matter, ozone & respiratory hazards); & proximity to hazardous waste & wastewater discharges. With a lack of available land in the region, underutilized sites in the TA could be repurposed to meet the community's development goals.

• **City of Orange, Marlboro Neighborhood TA in Orange:** Comprised of CT 76204, which qualifies as a *disadvantaged community*. Located east/northeast of Angel Stadium (baseball) & the Honda Center (hockey), the TA includes 3,624 residents in an area of 2.53 square miles. The TA is bounded by the Santa Ana River to the west; N Glassell St & N Orange Olive Rd to the east; W Fletcher Ave to the north; & the Metro Line & W Walnut Ave to the south. This neighborhood was established in the late 1800s at the intersection of two major railroads. Agricultural and industrial uses lined the railroads and were eventually replaced by high-density, multi-family housing and a mix of commercial use & institutional facilities. Today, 86% of residents are people of color, predominantly Hispanic (81%). The TA is above the 90th percentile for: proximity to traffic; air quality concerns (particulate matter, ozone, respiratory hazards & toxic releases); and proximity to hazardous and wastewater discharges. The TA is non-attainment for air quality. Residents have higher incidences of asthma & lower life expectancies.

• **City of Garden Grove, International West TA in Garden Grove:** Comprised of three CTs (88402, 88403 & 88502), each of which qualifies as a *disadvantaged community*. The TA includes ~16,000 residents in a 1.5 square mile area. Located south of Disneyland on the east side of the City, the TA includes Orange County's busiest thoroughfares. 85% of residents are people of color. The areas is characterized by underutilized commercial corridors, surrounded by lower income residential areas. The TA is above the 90th percentile for: proximity to traffic; air quality concerns (particulate matter, ozone &

respiratory hazards); and proximity to hazardous waste and wastewater discharges. This area is of critical importance for the City and will play a significant role in meeting its housing demands.

- **NeighborWorks OC, Harbor Blvd TA (in Garden Grove):** Comprised of four CTs (88501, 89003, 89102 & 89106), each of which qualifies as a *disadvantaged community*. The TA is densely populated, with 22,584 residents in a 1.95 square mile area. The TA is centered along a 1-mile segment of Harbor Blvd, between the International West TA in Garden Grove (described above) & the Harbor Blvd TA in Santa Ana (described below). 89% of residents are people of color, predominantly Hispanic (60%) & Asian (27%). 32% qualify as low-income & did not complete high school. The TA ranks above the 90th percentile for traffic and air quality concerns. NeighborWorks OC will work with community stakeholders to deliver quality affordable housing with improved access to public transportation.
- **City of Santa Ana, Harbor Blvd TA (in Santa Ana):** Comprised of six CTs (89004, 89104, 89105, 99202, 99248 & 99249), each of which qualifies as a *disadvantaged community*. The TA is densely populated, with 14,813 residents in a one square mile area. The TA is centered along a 2-mile segment of Harbor Blvd, an extension of the International West TA in Garden Grove (described above). 93% of residents are people of color, predominantly Hispanic (64%) & Asian (28%). 45% qualify as low-income & 34% did not complete high school. The TA ranks above the 90th percentile for: proximity to traffic; air quality concerns (particulate matter, ozone, respiratory hazards & toxic releases); & proximity to hazardous waste & wastewater discharges. NeighborWorks OC will work with community stakeholders to help deliver transit-oriented, quality affordable housing for sensitive populations.

1.a.iii. Description of the Priority Brownfields: Orange County has experienced intense growth over the past century, combined with evolving demands for different types of development, resulting in a significant number of brownfields and cumulative environmental impacts. For example, many sites that were originally used for agricultural purposes, later transitioned to industrial or commercial use, and over the past few decades may have transitioned again into residential or institutional use. As a result, many properties may be on their third, fourth or even fifth generation of different types of land use, qualifying most properties within the County's urban areas as potential brownfields. This includes a high concentration of former manufacturing facilities, warehouses, gas stations, auto repairs and other commercial/industrial facilities. Common contaminants of concern (COCs) include: hazardous building materials (HBM), including asbestos-containing materials (ACM), lead-based paint (LBP), and polychlorinated biphenyls (PCBs); petroleum substances; heavy metals; polycyclic aromatic hydrocarbons (PAHs); and chlorinated solvents. The following table identifies priority brownfields within each of the TAs that have the potential to address the communities near-term needs and catalyze additional revitalization activities.

Target Areas	Addresses of Priority Sites	Size (acres)	Former Use; Present Condition	Potential Environmental Concerns (PECs) & Anticipated Funding Needs (AFN)	Reuse Potential
East Anaheim (Anaheim)	2951 E La Palma	2.2	Former Allied Pacific Metals; Vacant Building.	PECs: Soil/vapor; chlorinated solvents & freon AFN: Phase II ESA; Cleanup/Reuse Plan	Commercial/Industrial
Marlboro Neighborhood (Orange)	1465 N Batavia St	6.37	Former SVG – Thermal & Santiago College. Currently Vacant Lot.	PECs: Impacted with heavy metals (arsenic & lead) & chlorinated solvents. AFN: Phase II ESA; Cleanup/Reuse Plans.	Large-Scale Commercial/Industrial
International West (Garden Grove)	12401-21S Harbor Blvd	0.54	Three Vacant Former Residential Lots	PECs: HBM; historic spills; impacted soils/fill. AFN: Phase I/II ESA; HBM Survey; Reuse Plan.	Mixed-Use Development
	12521S Harbor Blvd	0.27	10,000 SF Blighted/Vacant Restaurant.	PECs: HBM; historic spills; impacted soils/fill. AFN: Phase I/II ESA; HBM Survey; Reuse Plan.	Commercial (Retail/Office)
Harbor Boulevard (Garden Grove)	13401 S Harbor Blvd	1.0	Currently Vacant Lot; Adjacent to Gas Station.	PECs: Adjacent gas station; petroleum. AFN: Phase I/II ESA; Cleanup/Reuse Plan.	Affordable Housing
	13531 S Harbor Blvd	1.84	Large Paved Lot Used for Vehicle Storage.	PECs: Impacted soils; petroleum/auto fluids. AFN: Phase I/II ESA; Cleanup/Reuse Plan.	Affordable Housing
Harbor Boulevard (Santa Ana)	101 N Harbor Blvd	1.35	Former Furniture Manufacturer. Vacant Lot.	PECs: Historic spills; petroleum; solvents. AFN: Phase I/II ESA; Cleanup Plan.	Mixed-Use Development
	405 N Harbor Blvd	1.94	Currently Vacant Lot at Prime Intersection.	PECs: Historic spills/dumping; soils/fill. AFN: Phase I/II ESA; Cleanup/Reuse Plan.	Mixed-Use Development

1.a.iv. Identifying Additional Sites: Ongoing brownfield inventory and stakeholder engagement will be key to identifying and prioritizing additional sites for grant funded activities. Site prioritization will focus on several factors including: location within the TAs and/or other disadvantaged and/or underserved areas; feasibility of proposed redevelopment plans redevelopment; and potential to provide near-term benefits in alignment with established community priorities. The Coalition will work with the Brownfields Advisory Committee (BAC), as described in Section 2.b, to establish appropriate ranking and prioritization criteria. Additionally, the Coalition will leverage and engage local and state agencies such as the California Department of Toxic Substances Control (DTSC), Department of Public Health and the Regional Water Quality Control Board for technical assistance and guidance for identifying and selecting potentially eligible sites.

1.b. Revitalization of the Target Areas.

1.b.i. Reuse Strategy & Alignment with Revitalization Plans: Selection of the TAs and priority sites reflects a strategy for focusing grant funding on projects where community need is the greatest and extensive planning has already been

completed. OCCOG, NWOC, & the Cities of Garden Grove, Orange & Santa Ana, have collaborated on the following area-wide reuse plans, which provide a framework for the plans & strategies in the table below:

- East Anaheim Commercial/Industrial Valley (OCCOG TA): In 2011, the City of Anaheim was awarded a grant from the California Strategic Growth Council to prepare a specific plan for the East Anaheim TA. The goal was to create a business environment attractive to a wide variety of industries while encouraging sustainable development. The specific plan focused on removing obstacles to the reuse of existing structures and promote infill development of currently vacant or underutilized properties through the use of flexible, easy to use zoning.
- Harbor Blvd (NWOC and City of Santa Ana TAs): In 2014 the City of Santa Ana updated the Harbor Blvd Mixed-Use Transit Corridor Specific Plan, to outline planned land use and development standards to promote vibrant residential and mixed-use development along Harbor Blvd, while improving connections between activity areas and transit points. Additionally, in June 2018, the Orange County Transportation Authority (OCTA) completed the Central Harbor Blvd Transit Corridor Study. The study included collaboration with the four corridor cities (Fullerton, Anaheim, Garden Grove and Santa Ana), as well as stakeholder feedback. Alternatives were evaluated in accordance with housing demands, mobility needs, and performance measures.
- International West (City of Garden Grove TA): Extensive planning has been completed for this area of critical importance to the City. The vision is to create a transit-oriented development (TOD) district around the planned terminus of the OC Transit line and the station at Harbor Blvd and Westminster Ave. A \$7.1M street-improvement project is currently underway and cleanup of vacant and underutilized properties along the corridor is necessary to create shovel-ready spaces for mixed-use and housing development. An *Economic Impact and Master Plan* and *Environmental Narrative* was prepared for this TA to identify strategies for cleanup and revitalization to complement established entertainment, hospitality, and sports venues in the surrounding areas. To address the City's extreme housing crisis, City Council recently passed a vote to allow for development of 70 residential units per acre in this area. The City has committed to the state they will allow for construction of 19K dwelling units over a 7-year period that began in 2021. Creation of quality, affordable, dense multistory development in this location will help the City meet this goal and allow for workers in the service and tourism industries to live in close proximity to job opportunities in the nearby resort district.
- Marlboro Neighborhood (City of Orange TA): The Marlboro TA and Batavia St Corridor were identified in the City's 2010 General Plan as a prime area for commercial/industrial/institutional use, with an allowable maximum density of 0.75 Floor Area Ratio (FAR). Reuse plans as described in the table are base on this FAR.

TAs	Priority Sites	Site-Specific Reuse Plans & Strategies
East Anaheim	2951 E La Palma	Complete remediation of subsurface impacts associated with former metals facility. May require cleanup/reuse planning activities to mitigate potential impacts. Building includes 48,000 SF of commercial/industrial space.
Marlboro Neighborhood (Orange)	1465 N Batavia St	Former manufacturing facility from 1960s-2000s, then Santiago College Orange Education Center. Currently vacant. Represents one of the largest pieces of available land in the City. Could accommodate up to 240,000 SF of commercial/industrial/institutional space. Funding can be utilized for cleanup/reuse planning activities.
International West (Garden Grove)	12401-21 S Harbor Blvd	Three contiguous lots owned by City of Garden Grove. Reuse strategy includes partnering with developer to build a mixed-use development. Could accommodate up to 10,000 SF of commercial & 50 units of multi-family.
	12521 S Harbor Blvd	Could accommodate new three-story building with up to 30,000 SF of commercial space, including 10,000 SF of retail/restaurant and 20,000 SF of office.
Harbor Blvd (Garden Grove)	13401 S Harbor Blvd	Potential location for quality affordable housing. Property could support up to 50 units of multi-family housing. NeighborWorks OC could work with private developer to finance project.
	13531 S Harbor Blvd	Potential location for quality affordable housing. Property could support up to 100 units of multi-family housing. NeighborWorks OC could work with private developer to finance project.
Harbor Blvd (Santa Ana)	101 N Harbor Blvd	Owned by City of Santa Ana. Reuse strategy includes partnering with a private developer to build a 10-story mixed-use development consisting of 15,000 SF of leasable commercial space & 180 residential units (with 30 units designated as affordable). Development will include onsite parking and outdoor amenities.
	405 N Harbor Blvd	Prime location for mixed-use development. Could accommodate 10-story mixed-use development with up to 20,000 SF of commercial & 200 residential units (40 units designated as affordable). Onsite parking + amenities

1.b.ii. Outcomes & Benefits of Reuse Strategy: Redevelopment will result in an array of **economic benefits**, with a focus on revitalizing Orange County's residential and commercial districts. The table summarizes the estimated amounts of new residential housing units (580), commercial space (175,000 SF), industrial (168,000 SF), office space (20,000 SF), and long-term (non-construction) jobs (392) that will be retained and created. These projects will also result in hundreds of local construction & related supply industry jobs over several years.

The project will also result in an array of **non-economic benefits**.

- Support Adaptive Reuse & Energy Efficiency Projects in all Target Areas: Adaptive reuse projects proposed in all the TAs will highlight historic preservation, infill development, and sustainable building design. These measures include new high-efficiency heating systems, replacement of single pane windows and electrical upgrades. Additionally, our housing partners (identified in Section 2.b) have successfully incorporated renewable energy such as solar and biomass systems, and innovative technologies such as high-efficiency air source heat pumps and electric vehicle charging stations.

- **Climate Adaptation & Mitigation Strategies:** New development in the TAs will align with the 2022 *Extreme Heat Action Plan* – an action plan developed to build community resilience. This plan includes strategies to “Support heat resilient and cooler communities” through investment in heat-resilient transportation infrastructure (such as transit stations that offer natural reprieve from the heat with by maximizing shading), updated building codes to require high-efficiency cooling and air ventilation systems, cool buildings and surfaces that deflect radiation from the sun versus absorbing the heat, and nature-based solutions such as increased tree canopies, parks and natural landscapes to provide more shade and moisture versus heat-generating surfaces.

Priority Site(s)	Housing	Commercial	Industrial	Office	Jobs ^a
2951 E La Palma	—	—	48,000	—	40
1465 N Batavia	—	120,000	120,000	—	200
12401-21 S Harbor	50 (10*)	10,000	—	—	13
12521 S Harbor	—	10,000	—	20,000	58
13401 S Harbor	50*	—	—	—	5
13531 S Harbor	100*	—	—	—	10
101 N Harbor	180 (30*)	15,000	—	—	30
405 N Harbor	200 (40*)	20,000	—	—	36
Totals	580 (230*)	175,000 SF	168,000 SF	20,000 SF	392

*Affordable Housing Units; SF = Square Feet; M-F = Multi-Family

1.c. Strategy for Leveraging Resources.

1.c.i. Resources Needed for Site Reuse: As a local unit of government, OCCOG is eligible and experienced with leveraging funding from a variety of public and private sources. Additionally, as local units of government, OCCOG's Coalition member cities are also eligible for a multitude of local, state and Federal grants. Completing environmental assessments, cleanup planning, and redevelopment planning with this EPA Grant will enable OCCOG to assist the TAs with developing a strategy and unlocking additional resources for cleanup and redevelopment. If additional assessment funds are needed for a particular site, OCCOG or its Coalition members may request supplemental funding from DTSC's Equitable Community Revitalization Grant (ECRG) to complete the work. If cleanup is significant and requires public assistance, DTSC, the County, and/or city and town governments may take a direct role, acquire the site, and pursue an EPA Brownfields Cleanup Grant and/or DTSC Cleanup Grant. In addition to OCCOG's support through studies and economic development activity, the Coalition member cities and the TAs are eligible for the following incentives focused on financing reuse and infrastructure:

- **DTSC, Equitable Communities Revitalization Grant (ECRG):** Should additional assessment or cleanup be necessary, all the TAs are competitive to the selection criteria for these grants.
- **Workforce Housing Opportunity Zones (WHOZ):** WHOZ are available to public entities for increasing affordable housing near jobs and public transportation. They allow local governments to adopt a collective Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA) for the WHOZ.
- **Community Revitalization and Investment Authority (CRIA) (TIF Incentives):** Tool to fund economic development projects within a geographic boundary utilizing tax increment financing. CRIA's are a popular tool being considered at the local level and offer a means to spur new infrastructure, attract new capital deployment, and align public funding resources in a geographic area to support businesses and residents.
- **Enhanced Infrastructure Financing Districts (EIFDs):** Another tool to fund economic development projects within a geographic boundary utilizing tax increment financing.
- **Neighborhood Infill Finance & Transit Improvement Act (NIFTI) Incentives:** Grants cities and counties permission to allow EIFDs to funnel sales and use tax revenues toward affordable housing and supportive transit infrastructure projects. NIFTIs can also fund infill development projects.
- **Strategic Growth Council Affordable Housing and Sustainable Communities Incentives (AHSC):** Program that provides development incentives intended to make it easier for Californians to drive less by making sure housing, jobs, and key destinations are accessible by walking, biking, and transit.

1.c.ii. Use of Existing Infrastructure: The proposed projects are all in-fill revitalization projects. Since all priority sites are located within urban areas, existing infrastructure is fully in place, including roads, water, sewer, power, high-speed internet and telecommunications. It is the goal of our program to fund sites that will cause the least strain on municipal budgets associated with expanding and maintaining a larger infrastructure network.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT.

2.a. Community Need.

2.a.i. The Community's Need for Funding: In May 2023, California Housing Partnership reported that 130,175 low-income renter households in Orange County do not have access to an affordable home. This grant will help meet the needs of a disadvantaged area and advance the assessment of priority brownfields in support of coordinated efforts to develop quality, affordable housing. Demographic data provided in the table below demonstrate how residents in the TAs are economically distressed, with low per capita incomes, higher than average rates of poverty, and a significant percent of children living in

^a Based on data from U.S. Energy Information Administration. *Table B2. Total & medians of floorspace & # of workers, Revised 2016.* Includes 1 job per each of: 10 Multifamily Units; 1,200 SF of Commercial/Industrial; & 400 SF of Office Space.

poverty. Low vacancy rates, 2.8% in Santa Ana and 2.9% in Garden Grove, have contributed to rising rental prices. As a result, all the TAs have cost burdened households – a direct outcome of adults earning low wages combined with a shortage of affordable housing. Most of TAs are home to people of color, identifying primarily as Hispanic/Latino or Asian. For these residents, generational poverty coupled with linguistic isolation have prevented access to higher education and better employment. The need for affordable housing far outpaces the financial resources available to address this immediate issue. Thousands of households are at risk of becoming homeless, and EPA funding will support efforts to create quality fair housing and in-fill development that will increase the tax-base, generate local jobs, and reduce reliance on public assistance.

Data Type	Brownfield Target Area				Orange County	State of California	United States
	East Anaheim TA	Harbor Blvd Santa Ana TA	Garden Grove TAs*	Marlboro TA			
Total Population	779	34,787	38,540	3,624	3.2M	39.5M	330M
People of Color	55.9%	75%	62.7%	37.7%	46.4%	47.9%	31.8%
Hispanic	29.4%	60.9%	57.6%	80.7%	34.0%	39.5%	18.4%
Asian	18.9%	26.5%	27.8%	3.2%	21.3%	14.9%	5.7%
Poverty Rates	4.4%	15.9%	13.0%	15.4%	9.9%	12.3%	12.6%
Children/youth < 18	15.9%	24.2%	23.2%	34.2%	22.0%	22.8%	22.5%
Children/youth < 18 in poverty	0%	19.8%	23.5%	23.3%	12.1%	16.2%	17.0%
Median Household Income	\$74,881	\$66,043	\$80,439	\$69,222	\$100,485	\$84,097	\$69,021
Per Capita Income	\$42,398	\$20,607	\$24,974	\$29,728	\$46,099	\$41,276	\$37,638
Households with Food Stamps/SNAP	5.6%	17.0%	8.7%	16.4%	6.3%	9.5%	11.4%
Cost Burdened Households	59.0%	60.6%	54.2%	54.6%	55.7%	53.2%	49.4%
Home Ownership Rate	0.0%	40.8%	50.4%	28.1%	57.0%	55.5%	64.6%
Median Home Value	N/A	\$342,417	\$539,108	\$553,600	\$738,100	\$573,200	\$244,900
Houses built prior to 1980	8.9%	68.8%	75.0%	68.6%	59.2%	58.2%	52.0%
Vacant Housing Units	9.0%	2.8%	2.9%	8.0%	5.7%	7.8%	11.2%
% High School or Higher	90.9%	64.3%	69.6%	63.0%	86.6%	84.2%	88.9%
% Bachelor's Degree or Higher	39.0%	15.3%	18.4%	22.4%	42.1%	35.3%	33.7%
Land Area (Square miles)	4.23	0.95	0.9	2.53	948	155,812	3.8M

Data from 2017-2021 5yr American Community Survey. **Bold** indicates results that exceed or are less than CA and U.S. Data was prepared for target areas with multiple census tracts using weighted averages to calculate the % or \$.

*Demographics for International West plus Harbor Avenue (Garden Grove) TA.

2.a.ii. Threats to Sensitive Populations

2.a.ii.(1) Health or Welfare of Sensitive Populations:

As shown in Table 2, EPA's Environmental Justice Screening (EJSCREEN) Tool reports the TAs have some of the highest concentrations of sensitive populations in the U.S. With demographic indexes that range between the 65th to 89th percentile, the TAs have large populations of people of color, limited English speaking households, children under the age of five, and low income households. Additional welfare issues in the TAs include:

- **Housing:** The TAs have low rates of homeownership (38.6%), high rates of cost burdened households (57.4%), and an aging housing stock, with 67.6% of homes built before 1980.^b
- **Lack of Education:** Over 30% of residents did not graduate from high school, and less than 20% of residents have a bachelor's degree or higher.^c

Lack of investment in the TAs has resulted in welfare concerns such as homelessness, vagrancy, and a shortage of green space. Critical service gaps in the TA include access to transportation and food. Redeveloping brownfield sites in these areas will further local and state initiatives to provide housing, jobs, and overall well-being for sensitive populations in the TAs.

2.a.ii.(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: Decades of industrial use and proximity to some of the most heavily used thoroughfares in the U.S. have left a legacy of environmental and social impacts resulting in adverse health conditions for residents in the TAs. Data from CEJST ranks all of the TAs between the 95th to 97th percentile for PM2.5 (Particulate Matter) exposure. Long-term exposure to unhealthy levels of PM2.5, a mixture of pollutants from

Table 2. Sensitive Populations Categories (EJ Screen; 11/6/23).	Percentile in U.S.			
	Anaheim TA	Garden Grove TAs	Marlboro TA	Santa Ana TA
Demographic Index	65	83	84	89
Low Income	29	58	67	75
People of Color	76	88	86	91
< high school education	54	92	95	94
Under age 5	51	50	84	60
Limited English-Speaking Households	74	94	89	91

Bold indicates factors ≥ 60th %tile. Shaded indicates factors ≥ 70th %tile.

^b See table in Section 2.a.i.

^c See table in Section 2.a.i.

emissions, has been linked to premature death and reduced lung growth in children.^d Short-term exposures are associated with premature mortality, increased admissions for heart or lung causes, bronchitis, asthma attacks, and restricted activity days. Adverse health effects are primarily reported in infants, children, and adults with preexisting lung or heart diseases. Research shows that children living in communities with high levels of PM2.5 had slower lung growth, and had smaller lungs at age 18 compared to children who lived in communities with low PM2.5 levels.^e With larger than average populations of children living in three of the four TAs, this data is particularly concerning as the consequences of poor air quality is more severe for these smaller, developing bodies. PM2.5 exposures at these levels are likely to set them up for a life time of lung and breathing difficulty, and greatly diminished activity levels and quality of life.

With 67.6% of homes in the target area built before 1980, many, if not all were built before the 1978 US ban on the sale of lead-based paint (LBP) for residents and the 1989 ban on asbestos containing materials (ACM). The presence of regulated building materials (RBM) in homes and structures has been linked to various forms of respiratory disease. Data from the Orange census tract showed levels of asthma at the 65th percentile in California.^f

Exposure to wastewater discharge also ranks high in the target areas. CEJST reports 13 of the 16 CTs in the TAs are above the 93rd percentile in the U.S.^g Wastewater discharge contains bacteria that causes gastrointestinal illnesses and weakens immune systems. Heavy metals are often found in waste water discharge and can cause acute and chronic illnesses such as cancer and damage the liver and kidney. Sensitive populations who live in substandard housing are particularly vulnerable to wastewater discharge as the increased flood risk (above 68th percentile in three of the target areas^h) coupled with heavy rains increases the risk of exposure.

Further, the impacts of financial and housing instability negatively impact overall health. Chronic diseases such as heart disease, cancer, and stroke account for seven in ten deaths in Orange County.ⁱ Residents in the Orange census tract have a greater than average low life expectancy, ranking at the 87th percentile.^j Revitalizing the aging housing stock and focusing on infill development in TOD areas will address the OCCOG's primary goals of increasing the availability of quality affordable housing, reducing emissions by improving public transit access, and improving health outcomes for sensitive populations.

2.a.ii.(3)(a) Identification of Environmental Justice Issues: According to the Climate and Economic Justice Tool (CEJST), 15 of the 16 CTs included in the TAs are classified as disadvantaged. All of the priority sites identified in this grant application are located in disadvantaged CTs. Residents in these communities include low-income adults and families, impoverished children, people with low levels of educational attainment, and linguistic isolation. Data from EPA's EJSCEEN Tool in Table 3 demonstrate exceptionally high environmental burdens. Communities in the TAs have impaired air and water, and live alongside freeways, superfund sites, RMP facilities, hazardous waste facilities, and underground storage tanks. In nearly every category, the TAs outrank all other communities in the U.S. With the high levels of sensitive populations, including children living in poverty, these findings are very concerning. As discussed in 2.a.ii.(2), these conditions elevate the likelihood for residents to experience adverse health conditions. Due to economic and social disparities, it is nearly impossible for residents to find safe and affordable housing, and they are relegated to live in polluted conditions.

2.a.ii.(3)(b) Advancing Environmental Justice: Environmental justice (EJ) is central to OCCOG's brownfield redevelopment strategy. The Coalition specifically selected TAs in low income communities with vulnerable populations who face disproportionate exposure to adverse environmental, economic, and health impacts. All of the TAs have legacy contamination and are located in close proximity to major thoroughfares. EPA funding will support OCCOG and partners in developing sustainable housing and restoring community serving commercial spaces. Assessment and cleanup will also reduce threats to residents from exposure to contaminants from:

Type	Table 3. EJ Screen Indicators (11/6/23)	Percentile in U.S.			
		Anaheim TA	Garden Grove TAs	Marlboro TA	Santa Ana TA
Air	Particulate Matter	98	97	98	93
	Ozone	97	80	94	72
	Diesel Particulate Matter	80	82	82	80
	Toxic Releases to Air	69	70	95	72
	Traffic Proximity	97	97	79	93
	Air Non-attainment	Yes	Yes	Yes	Yes
Hazardous Substances	Superfund	76	71	71	61
	RMP Facility Proximity	83	63	86	49
	Haz. Waste Proximity	99	95	99	96
Petroleum	Underground Tanks	0	82	47	36
Water	Wastewater	88	90	92	93

Bold indicates factors ≥ 60th %tile. Shaded indicates factors ≥ 70th %tile.

^d California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10) [link](#) accessed 11/12/23

^e California Air Resources Board, The Children's Health Study [link](#) accessed 11/12/23

^f EPA EJ Screening Tool, [link](#) accessed 11/12/23

^g Climate and Economic Justice Screening Tool, [link](#) accessed 11/12/23

^h EPA EJ Screening Tool, [link](#) accessed 11/12/23

ⁱ Orange County Health Improvement Plan, 2020-2022, [link](#) accessed 11/12/23

^j EPA EJ Screening Tool, [link](#)

- **Air Emissions:** The TA has air quality issues associated with traffic and industrial facilities. Infill development will help reduce urban sprawl, and consequently vehicle emissions. Adding accessibility to public transit will increase utilization, further decreasing emissions in car reliant Orange County.
- **Hazardous Substances, Petroleum, Soil and Groundwater:** The TAs aging housing stock presents increased risk of exposure to hazardous materials such as ACM and LBP. Residents also live near industrial facilities, former gas stations, auto repair shops, and dry cleaners. Funding will be used to assess contamination and evaluate remedial options. EPA funding will help expand access to affordable housing for low-income residents and those who are, or are on the brink of, experiencing homelessness. Renovation of housing stock that is in disrepair will reduce blight and exposure to RBMs. Infill development and TOD will help increase utilization of public transit and reduce emissions.

2.b. Community Engagement

2.b.i. Project Involvement / 2.b.ii. Project Roles: OCCOG has established a list of community-based partners that will be invited to join a Brownfields Advisory Committee (BAC) to help guide grant implementation and represent the interests of TAs and sensitive populations. Each of these partners will be engaged for input on the site selection, cleanup and/or reuse planning process. Below is a summary of project partners and their roles. Additional partners will be recruited throughout the project.

Organization	Contact Name & Info	Organization Purpose & Project Role
NeighborWorks Orange County (NWOC)	[REDACTED]	Purpose: Affordable housing & homelessness prevention. Role: Coalition member.
City of Garden Grove	[REDACTED]	Purpose: Local government. Role: Coalition member.
City of Orange	[REDACTED]	Purpose: Local government. Role: Coalition member.
City of Anaheim	[REDACTED]	Purpose: Local government.
City of Santa Ana	[REDACTED]	Role: Advise on site prioritization and site reuse options and support economic development.
Center for Demographic Research	[REDACTED]	Purpose: Non-profit research center focused on development & support of demographic research in Orange County. Role: Provide demographic data to support site prioritization for housing/economic development projects. Inform inventory efforts.
Orange County Housing Finance Trust	[REDACTED]	Purpose: Affordable housing & equity investing/lending.
Jamboree Housing Corporation	[REDACTED]	Role: Inform site prioritization and planning efforts to provide diverse, quality and affordable housing in all TAs.
National CORE	[REDACTED]	Purpose: Non-profit affordable housing developer. Role: Inform site prioritization and planning efforts to provide diverse, quality and affordable housing in all TAs.
Orange County Hispanic Chamber of Commerce	[REDACTED]	Purpose: Regional economic development corporation. Role: Enhance local business climate for Hispanic-owned businesses.
Orange County Business Council	[REDACTED]	Purpose: Regional economic development corporation. Role: Enhance local business climate & promote a healthy economy.
County of Orange	[REDACTED]	Purpose: Local government. Role: Advise on site prioritization and site reuse options and support economic development.
Southern California Association of Governments	[REDACTED]	Purpose: Regional planning & economic development. Role: Attract and retain business, address regional planning & economic challenges.
Orange County Transportation Authority	[REDACTED]	Purpose: Transit development. Role: Inform site prioritization & reuse planning for TOD areas.
DTSC	[REDACTED]	Purpose: Protect human health and the environment. Role: Provide technical & funding support.
Orange County Health Care Agency	[REDACTED]	Purpose: Protect health & facilitate disease prevention. Role: Support community outreach; advise on health issues.

2.b.iii. Incorporating Community Input: OCCOG relies on collaboration to further its mission and understands effective engagement is imperative to the success of this project. OCCOG will work closely with its partners to connect with stakeholders and solicit input from them and the community on site selection, assessment, and reuse planning. At the beginning of the project, OCCOG will prepare a Community Involvement Plan (CIP) that will include the following components:

- **Project Webpage:** OCCOG will create a brownfield project webpage on its website to feature information about the grant. The website will include fact sheets, a site nomination form, links to resources, meeting materials, regular updates, and information regarding how to provide feedback. Links to this project webpage will also be added to coalition member

website's as appropriate. Due to the large Latino population, project fact sheets and webpage content will be developed in English and Spanish. Materials will also include a statement that information can be requested in additional formats as needed.

- **Brownfield Advisory Committee (BAC):** As discussed in 2.b.ii, OCCOG will host quarterly BAC meetings to solicit input on site prioritization, assessment, cleanup planning and area-wide planning. The BAC will include representatives from each Coalition member as well as the project partners above. The meetings will include updating our public and private partners on the status of the project, discussing site nominations, soliciting input on site prioritization/selection, and discussing strategies for addressing funding to move cleanup and redevelopment forward. Due to the large geographic footprint of Orange County and it's coalition members, OCCOG will host these meetings via Zoom to allow for engagement from a broad group of stakeholders.
- **Technical Advisory Committee (TAC):** OCCOG's TAC serves as a forum and resource for the planning staff of OCCOG's member agencies to discuss regionally-significant issues and share best practices for addressing issues that impact member agencies. The TAC meets monthly to analyze planning documents prepared as part of the Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS) updates, Regional Housing Needs Assessment (RHNA), and Air Quality Management Plans (AQMP). Additionally, the TAC provides oversight for OCCOG-funded and managed projects such as the Orange County Complete Streets Initiative and the Orange County Aerial Imagery Consortium. Information about the brownfield grant project will be shared at these meetings. Meetings typically include over 30 attendees from our member communities.
- **Virtual & In-Person Community Meetings:** When possible, OCCOG hosts in-person meetings but continues to provide opportunities for remote participation in all meetings to ensure effective engagement for those who cannot attend in person. All community meetings are advertised with information on how to obtain a Zoom link. Two community meetings will be held per year in the TAs. These meetings will include educating the public on the brownfield program, soliciting input on priority sites and reuse plans, and informing the area-wide planning process (further described in Section 3.a). OCCOG employs bilingual community engagement specialists that will attend these meetings and support outreach to the large Spanish-speaking population in the TAs. Additionally, meeting materials will be provided in English and Spanish.
- **Emails & Newsletters:** OCCOG publishes monthly newsletters to a list of 1,152 subscribers that include residents, business owners, community-based organizations and local government representatives. These newsletters regularly feature project updates and will be used to provide updates and solicit input.
- **Social Media:** OCCOG and its partners have established social media channels that will be utilized to ensure community members and stakeholders stay informed and are included in the decision-making process.

Implementing these engagement methods will allow community members and business owners in the TAs to provide meaningful input throughout all phases of the project. Sustained outreach to sensitive populations and translation services will ensure the project concludes with strong community backing. Finally, OCCOG and its partners have access to translation resources and interpreters that will be made available for meetings.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS:

3.a. Description of Tasks/Activities & Outputs: We anticipate the scope described below will be complete in 3 years.

Task 1 – Project Management, Reporting & Other Eligible Activities
i. Project Implementation: OCCOG will oversee consultant activities and manage all aspects of the project in accordance with the terms and conditions established in the Cooperative Agreement (CA) with EPA. At OCCOG's direction, the consultant will assist with compliance reporting (quarterly and final reports, ACRES updates, annual Disadvantaged Business Enterprise [DBE] and Financial Reports, etc.) and other eligible project activities identified in the CA Work Plan. Biweekly check-in meetings will be held with the consultant and Coalition to ensure the project is progressing as planned. We anticipate two OCCOG personnel and one representative from each Coalition member agency will attend one regional and one national brownfields conference.
ii. Anticipated Project Schedule: Activities will be ongoing throughout the project period.
iii. Task/Activity Lead(s): OCCOG with support from the consultant.
iv. Output(s): Quarterly Reports; Final Performance Report; Annual & Final DBE Reports & Federal Financial Reports; prompt ACRES updates; 2 brownfield conferences attended by 6 coalition staff; and biweekly meetings.
Task 2 – Community Engagement & Site Inventory/Prioritization
i. Project Implementation: As described in Section 2.b.iii, a CIP will be developed at the beginning of the project to establish outreach strategies to engage as many community members as possible. The community engagement program (described in 2.b.iii) includes establishing a BAC comprised of Coalition members, local government representatives, CBOs, and business owners. The BAC will meet quarterly to review and prioritize sites nominated for grant funding, inform reuse planning activities, and assist with outreach to sensitive populations and community members in the TAs. Additionally, OCCOG hosts monthly TAC meetings (see 2.b.iii) with its member agencies to discuss planning-related initiatives. Project information will be shared at these meetings. Three public meetings will be hosted per year to provide community

members with an opportunity to inform reuse planning and site prioritization. These meetings will include bilingual engagement specialists and meeting materials in Spanish to be inclusive of the large Latino population in the TAs. OCCOG also anticipates facilitating individual meetings with the consultant and property owners of priority sites to discuss the assessment and cleanup process and review assessment findings. A project-specific webpage will be created on OCCOG's website and will include fact sheets, a site nomination form, meeting materials and project updates. All fact sheets and webpage content will be prepared in English and Spanish. A comprehensive inventory of sites will be developed. Inventory data, combined with a focused AWP (see Task 4 below), will be leveraged to identify catalyst projects that are most likely to spur reinvestment in this area. The inventory will be linked to OCCOG's geographic information system (GIS) to maximize its long-term value as a planning resource.

ii. Anticipated Project Schedule: The CIP will be created during first quarter (1Q). The project webpage and fact sheets will be created by 2Q. The BAC (which includes the Coalition members) and TAC will be convened quarterly with the first meeting during 1Q. Inventory activities will be completed by 3Q.

iii. Task/Activity Lead(s): OCCOG will lead outreach to residents of the TAs with support from the Coalition members and project partners (as in-kind services). OCCOG leads the quarterly TAC meetings. The consultant will assist with facilitating stakeholder, BAC, and public meetings. The Coalition and BAC will lead site prioritization efforts. The consultant will develop/maintain the brownfield site inventory as well as a focused inventory list of all sites nominated and approved for grant funding.

iv. Output(s): CIP, project webpage, 2-3 project fact sheets and site nomination form; ~12 BAC meetings; monthly TAC meetings; ~9 public meetings; ~20 other property owner/stakeholder meetings; Brownfield inventory; Inventory of all sites nominated/approved.

Task 3 – Phase I/II ESAs, RBM Surveys & Site-Specific Cleanup Plans

i. Project Implementation: OCCOG estimates 18-22 sites will be assessed (the final total will depend on the number of sites for which more than one type of activity is performed). OCCOG will prepare Eligibility Determination (ED) requests (with support from the consultant) for sites prioritized by the Coalition and BAC. The consultant will conduct Phase I ESAs for ~18 sites in accordance with the AAI Final Rule and the ASTM E1527-21 Phase I ESA Process. The consultant will complete Phase II ESAs for ~15 sites (it is anticipated this will include 10 standard size properties and 5 large properties) and RBM Surveys for ~10 sites. Prior to initiating sampling or other field investigation activities, the consultant will develop a Master Quality Assurance Project Plan (QAPP) for EPA and DTSC approval. The consultant will also prepare Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) for each site selected for a Phase II ESA and/or RBM Survey. The SAPs will be submitted to EPA for approval prior to fieldwork. The consultant will prepare ABCA/CAP Reports for ~10 sites where contamination is confirmed.

ii. Anticipated Project Schedule: As previously described, we anticipate the project will be complete in 3 years.

Year 1: Master QAPP, 6 Phase I ESAs, 3 Phase II ESAs, 3 RBM Surveys

Year 2: 8 Phase I ESAs, 8 Phase II ESAs, 5 RBM Surveys, 6 Cleanup Plans

Year 3: 4 Phase I ESAs, 4 Phase II ESAs, 2 RBM Surveys; 4 Cleanup Plans

iii. Task/Activity Lead(s): The consultant will lead technical activities at the direction of OCCOG. Site Access will be secured by OCCOG and its Coalition members. An Access Agreement will be developed by OCCOG for this project. OCCOG will prepare ED requests with assistance from the consultant.

iv. Output(s): 18-22 ED requests; 1 Master QAPP; 18 Phase I ESAs; 15 Phase II ESAs; 10 RBM Surveys; 10 Cleanup Plans

Task 4 – Area-Wide Planning (AWP)

i. Project Implementation: The consultant will develop area-wide revitalization plans for two brownfield-impacted areas. AWPs will develop to support advancing redevelopment goals and adaptive reuse of catalyst sites. The AWP scope is anticipated to include market studies, infrastructure evaluations, feasibility studies for sites with redevelopment challenges, and site reuse plans for catalyst sites.

ii. Anticipated Project Schedule: We anticipated the AWPs will complete during the second year of the project.

iii. Task/Activity Lead(s): The consultant will lead all technical activities at the direction of OCCOG.

iv. Output(s): 2 AWP deliverables

3.b. Cost Estimates: Cost estimates for each task are provided below. OCCOG is requesting 2.5% of the grant for indirect costs (\$9,375 per task) for administrative expenses. No other administrative expenses are requested. QEP costs are based on an average rate of \$200/hour. Approximately **76% of grant funds (\$1,138,000 of contractual services) are allocated for environmental assessment and cleanup planning**. As described above, we anticipate the project will be completed in three years.

Task 1: Project Mgmt., Reporting & Other Activities | Total Budget = \$68,675 (\$59,300 Direct + \$9,375 Indirect)

Travel Total = \$22,500

- National Brownfields Conference: \$15,000 (\$2,500/person x 6 [2 OCCOG Staff + 4 Coalition Member Staff])
- State Brownfields Conference: \$7,500 (\$1,250/person x 6 [2 OCCOG Staff + 4 Coalition Member Staff])

(Note: Costs include lodging, meals, airfare, transportation, and incidental expenses.)

Other Total = \$2,400

- Conference Registration Fees: \$2,400 (\$200/person x 6 [2 OCCOG Staff + 4 Coalition Member Staff]) x 2 events)

Contractual Total = \$34,400

- Compliance Reporting (Quarterly Progress Reports, ACRES updates, Final Performance Report, Annual FFRs & DBE Utilization Reports): \$20,000 (100 hours x \$200/hr)
- Biweekly Project Meetings: \$14,400 (24 meetings/yr x 1 hour/meeting x 3 years = 72 hours x \$200/hr)

Indirect Costs = \$9,375 (Administrative Expenses)

Task 2: Community Engagement & Site Prioritization | Total Budget = \$66,575 (\$57,200 Direct + \$9,375 Indirect)

Contractual Total = \$57,200

- BAC Meetings: \$9,600 (4 meetings/year x 4 hr/meeting* x 3 years = 48 hours x \$200/hr)
- Public Meetings: \$9,000 (3 meetings/year x 5 hr/meeting* x 3 years = 45 hours x \$200/hr)
- Property Owner/Stakeholder Meetings: \$6,600 (33 hours x \$200/hr)
- Develop CIP, Project Fact Sheets & Project Webpage Content: \$8,000 (40 hours x \$200/hr)
- Site Inventory/Prioritization: \$24,000 (120 hours x \$200/hr)

**Note: Estimated hours per meeting include time to prepare meeting materials/presentations, attend meetings and prepare notes.*

Indirect Costs = \$9,375 (Administrative Expenses)

Task 3: Site Assessment & Cleanup Planning | Total Budget = \$1,155,375 (\$1,146,000 Direct + \$9,375 Indirect)

Contractual Total = \$1,146,000

- Site Eligibility Forms: \$8,000 (40 hours x \$200/hr)
- Master QAPP: \$10,000 (50 hours x \$200/hr)
- Phase I ESAs: \$6,000 (18 sites x \$6,000/site)
- RBM Surveys: \$150,000 (10 sites x \$15,000/site)
- Phase II ESAs (standard): \$400,000 (10 sites x \$40,000/site)
- Phase II ESA (large sites): \$350,000 (5 sites x \$70,000/site)
- ABCAs/CAPs: \$120,000 (10 sites x \$12,000/site)

Indirect Costs = \$9,375 (Administrative Expenses)

Task 4: Area-Wide Planning | Total Budget = \$209,375 (\$200,000 Direct + \$9,375 Indirect)

Contractual Total = \$200,000

- AWPs: \$200,000 (2 areas x \$100,000/area)

Indirect Costs = \$9,375 (Administrative Expenses)

A summary of the proposed budget for grant funded activities is provided in the table below.

Budget Category	Task 1 Project Mgmt., Reporting & Other Eligible Activities	Task 2 Community Engagement & Site Prioritization	Task 3 Site Assessment & Cleanup Planning	Task 4 Area-Wide Planning	Total
Personnel	\$0	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0	\$0
Travel	\$22,500	\$0	\$0	\$0	\$22,500
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0
Contractual	\$34,400	\$57,200	\$1,146,000	\$200,000	\$1,437,600
Construction	\$0	\$0	\$0	\$0	\$0
Other	\$2,400	\$0	\$0	\$0	\$2,400
Total Direct Costs	\$59,300	\$57,200	\$1,146,000	\$200,000	\$1,462,500
Total Indirect Costs (2.5%)	\$9,375	\$9,375	\$9,375	\$9,375	\$37,500
TOTAL BUDGET	\$68,675	\$66,575	\$1,155,375	\$209,375	\$1,500,000

3.c. Plan to Measure & Evaluate Environmental Progress & Results: The status and estimated completion dates for outputs will be tracked and reported to EPA via Quarterly Reports and ACRES updates. Between meetings and reports, the following outputs will be tracked on a spreadsheet maintained by OCCOG and its consultant: (1) # of sites nominated; (2) # of sites prioritized for funding; (3) # of Phase I ESAs; (4) # of Phase II ESAs; (5) # of RBM Surveys; (6) # of ABCAs/CAPs; (7) # of site reuse plans; and (8) # of community meetings. The anticipated short- and long-term outcomes identified in Section 1.b.ii (# of jobs, # affordable residential units, acres of greenspace created, etc.) will also be tracked and reported to EPA. Additionally, OCCOG will update ACRES property profiles beyond the life of the Grant to fully capture long-term outcomes. OCCOG will track and evaluate the following outcomes: (1) # of sites cleaned up and # of No Further Action (NFA) determinations received from DTSC; (2) # of sites for which off-site risks are identified; (3) # of sites for which property title transfers are facilitated; (4) # of adaptive reuse projects; (5) # of sites and acres redeveloped; (6) # of acres of parks/greenspace created; (7) private investment and other funding leveraged; (8) # of housing units creating; and (9) # of jobs created. By using the

detailed tracking metrics described above, OCCOG will be able to confirm the project is progressing as planned and monitor key performance indicators to address EPA objectives and community goals.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Capacity: OCCOG has a stable of seasoned contract staff that includes planning, business development, community engagement, GIS, accounting, and administrative support staff. As described in 4.b, OCCOG has proven capacity to successfully carry out and manage the programmatic, administrative, and financial requirements of grants similar in size and complexity. OCCOG will be responsible for overseeing the consultant team, reporting to EPA, financial management, BAC and stakeholder engagement, processing brownfield site nominations, coordination with the Coalition and BAC for site prioritization, preparation of eligibility requests, and coordinating site access.

4.a.ii. Organizational Structure: As the Coalition lead, OCCOG will administer the grant and be accountable to EPA for management of the CA and compliance with grant terms and conditions. OCCOG will oversee the consultant who will implement technical activities. As is typical for our large grant projects, OCCOG will use a three-person management team that will oversee all aspects of the project to ensure timely completion of key milestones.

Governance Structure: Immediately following notice of grant award, OCCOG will prepare a Memorandum of Agreement (MOA) to document the roles and responsibilities of each Coalition member and ensure that grant funds will be used to conduct assessments at a minimum of two priority sites within the jurisdiction of each member. OCCOG will use a collective governance structure that includes facilitating monthly check-in calls with all Coalition members to ensure each partner is meaningfully involved in all aspects of the project and that clear internal objectives are established in support of timely and successful expenditure of grant funds. The BAC (see Section 2.b.iii) will convene quarterly and include a representative from each Coalition member as well as other project partners (see Section 2.b.ii) that will guide site prioritization and inform reuse planning activities.

4.a.iii. Description of Key Staff: Descriptions of OCCOG's key personnel and their qualifications are provided below. As previously mentioned, OCCOG's TAC is comprised of planning staff from each of its member communities, including representatives from the Coalition member cities. These staff are available to support OCCOG with planning, GIS and other resources as needed to make this program successful. In addition to our core project management team described below, OCCOG employs a legislative coordinator, business development/marketing consultant, grant coordinators, bilingual communications coordinator, and other staff.

Marnie O'Brien Primmer, Executive Director, OCCOG: Marnie has 25 years of experience in project management. She has served as the Executive Director of the OCCOG since October 2015 and has led the organization through the development and implementation of two strategic plans, and the preparation of three Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS) cycles as well as the Regional Housing Needs Assessment (RHNA) 6th cycle. Marnie served as project principal for the federally-funded Orange County Complete Streets Initiative, via a partnership with the Orange County Transportation Authority which was completed in 2016. She has also served as the Program Manager for OCCOG's \$3.577M Regional Early Action Planning (REAP) Grant Sub-Regional Partnership (SRP) grant program. As part of that grant OCCOG produced a series of eleven housing policy explainer videos, an ADU "How-To" Toolkit, the housingsocal.org website, six model ordinances for housing-related topics, and tools designed to assist jurisdictions to attain the State "pro-housing" designation, prepare their housing elements and monitor progress toward meeting housing goals for the 6th cycle RHNA, as well as immersive 3-D videogame-like walk-throughs of housing projects to assist residents in learning about impending developments in their communities. Prior to joining OCCOG, Marnie served as the Executive Director for Mobility 21, a 501(c)6 non-profit advocacy organization dedicated to securing funding for Southern California transportation priorities, as well as the Executive Director for FuturePorts, a 501(c)6 non-profit charged with bridging the communication gap between the four Southern California Ports and their surrounding communities. She has extensive experience engaging vendors, volunteers, stakeholders, and partners toward common goals and effective outcomes.

Steven Dobrenen, CPA, Treasurer/Controller, OCCOG: For 22 years Steven worked for a regional/ national CPA Firm prior to joining the OCCOG. He audited local governments and non-profit organizations throughout the counties of Orange, Los Angeles, San Bernardino, Riverside, and San Diego. A majority of the entities audited included Federal grants and accordingly required a Single Audit. The following 8 years Steven served as the Finance Manager for the City of Cudahy, located in the South East Region Los Angeles, where he oversaw a General Fund budget of \$10 million along with Special Revenue budgets of \$12 Million. The City of Cudahy received federal funding that was passed through the Los Angeles Community Development Corporation.

Kathryn Morrison, Clerk of the Board, OCCOG: Kathryn has served as the Clerk of the Board in a pivotal role since 2019, demonstrating exceptional leadership and organizational skills in her capacity. In her role, she is responsible for overseeing and orchestrating the crucial functions of the Clerk of the Board, encompassing the preparation of Board agendas,

meticulous documentation of minutes, execution of actions, ordinances, and resolutions, and the vigilant maintenance of official Authority documents and records. Kathryn also plays a pivotal role in conducting Agency elections, ensuring transparency and integrity in the process. Her dedication extends to providing complex administrative support to both the Executive Director and the Authority Board, facilitating seamless operations. Moreover, Kathryn's expertise is not confined to the internal workings of the organization; she actively engages in the development and execution of a comprehensive government relations strategy. She collaborates with legislative bodies, elected officials, state governmental entities, and governmental agencies to advance the Authority's interests. Kathryn excels in establishing and nurturing external relationships with government officials, furthering the pursuit of OCCOG's objectives. Her multifaceted role underscores her commitment to enhancing the Authority's efficacy and its engagement with the broader political landscape.

4.a.iv. Acquiring Additional Resources: OCCOG routinely contracts with consultants and has established equal opportunity procurement procedures for ensuring a fair bidding process. As described in the Threshold Criteria, OCCOG has selected a QEP to lead all technical activities. The QEP was procured in accordance with qualifications-based procurement and compliance with 2 CFR Part 200, 2 CFR Part 1500, 40 CFR Part 33, and EPA's guidance documents (*Best Practice Guide for Procuring Services and Guidance on Competitively Procuring a Contractor*). The QEP will support project management and compliance reporting activities and complete all technical activities. Advanced procurement positions OCCOG for expedited project kick-off upon funding award.

OCCOG promotes strong labor practices and local hiring/procurement by distributing RFPs to local consultants via direct email, advertising RFPs in our newsletter (which has 1,152 subscribers), and sharing RFPs with regional organizations (i.e. Orange County Business Council and Southern California Association of Governments) for distribution to their consultant list. OCCOG's selected QEP includes two consulting firms located in Orange County as well as four Woman-Owned Business Enterprises (WBEs), three Minority-Owned Business Enterprises (MBEs), and two Service-Disabled Veteran-Owned Small Businesses (SDVOSB). The local Disadvantaged Business Enterprise (DBE) contractors will support site inventory, utility locate/geophysical surveys, environmental drilling, analytical laboratory, and waste management services. Additional information regarding our procurement process is included in our Threshold Criteria response (provided as **Attachment A**).

4.b. Past Performance & Accomplishments

4.b.ii. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements: OCCOG is the recipient of Regional Early Action Planning (REAP) Grants from the CA Dept. of Housing and Community Development. The purpose of the program is to help regions and jurisdictions with planning activities to meet the regional housing needs assessment (RHNA) and to spur affordable housing production.

4.b.ii.(1) Purpose & Accomplishments:

- **REAP 1.0 Grant, \$3,577,000 (2019):** OCCOG produced a series of 11 housing policy explainer videos, an Accessory Dwelling Unit (ADU) "How-To" Toolkit, the housingsocal.org website, six model ordinances for housing-related topics, and tools designed to assist jurisdictions to attain the State "pro-housing" designation, prepare their housing elements and monitor progress toward meeting housing goals for the sixth cycle RHNA, as well as immersive 3-D videogame-like walk-throughs of housing projects to assist residents in learning about impending developments in their communities. The outputs have been instrumental in laying the foundation for addressing the housing crisis in Orange County.
- **REAP 2.0 Grant, \$3,151,526 (2023):** REAP 2.0 builds on the success of REAP 1.0, but expands the program focus by integrating housing and climate goals, and allowing for broader planning and implementation investments (including infrastructural investments that support infill development which facilitates housing supply, choice, and affordability). Under REAP 2.0, OCCOG will develop tools and resources to help implement and advance regional plans, primarily including sustainable communities strategies (SCS) as part of Regional Transportation Plans (RTP). An SCS identifies strategies a region intends to pursue towards achieving and maintaining greenhouse gas (GHG) per capita reduction targets through changes to land use and transportation. Outcomes of REAP 2.0 include plans and strategies for accelerating infill and affordable development; supporting residents through realizing multimodal communities; shifting travel behavior through reducing driving; and increasing transit ridership, walking, and biking as primary modes of travel.

4.b.ii.(2) Compliance with Grant Requirements: OCCOG has successfully complied with the terms and conditions of all grant projects. Due to OCCOG's excellent project and grant management efforts, no corrective measures have been required. All deliverables were completed on time and expected results were achieved. Furthermore, OCCOG has an excellent track record of adhering to project work plans, schedules, budgets, and terms/conditions on all grant projects. OCCOG is committed to completing compliance reporting on time and in accordance with agency requirements. Due to the exceptional performance of OCCOG under the REAP 1.0 Grant, they were awarded a REAP 2.0 Grant that is currently underway.

ATTACHMENT A

Threshold Criteria Responses

1. APPLICANT ELIGIBILITY:

1.a. Applicant Type: The Orange County Council of Governments (OCCOG) is an intergovernmental agency established in 1997 by the authority of the Joint Exercise of Powers Act, Chapter 5 of Division 7 of Title 1 (commencing with Section 6500) of the California Government Code. By agreement among its members, OCCOG has all the rights and privileges granted to a “general purpose unit of local government” as defined in 2 CFR 200.64. A copy of OCCOG’s Bylaws are provided as Attachment B.

1.b. Federal Taxation Exemption Status: Not applicable. (OCCOG is not a 501(c)(4).)

2. NUMBER & ELIGIBILITY OF NON-LEAD COALITION MEMBERS: Below we provided the information requests for the non-lead coalition members.

- **NeighborWorks Orange County** (*Legal Name: Neighborhood Housing Services of Orange County, Inc.*)
 - Participant Type: Community-based nonprofit with 501(c)(3) status.
 - Eligibility Confirmation: Documentation of tax-exempt status under section 501(c)(3) of the Internal Revenue Code is provided as Attachment C. As a 501(c)(3) nonprofit organization, NeighborWorks is an eligible coalition member.
- **City of Orange**
 - Participant Type: City
 - Eligibility Confirmation: As a unit of local government, the City of Orange is an eligible coalition member.
- **City of Garden Grove**
 - Participant Type: City
 - Eligibility Confirmation: As a unit of local government, the City of Garden Grove is an eligible coalition member.
- **City of Santa Ana**
 - Participant Type: City
 - Eligibility Confirmation: As a unit of local government, the City of Santa Ana is an eligible coalition member.

3. TARGET AREAS: The Target Area (TA) for each Coalition member represents a distinct census tract (CT) within Orange County where brownfield revitalization efforts will be focused. The TAs are described in Part 4 of the Narrative Information Sheet, Section 1.a.ii and 1.a.iii of the narrative, and below. Per EPA requirements, the target areas do not overlap.

Target Area Name	Census Tract Number	Priority Site Address(es)
Orange County Council of Governments (Lead Coalition Member)		
East Anaheim	6059011714	2951 E La Palma, Anaheim (@ Red Gum St)
NeighborWorks Orange County (Coalition Member #1)		
Harbor Boulevard (Garden Grove)	6059088501	13401 S Harbor Blvd, Garden Grove (@ Garden Grove Fwy)
	6059089003	13531 S Harbor Blvd, Garden Grove (SW Corner @ Trask)
City of Garden Grove (Coalition Member #2)		
International West	6059088402	12401-21 S Harbor Blvd, Garden Grove (N of Lampson)
	6059088502	12521 S Harbor Blvd, Garden Grove (SW Corner @ Lampson)
City of Orange (Coalition Member #3)		
Marlboro Neighborhood	6059076204	1465 N Batavia St, Orange
City of Santa Ana (Coalition Member #4)		
Harbor Boulevard (Santa Ana)	6059089105	101 N Harbor Blvd, Santa Ana (NE Corner @ 1st) 405 N Harbor Blvd, Santa Ana (SE Corner @ 5th)

4. EXISTING BROWNFIELDS GRANTS TO NON-LEAD MEMBERS: None of the non-lead coalition members have an open Brownfields Multipurpose, Assessment, Revolving Loan Fund or Cleanup Grant.

5. COALITION AGREEMENT: Letters of commitment confirming the membership of NeighborWorks Orange County, City of Orange, City of Garden Grove and City of Santa Ana in the Coalition are provided as **Attachment D**. Following grant award, OCCOG will prepare a Memorandum of Agreement (MOA) to document the roles and responsibilities of each coalition member.

6. COMMUNITY INVOLVEMENT: OCCOG relies on collaboration to further its mission and understands effective engagement is imperative to the success of this project. OCCOG will work closely with its partners to connect with stakeholders and solicit input from them and the community on site selection, assessment, and reuse planning. At the beginning of the project, OCCOG will prepare a Community Involvement Plan (CIP) that will include the following components:

- **Project Webpage:** OCCOG will create a brownfield project webpage on its website to feature information about the grant. The website will include fact sheets, a site nomination form, links to resources, meeting materials, regular updates, and information regarding how to provide feedback. Links to this project webpage will also be added to coalition member website's as appropriate. Due to the large Latino population, project fact sheets and webpage content will be developed in English and Spanish. Materials will also include a statement that information can be requested in additional formats as needed.
- **Brownfield Advisory Committee (BAC):** As discussed in 2.b.ii, OCCOG will host quarterly BAC meetings to solicit input on site prioritization, assessment, cleanup planning and area-wide planning. The BAC will include representatives from each Coalition member as well as the project partners above. The meetings will include updating our public and private partners on the status of the project, discussing site nominations, soliciting input on site prioritization/selection, and discussing strategies for addressing funding to move cleanup and redevelopment forward. Due to the large geographic footprint of Orange County and it's coalition members, OCCOG will host these meetings via Zoom to allow for engagement from a broad group of stakeholders.
- **Technical Advisory Committee (TAC):** OCCOG's TAC serves as a forum and resource for the planning staff of OCCOG's member agencies to discuss regionally-significant issues and share best practices for addressing issues that impact member agencies. The TAC meets monthly to analyze planning documents prepared as part of the Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS) updates, Regional Housing Needs Assessment (RHNA), and Air Quality Management Plans (AQMP). Additionally, the TAC provides oversight for OCCOG-funded and managed projects such as the Orange County Complete Streets Initiative and the Orange County Aerial Imagery Consortium. Information about the brownfield grant project will be shared at these meetings. Meetings typically include over 30 attendees from our member communities.
- **Virtual & In-Person Community Meetings:** When possible, OCCOG hosts in-person meetings but continues to provide opportunities for remote participation in all meetings to ensure effective engagement for those who cannot attend in person. All community meetings are advertised with information on how to obtain a Zoom link. Two community meetings will be held per year in the TAs. These meetings will include educating the public on the brownfield program, soliciting input on priority sites and reuse plans, and informing the area-wide planning process (further described in Section 3.a). OCCOG employs bilingual community engagement specialists that will attend these meetings and support outreach to the large Spanish-speaking population in the TAs. Additionally, meeting materials are provided in both English and Spanish.
- **Emails & Newsletters:** OCCOG publishes monthly newsletters to a list of 1,152 subscribers that include residents, business owners, community-based organizations and local government representatives. These newsletters regularly feature project updates and will be used to provide updates and solicit input throughout the project.
- **Social Media:** OCCOG and its partners have established social media channels that will be utilized to ensure community members and stakeholders stay informed and are included in the decision-making process.

Implementing these engagement methods will allow community members and business owners in the TAs to provide meaningful input throughout all phases of the project. Sustained outreach to sensitive populations and translation services will ensure the project concludes with strong community backing. Finally, OCCOG and its partners have access to translation resources and interpreters that will be made available for meetings.

7. EXPENDITURE OF EXISTING GRANT FUNDS: OCCOG does not have an open EPA Brownfields Assessment or Multipurpose Grant nor have we ever been awarded these grants.

8. CONTRACTORS AND NAMED SUBRECIPIENTS:

8.a. Contractors: OCCOG completed a fair and open public procurement process in accordance with 2 CFR Part 200, 2 CFR Part 1500 and 40 CFR Part 33 to obtain the services of a Qualified Environmental Professional (QEP) team. Below is the information requested:

- **Request for Proposals (RFP) Advertising Process:** The RFP was posted on OCCOG's website, advertised in the OCCOG's newsletter (which includes 1,152 subscribers), sent via direct email to five consulting firms, and sent to two regional organizations (Orange County Business Council and Southern California Association of Governments) for distribution to their consultant lists.
- **RFP Response Period:** The RFP was advertised for 30 days (from Sept. 26, 2023 through Oct. 26, 2023). A copy of the RFP is provided as **Attachment E**.
- **Inquiries & Responses Received:** OCCOG received inquiries about the project and RFP from two firms. One proposal was received and scored by OCCOG's selection committee.
- **Firm Selected:** A QEP team led by Montrose Environmental Solutions, Inc. was selected to provide grant application and implementation services. The team includes environmental professionals, urban planners, and real estate strategists based in Orange County. Additionally, the team includes four Woman-Owned Business Enterprises (WBEs), three Minority-Owned Business Enterprises (MBEs), and two Service-Disabled Veteran-Owned Small Businesses (SDVOSB). The local Disadvantaged Business Enterprise (DBE) contractors will support site inventory, utility locate/geophysical surveys, environmental drilling, analytical laboratory, and waste management services. A copy of the executed contract is provided as **Attachment F**.

8.b. Subrecipients: Not Applicable. (No subrecipients are named.)