



CITY of THE DALLES

313 COURT STREET
THE DALLES, OREGON 97058

City of The Dalles Narrative Information Sheet

(541) 296-5481
FAX (541) 296-6906

RE: FY2024 EPA Brownfields Community-Wide Assessment Grant Application

1. Applicant Identification:

City of The Dalles
313 Court Street
The Dalles, Oregon 97058

2. Funding Requested:

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

3. Location:

This project proposes to serve the community of City of The Dalles, located in Wasco County, Oregon.

4. Target Area and Priority Site Information:

- **Target Areas:**
 - Westside Target Area: This target area is comprised of portions of the following census tracts: 41065970500 and 41065970400.
 - Downtown Target Area: This target area is substantially comprised of census tract 41065970200.
- **Priority Sites:**

Table 1 Address	Size (acres)	Former Use	Contaminants of Concern
Western Portion of Westside Target Area			
1. 1915 W. 10th	7.36	County Road Shops	Petroleum, Degreasing Solvents
2. 3718 W. 13th	16.3	Chenowith Middle School	Asbestos and Lead-Based Paint
3. 816 Chenowith Loop Road	1.73	Grocery Store (has been vacant for 10+ years)	Asbestos and Petroleum from nearby former gas station
4. 1252 W. 6th	2.49	Dry Cleaner	Tetrachloroethene
5. 1014 W. 6th	0.32	Retail Gas Station	Petroleum, Degreasing Solvents
Eastern Portion of Westside Target Area			
1. 2400 River Road	35	Landfill and Aluminum Plant	Petroleum and Haz. Substances
2. 1206 W. 2nd	2.21	Truck Service and Repair	Petroleum, Degreasing Solvents
3. 215 Terminal Avenue	1.40	Petroleum Bulk Terminal	Petroleum
4. 1315 W. 2nd	2.66	Petroleum Bulk Terminal	Petroleum
5. 2812 W. 2nd	0.67	Retail Gas Station	Petroleum, Degreasing Solvents

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Table 1 Address	Size (acres)	Former Use	Contaminants of Concern
Historic Downtown District Target Area			
1. 308-310 E. 2nd	0.13	Men's Clothing Store	Asbestos and Lead-Based Paint
2. 421-423 E. 2nd	0.14	I.O.O.F. Lodge	Asbestos and Lead-Based Paint
3. 209 E. 2nd	0.16	Hotel	Asbestos and Lead-Based Paint
4. 200 E. 2nd	0.06	Hotel	Asbestos and Lead-Based Paint

5. Contacts:

(a) Project Director:

Name: Dan Spatz, Economic Development Officer
 Phone: (541) 340-9883 | Email: dspatz@ci.the-dalles.or.us
 Mailing Address: 313 Court Street, The Dalles, Oregon 97058

(b) Chief Executive/Highest Ranking Elected Official:

Name: Matthew Klebes, City Manager
 Phone: (541) 296-5481 | Email: mklebes@ci.the-dalles.or.us
 Mailing Address: 313 Court Street, The Dalles, Oregon 97058

6. Population: 15,942

7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	-
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	-
The priority 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).	1
The priority 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.	-
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.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area(s).	9
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	-

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8. Letter from the State or Tribal Environmental Authority:

A letter of acknowledgement from the Oregon Department of Environmental Quality is provided in Attachment A.

9. Releasing Copies of Applications:

Not Applicable

**Narrative Information Sheet
Attachement A**



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Eastern Region Bend Office
475 NE Bellevue Drive, Suite 110
Bend, OR 97701
(541) 388-6146
FAX (541) 388-8283
TTY 711

November 8, 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 for the City of The Dalles Application for an EPA Community-Wide Assessment Brownfield Grant

Dear Terri Griffith:

The Oregon Department of Environmental Quality is pleased to acknowledge and support The Dalles Community-Wide Assessment EPA Brownfield Grant application. If awarded, the grant will support the assessment/investigation, cleanup planning, and redevelopment efforts in the historic downtown and westside of The Dalles that include at least ten high-priority sites consisting of former gas stations and dry cleaners.

The City of The Dalles has experience with successful EPA Brownfield grant management and implementation. In FY2020, EPA awarded The Dalles with a \$600,000 EPA Brownfield Coalition Assessment Grant that supported a variety of community engagement, site investigation, and cleanup planning activities. DEQ supported grant efforts by providing general technical assistance and project management oversight for site-specific assessments. DEQ will continue to support the city's brownfield assessment and redevelopment efforts, which includes completing at least ten Phase I and Phase II assessments, six remedial action/reuse plans, one area-wide plan and conducting three public meetings.

DEQ encourages EPA to fund the \$500,000 The Dalles EPA Brownfield Community-Wide Grant application. Please contact Greg Svelund, DEQ Eastern Region Regional Solutions Center representative at 541-647-4194 with any questions.

Sincerely,

Ann M. Farris

Ann M. Farris
Program Manager
Cleanup, Emergency Response, and Hydrogeology Program, Eastern Region

ecc Katie Daugherty, ER Brownfields Coordinator
Greg Svelund, ER Brownfield Coordinator
Rebecca Wells-Albers, HQ Brownfields Coordinator
Margaret Olson, EPA R10 Project Officer
Dan Spatz, The Dalles
Dale McCabe, The Dalles
Len Farr, Stantec

**City of The Dalles, Oregon - Brownfield Program
FY2024 EPA Brownfield Community-Wide Assessment Grant Application**

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields: 1.a.i. Overview of Brownfield Challenges and Description of Target Area: The City of The Dalles (City, pop. 15,942) is in north central Oregon adjacent to and south of the Columbia River (the second largest river in the US), which is the boundary between the states of Oregon and Washington. The Dalles was incorporated in 1857, making it one of the oldest cities in Oregon. Today, the City serves as a regional center for the five-county Mid-Columbia Region. Principal economic activities in the region include agriculture, tourism, manufacturing, tech, healthcare, and renewable energy. The growth of The Dalles is significantly and uniquely constrained by its location within the Columbia Gorge National Scenic Area (NSA). The NSA Act does not include clear and objective standards for amendments to the NSA boundary. As a result, the City is unable to expand its urban growth boundary (UGB). Thus, any City growth must occur through infill development and many of the available infill sites are brownfields.

The City's two target areas are: 1) The Dalles Westside, which covers an area of 2.9 square miles (41% of City), has a population of 5,048, and is roughly coincident with census block group (BG) 1 of census tract (CT) 9704 and BG 2 of CT 9705; and 2) Downtown Historic District which covers an area of 0.5 square miles (7% of City), has a population of 1,107, and is roughly coincident with BG 2 of CT 9702.

The Westside Target Area is bound by the City UGB to the west and north, the Columbia River to the east, and Cherry Heights Road to the south. Interstate 84 (I-84) runs north-south through the center of the target area. West of I-84, land use is a mix of corridor commercial and residential. Brownfields in this area are adjacent to residences exposing the underserved living close to commercial corridors to contaminants, blight, and reduced property values. East of I-84, land use consists of industrial lands that serve as the principal employment center in The Dalles. With a shortage of employment lands due to the NSA, redevelopment of brownfields in this area is critical to economic/job growth.

The Downtown Historic District Target Area was added to the National Register of Historic Places in 1986 and contains 46 historic buildings built between 1860 and 1938. Downtown is the City's central business district and is home to many retail businesses and restaurants but has very few residential units. Brownfields in this area keep business patrons (locals and tourists) away and decrease property values. Revitalization of our downtown will create jobs, increase the number and density of housing units, reduce commute times and associated greenhouse gases, and create a vibrant walkable central city that will attract people to live and work in our community.

1.a.ii. Description of the Priority Brownfield Sites: In the western portion of the Westside Target Area there are ~50 brownfields, including 35 sites with environmental database listings. There are three former gas stations, two former dry cleaners, and other miscellaneous light industrial/ commercial sites. On average, brownfields in the western portion of the Westside Target Area are <1 acre in size. Two of the highest priority sites in the western portion of the Westside Target Area are described below.

County Road Shops/Kramer Fields: This 30-acre brownfield is comprised of a former gas station, an undeveloped former armory site (armory was demolished 10 years ago), former Wasco County Road Shops facility (vacant for 30+ years), and athletic fields that are in poor condition and rarely ever utilized. Contaminants of concern (COCs) include petroleum and solvents associated with auto fueling and maintenance. This site is under consideration for a new hospital/medical campus, as the current hospital in The Dalles is antiquated (65 years old) and of insufficient size to serve community needs.

Chenoweth Middle School: This former school property has been vacant for 15 years. COCs include asbestos, lead-based paint, polychlorinated biphenyls (PCBs) and mercury. The vision for reuse of the school building is a regional childcare and early learning center. The lack of available childcare facilities has long been recognized as an economic development barrier in The Dalles.

In the eastern portion of the Westside Target Area there are an estimated 65 brownfields, including 50 sites with environmental database listings. There are numerous former gas stations and bulk terminals, and former auto/truck service facilities along West 2nd Street. This area also has multiple brownfields on the shores of the Columbia River including the former Tidewater Oil Bulk Plant and Columbia Marine Shipyard sites. Brownfields along West 2nd Street are typically 1-3 acres in size, while those east of West 2nd Street are typically 5-10 acres in size. Two of the highest priority brownfield sites in the eastern portion of the Westside Target Area are described below.

2400 River Road: This site was formerly occupied by a small municipal landfill, and the southernmost portion of an aluminum plant. COCs include metals, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs) and petroleum. This site has been identified as a potential location for new athletic fields to replace the fields lost should a new hospital be constructed on the Kramer Fields property.

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West 2nd Street Bulk Terminals: Eight petroleum bulk terminals formerly were located in a 15-acre area bound by West 2nd Street to the south and Webber Street to the west. COCs include primarily petroleum. This significantly underutilized area is proximal to the City’s commercial core, has better transportation accessibility than most of the area east of I-84, and has substantial potential for family-wage job creation. Two of these eight sites are listed in the table of high priority brownfields below.

The Downtown Target Area has been identified because the community has prioritized the creation of a thriving downtown district. COCs include petroleum from heating oil tanks, and asbestos and lead-based paint in buildings. The addition of housing units in the district is viewed as key to its revitalization, and reuse of the long vacant upper floors of historic downtown buildings is a means to create new housing and revitalization simultaneously. In 2013, the City passed a vertical housing tax credit ordinance to promote upper floor revitalization. It provides up to 10 years of tax abatement for 2nd story and above housing units. There are more than 20 downtown buildings with vacant upper floors. Four of the highest priority buildings are listed in the table below.

Information for 14 high priority target area brownfields is summarized in Table 1 below.

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1.a.iii. Identifying Additional Sites: The Westside was selected as a target area because the revitalization of brownfields in the area will directly benefit a disadvantaged neighborhood¹. Brownfield revitalization in other project areas can also directly and indirectly benefit this disadvantaged community.

Prioritization criteria have been developed to aid in selecting additional brownfield sites outside the target areas that if revitalized will still benefit the disadvantaged Westside community. Most of these criteria prioritize sites that can support specific needs identified in the Westside Target Area, and that will stabilize neighborhoods with jobs and housing to prevent displacement. These criteria include:

- Family wage job creation
- Proximity to disadvantaged areas
- Social services facilities
- Basic services such as grocery and pharmacy
- Housing, particularly affordable housing
- Health care facilities
- Childcare and early learning facilities
- Recreational spaces

1.b. Revitalization of the Target Areas: 1.b.i. Reuse Strategy and Alignment with Revitalization Plans:

Definitive site-specific reuse strategies have been developed for 1915 West 10th (mental health crisis center), 3718 West 13th (early learning center/childcare), and 816 Chenowith Loop Road (affordable housing). Consistent with the residential and commercial zoning, the projected reuse of other western Westside Target Area brownfields would be similar, and include multi-family residential, retail/commercial, and mixed use.

The reuse strategy for eastern Westside Target Area brownfields, which are zoned either commercial/light industrial or industrial, is principally to create shovel-ready sites for micro-manufacturing development². Following the permanent closure of the Northwest Aluminum Smelter in 2001 and the loss of 500 family-wage manufacturing jobs, the primary local and regional economic base

¹ Climate and Economic Justice Screening Tool

² 2015 Port of The Dalles Strategic Plan

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relied upon traditional agriculture, food manufacturing, and tourism, but in recent years, an increase in economic diversity in the form of data centers and unmanned aerial systems (UAS) engineering/manufacturing has occurred. This trend is viewed very favorably as these industries bring diverse family-wage jobs to the community. Eastern Westside Target Area brownfields are ideally suited for the siting of data centers, UAS engineering/manufacturing, and supporting industries.

The reuse strategy for the Downtown Target Area is to create a central business district with an abundance of office jobs and retail stores during the day, and a vibrant neighborhood for locals and visitors in the evening and on weekends. To support this vision, the City aims to increase the number of residential units in the area. The City created a Vertical Housing Zone downtown to incentivize the construction of new multi-story residential buildings, and the repurposing of the many long-vacant 2nd-stories of historic downtown buildings. The projected reuse of the priority brownfields identified in Section 1.a.ii is 2nd-story residential. For example, in 2020, nine Class A apartments were constructed in the 2nd-story of the 110-year-old Honald Building, and these units have had nearly 100% occupancy since opening.

These target area reuse strategies are consistent with City land use plans, and with the five focus areas identified in the City's recently completed Vision 2040 initiative. Every 10 years the Vision Action Plan is updated to reflect current community views and opportunities for the future. The following focus areas are identified in the plan: 1) Enhancing education; 2) Creating economic vitality; 3) Providing recreation space; 4) Strengthening and sustaining community life; and 5) Improving governance and infrastructure³.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The primary economic development outcomes and benefits of the proposed project will include: 1) development of attainable workforce housing, primarily residential over commercial (mixed use) in the Downtown and the western Westside Target Areas; and 2) resolving environmental barriers on employment/industrial land for new and expanding businesses with family-wage jobs. Project outcome goals include overcoming brownfield barriers for:

- 25 acres of eastern Westside Target Area industrial land. Assuming a typical industrial employment density of 8 jobs per acre⁴, this would facilitate the creation of 200 family-wage jobs.
- 5 acres of western Westside Target Area land for mixed-use development. Assuming a typical commercial employment density of 14 jobs per acre, this would create 70 jobs, and assuming two stories of residential above commercial (20 units per acre), 100 units of housing.
- Repurposing of the upper floors of five historic downtown buildings, creating an estimated 35 new units of housing downtown.

This project will prioritize the underserved members of the City by ensuring they benefit the most from this reuse strategy. To accomplish this, we will strive to: 1) locate new jobs near areas where our underserved residents live (such as the Westside Target Area), shortening commute times; 2) ensure that many of the new units of housing are affordable; and 3) ensure that revitalization does not result in the displacement of the underserved community.

A specific high priority community initiative is to replace the 64-year-old hospital in The Dalles. The current hospital is outdated and costly to maintain. The new hospital vision includes a campus comprised of a 3-story medical office building, 5-story hospital, 2-story cancer center, and single-story behavioral health center. Use of the Kramer Fields property, which is comprised of ball fields and multiple adjoining brownfield sites (including 1915 West 10th), has been proposed as the location for this new medical campus. This project could help make this new medical campus a reality by assessing the Kramer Fields property, aiding in finding a location for replacement ball fields, and in creating and implementing a reuse vision for the old hospital facilities.

Brownfield assessment and mitigation will be used in partnership with urban renewal and historic preservation funds to rehabilitate aging housing stock downtown, including upper story residential. By refocusing housing downtown, we reduce carbon footprint by reducing traffic volume and commute times. By rehabilitating existing buildings, we conserve resources and reduce carbon footprint by 1) reducing demand for concrete (which produces CO₂ during manufacture), 2) reducing landfill waste, and conserving original framing materials (contributing to carbon sequestration).

Oregon is in the top 10 wind energy producing states in the US, and the vast majority of Oregon's and Washington's 2,165 wind turbines (that generate 4,714 megawatts of power⁵) are located within 75

³ The Dalles Vision 2040

⁴ OR Department of Land Conservation and Development Industrial and Other Employment Lands Analysis Guidebook

⁵ <https://eerscmap.usgs.gov/uswtodb/viewer/#9/45.6571/-120.1649>

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miles of The Dalles. The community has made significant investments in wind technician workforce training including a Skill Center at Columbia Gorge Community College (CGCC). These investments make The Dalles a better place to locate a business due to the presence of a skilled workforce.

1.c. Strategy for Leveraging Resources: 1.c.i. Resources Needed for Site Reuse: The Dalles brownfield program has the track record and plans to leverage funds. Past efforts have included seed money from Business Oregon in 2018: a \$25K Integrated Planning Brownfield Grant was used to fund a brownfield inventory. The City applied for and received a FY2020 EPA Coalition Assessment Grant, which has been instrumental to brownfield program continuation and success. During FY2020 grant implementation, the City has had substantial success in leveraging other resources including: 1) \$60K in funding from Business Oregon for asbestos cleanup of a Wasco County-owned building; 2) \$60K in funding from Business Oregon for an archeological assessment, and \$500K in urban renewal agency funding for building demolition for the downtown Tonys Building; 3) \$40K in funding from the urban renewal agency for demolition of a blighted building at 800 East 2nd Street; 4) \$60K in Business Oregon funding for the former County Road Shops facility; and 5) \$1.7M in funding from the American Rescue Plan Act for the Chenoweth Middle School property. Our work over the last several years demonstrates our ability to leverage funding from other resources for site revitalization.

The City intends to apply for a \$200K 2024 Oregon Department of Transportation Growth Management (TGM) grant. TGM grants help local jurisdictions plan for streets and land leading to more livable, sustainable, and economically vital communities. The work completed under this grant will be performed in the Westside Target Area and will be instrumental in developing an overall vision and strategy for its revitalization.

Other sources of brownfield revitalization funding and incentives that the City will leverage include: 1) the Westside Target Area is designated as an Opportunity Zone, incentivizing revitalization investment through capital gains tax breaks; 2) both the Westside and Downtown Target Areas are designated as Enterprise Zones, incentivizing new business investment by abating all local property taxes for a number of years; 3) the Downtown Target Area is designated as a Vertical Housing Zone, incentivizing new multi-story housing and the repurposing of vacant historic building upper floors by providing an up to 80% property tax exemption for up to 10 years; 4) the Columbia Gateway Urban Renewal Area comprises most of the Downtown Target Area, enabling urban renewal direct investment in subject properties; 5) the Oregon legislature recently authorized local governments to provide property tax exemptions of up to 75% of high-priority brownfield site cleanup costs; 6) North Central Oregon Revolving Loan Fund, which provides flexible loans for attainable housing projects; 7) Port of The Dalles employee creation credit (\$2,500/new employee) and flexible financing program; and 8) the State of Oregon Main Street Program, which offers grants of up to \$200K to facilitate downtown revitalization that will lead to private investment. Listing of the Downtown Historic District on the National Register of Historic Places also provides access to historic preservation-related grant funds including the following: 1) Preserving Oregon and Diamond in the Rough grant offered by Oregon State Parks; 2) the Kinsman Foundation, which offers historic preservation grants; 3) the Ford Family Foundation Vital Rural Communities grant program; and 4) the National Trust for Historic Preservation, and more.

1.c.ii. Use of Existing Infrastructure: Both target areas are fully served by utilities, bridges, culverts, roads, trails, parks, and stormwater management infrastructure. Existing target area infrastructure is of sufficient quality and capacity to handle a significant increase in development density. While transportation, water, sewer, and stormwater master plans have indicated a need for infrastructure capacity improvements to support growth, these are generally located outside the Westside and Downtown Target Areas. The downtown street grid consists of blocks 320 feet (east-west) by 250 feet (north-south) with east-west central alleyways. Both angle-in and parallel parking are generally available on all streets. This transportation/parking configuration has substantial capacity for development density increases. Significant investment in broadband capacity in The Dalles was made several years ago, creating a 33-mile fiber optic loop through the City to enhance economic development efforts with a reliable and cost-effective fiber network. The local power purveyor, Northern Wasco County Public Utility District recently made significant infrastructure investments including sub-stations and smart meters and offers all customers the option to purchase 100% renewable electricity.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a Community Need: 2.a.i. The Community's Need for Funding: The region and project area are rural in nature as shown in Table 2. With a very small population base, tax revenues used to fund local government and schools are very limited. Low tax revenues are further exacerbated by the following: 1) no state or local sales tax; 2) state legislation (Measures 5, 47, and 50) that limits increase in property

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assessed values to 3% annually despite much more rapidly increasing market rates thereby reducing property tax revenue; and 3) 38% of land in Wasco County generates no property taxes because it is tribally (Warm Springs Reservation) or publicly owned. 29% of the City's budget is sourced from

Table 2	Target Areas	The Dalles	Oregon	US
Population ⁶	5,048	15,942	4.2 M	330 M
Low Income ⁷	46%	37%	29%	31%
Median Household Income ⁶	\$36,766	\$56,598	\$71,562	\$67,521
Cost Burdened Renters ⁵	46.7%	45.7%	53.2%	51.9%
Severely Cost Burdened	27.7%	25.0%	23.9%	22.9%
Labor Force Participation	57.7%	61.7%	62.4%	63.5%
Unemployment Rate ⁶	5.5%	4.5%	2.7%	2.7%

property taxes. The City receives far lower than average income tax revenues due to below average median household income, and high housing costs (45.7% of residents in The Dalles pay more than 30% of their income for housing). These factors also indicate lower disposable income, which results in less spending, hurting the revenue of local businesses that pay business taxes.

This information demonstrates insufficient tax revenues to allocate funding to brownfield redevelopment in a meaningful way. Even though times have generally been good in recent years, local government tax revenues have not increased, and it continues to be a struggle to fund essential public safety functions and ever-growing public infrastructure maintenance costs.

2.a.ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: As indicated in Table 3, there are disproportionate minority, veteran, disabled, elderly, children, and/or public assistance users in the project and target areas. Some of the most striking statistics are the number of households receiving public assistance and the high number of minority, veteran, and disabled individuals. 68% of The Dalles primary and secondary education students are receiving Supplemental

Table 3	Target Areas	The Dalles	Oregon	US
18 Years and Younger ⁶	25.8%	24%	20%	21.7%
65 Years and Older ⁶	17.6%	19%	19%	17.3%
Minority Population ⁶	29.4%	25%	28%	24.5%
Veteran Population ⁶	11.2%	10.2%	7.4%	5.2%
Disabled Population ⁶	No BG data	18.8%	14.3%	13%
Received Public Assist. in Last 12 Months ⁶	5.8%	5.1%	3.6%	2.5%

Nutrition Assistance Program assistance (free/reduced price meals)⁸. Nearly one in four people in the region are going without basic needs (income, food, housing, transportation, and/or health insurance).

The sensitive populations indicated above are impacted

directly and indirectly by brownfields every day. The target areas encompass commercial areas that are frequented by these sensitive populations as they access the goods and services of everyday life. As a result, they are exposed to the contaminants present on brownfields on a nearly daily basis. These sensitive populations are more likely to live adjacent to brownfields due to depressed property values and rents and as a result experience more exposure to brownfield contamination and the socio-economic issues associated with brownfields such as crime causing mental distress and associated anxiety and high blood pressure.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Chronic disease data for the project and target areas obtained from EJSscreen indicate nearly across the board greater than normal incidence of disease and adverse health conditions, as indicated by the percentile data in Table 4.

Table 4	Westside TA		Downtown TA		The Dalles	
	Oregon	US	Oregon	US	Oregon	US
Low Life Expectancy	93	84	82	70	82	70
Heart Disease	88	87	43	39	75	72
Asthma	81	85	66	79	59	75
Cancer	75	84	33	41	68	78
Persons with Disabilities	90	93	88	91	75	81
Wildfire Risk	94	91	97	96	96	93

Source: EJSscreen Health Indicators – Oregon and US percentiles

In addition, both the project and target areas are in the 90+ percentile when compared to both Oregon and the US for the climate indicator wildfire risk. It is common for the City to be threatened by a wildfire every summer. Most recently, in June 2023, it was the Milepost 87 wildfire just east of The Dalles that destroyed three homes. Even in years when wildfires don't threaten the City, the local air quality index is frequently

⁶ U.S. Census Bureau (2017-2021). Total Population American Community Survey 5-year estimates.

⁷ EJ Screen

⁸ The Dalles Safe Routes to Schools Funding Application

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measured as unhealthy due to wildfire smoke. In 2017, The Dallas experienced 15 days with an unhealthy air quality index adding to cumulative health risk, particularly for the sensitive populations described above, and for the those with asthma. This grant will identify and help mitigate cumulative exposure of target area residents to contamination associated with brownfields that may be contributing to these high rates of disease and adverse health conditions.

(3) Environmental Justice (EJ): (a) Identification of EJ Issues: In recent years, the number of resources available to identify and mitigate EJ issues in communities has grown significantly. The Agency for Toxic Substances and Disease Registry developed its EJ Index Explorer. This online tool indicates an EJ index of “high” for the project and target areas⁹. Another online tool is the Climate and Economic Justice Screening Tool (CEJST) developed by the Council on Environmental Quality. CEJST identifies

disadvantaged communities burdened by climate change, energy, health, housing, legacy pollution, transportation, water, wastewater, and workforce development challenges. CEJST

Table 5	Westside TA		Downtown TA		The Dalles	
	Oregon	US	Oregon	US	Oregon	US
Lead Paint	60	55	97	94	80	72
Superfund Proximity	95	87	98	96	98	95
Risk Mgmt. Plan Facility Proximity	68	68	94	95	85	85
Demographic Index	80	61	78	60	68	53
Supplemental Demographic Index	85	76	90	80	75	66
People of Color	71	50	57	43	61	44
Low Income	81	75	86	80	69	65
Less Than High School Education	85	75	71	61	79	69
EJScreen Environmental and Socioeconomic Indicator Data – Oregon and US percentiles						

identifies both target areas as disadvantaged communities¹⁰.

EPA’s online EJ tool “EJScreen” can be used in identifying EJ communities based upon the presence of low income and minority populations (these two indicators are used in determining “demographic index”), unemployment, limited English, low educational attainment, and low life expectancy (all of these indicators except minority are used in determining “supplemental demographic index”). The data in Table 5 above demonstrate high percentiles for socioeconomic indices, indicating that the City and target areas are disadvantaged (i.e., that they are EJ communities). As indicated in Section 1.a.ii, it has been demonstrated that the target areas are disproportionately impacted by brownfields.

(3)(b) Advancing EJ: The revitalization of brownfields in the western Westside Target area will directly advance EJ by identifying and providing the opportunity for cleanup of contamination at brownfields near disadvantaged neighborhoods reducing exposure and associated health effects. Revitalization of brownfield in the eastern Westside Target area will create jobs available to disadvantaged target area residents indirectly advancing EJ through improved economic stability. In order to minimize the displacement of disadvantaged target area residents we will apply inclusive development principles to redevelopment project. We will also seek to apply policies around neighborhood stabilization (right of first refusal and renter protections), production (inclusionary zoning regulations), and preservation (strengthening of community resilience and preservation of existing unsubsidized affordable housing) as part our revitalization strategy. Perhaps most importantly we will implement capacity building activities to ensure that disadvantaged target area residents have a voice in revitalization priorities.

2.b. Community Engagement: 2.b.i. and 2.b.ii. Project Involvement & Roles: The City routinely engages with the local community on planning initiatives such as the recent The Dalles Vision 2040 project described in Section 1.b.i. An emphasis on meaningful engagement with all community members will be applied to the brownfield program as well. To encourage participation by the underserved members of the community, participant support costs will be offered for community attendee meetings. A town hall meeting was held on September 12, 2023, to inform stakeholders and the public regarding the City’s intent to apply for an FY2024 EPA brownfield grant, and to solicit input on priority sites and target areas. Meaningful input was received from meeting attendees and has been incorporated into the project described in this application.

The following project partners, nearly all of whom attended the September meeting, have indicated their interest in collaborating with the City in addressing brownfields. As part of the engagement plan for the project, an advisory committee will be convened comprised of many of these project partners.

⁹ <https://onemap.cdc.gov/portal/apps/sites/#/eji-explorer>

¹⁰ <https://screeningtool.geoplatform.gov/en/#10.68/45.5819/-121.1644>

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Table 6 – Organization	Point of Contact	Involvement/Role in Project
Columbia Gateway Urban Renewal Agency	Josh Chandler jchandler@ci.the-dalles.or.us	Assist with funding of projects within URA and owner of priority brownfields
The Dallas Main Street	Rose Mays staff.dallesmainstreet@gmail.com	Advocate for growth and revitalization of the historic downtown
Mid-Columbia Economic Development District	Carrie Pipinich carrie@mcedd.org	Connect the project to local economic development initiatives
Columbia Gorge Community College (CGCC)	Lisa George – lgeorge@cgcc.edu	Connect and represent underserved and/or underrepresented communities
Small Business Development Center	Greg Price – gprice@cgcc.edu	Connect and represent the small business community
North Wasco County School District	Carolyn Bernal bernalc@nwasco.k12.or.us	Owner of priority brownfield and brownfield education
Columbia Gorge Education Service District	Pat Sublette psublette@cgesd.k12.or.us	Stakeholder in priority brownfield site and brownfield education
Business Oregon	Tiffany Johnson tiffany.johnson@oregon.gov	Monetary and technical support through state brownfield program
Oregon Department of Environmental Quality	Katie Daugherty daugherty.katie@deq.state.or.us	Provide petroleum eligibility letters and regulatory oversight as needed
Mid-Columbia Housing	Joel Madsen – joelm@mid-columbiahousingauthority.org	Advocate for and connect us with the Westside Target Area EJ community
Mid-Columbia Community Action Council	Kenny LaPoint klapoint@mccac.com	
Communidas	Juan Monge Juan@communidas.org	Advocate for and connect us with the Hispanic and Native American communities in the project area
Columbia River Inter-Tribal Fish Commission	Buck Jones – buck@critfc.org	
North Central Public Health Department	Shellie Campbell shelliec@ncphd.org	Advocate for and connect us with local public health and EJ community

2.b.iii Incorporating Community Input: Project progress will be communicated to and input solicited from the local community using the following means:

- Continue to update and add content to the brownfield webpage on the City website as part of FY2020 grant outreach activities. Information posted on the website will include: 1) project-specific informational fact sheets; 2) a project schedule calendar; and 3) links to other websites, such as the EPA website, with educational content on brownfield revitalization.
- Hold a total of up to four public meetings (see Section 3.a.i for schedule). These meetings will include presentations regarding project progress and interactive exercises intended to encourage attendees to provide their ideas regarding the brownfield program and will include in-person and virtual options.
- Use of local print/online media (e.g., Columbia Gorge News, Columbia Community Connection, social media, bi-annual newsletter) to report project progress and announce upcoming public meetings.
- Attend and present information regarding the project at trade group and club meetings (Kiwanis, Rotary, Chamber of Commerce, etc.), on average two per year over the life of the project.
- Annual updates to the City Council and the Columbia Gateway Urban Renewal Agency Board.
- The City also conducts a yearly Local Government Academy to educate and involve the community in local governance. This course will include discussion on the topic of brownfield redevelopment.

To ensure that community input is considered, responded to, and adopted, the following actions will be taken: 1) the results of meeting data gathering efforts and other input received will be published on the project website to ensure transparency amongst stakeholders; 2) the leadership capacity of community members and groups will be enhanced to empower them to be heard; and 3) how project decisions were affected by community input will be described and how this input positively influenced the economic, social, and environmental successes of the project explained. At all meetings, special accommodations will be made available to ensure the participation of people with disabilities and/or non-English speakers.

3.0 TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs: 3.a.i. Project Implementation:

Task 1 – Cooperative Agreement (CA) Oversight and Reporting: Task 1 will include the following: 1) general CA compliance oversight; 2) quarterly progress reporting; 3) annual women and minority business enterprise (MBE/WBE) and federal financial report (FFR) reporting; 4) property Profile Form submission and updates in the EPA’s Assessment, Cleanup, and Redevelopment Exchange System

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(ACRES) database; and 5) a final report summarizing accomplishments, expenditures, outcomes, outputs, lessons learned, and resources leveraged.

Task 1 Lead: City with support from the QEP.

Task 2 – Community Engagement: The City formed a Brownfield Advisory Committee (BAC) in implementing its FY2020 grant and will continue to engage with the BAC over the duration of this project. This task also will include: 1) update of the public involvement plan prepared for our FY2020 grant; 2) outreach materials; 3) continued maintenance of brownfield website created for FY2020 grant; 4) solicit, consider, and respond to community input, including 3-4 public meetings; and 5) meetings with property owners to encourage their participation in the project.

Task 2 Lead: City with support from the BAC and the QEP.

Task 3 – Phase I and II ESAs: Phase I ESAs will be completed at up to 12 high priority brownfield sites. Intake of a property will be immediately followed by completion of an eligibility determination form and access agreement. Phase I ESAs will be performed in accordance with the All Appropriate Inquiries (AAI) Final Rule and the ASTM International (ASTM) E1527-21 standard. A completed AAI checklist will be prepared for each Phase I ESA report.

A comprehensive quality assurance project plan (QAPP) will be prepared to govern Phase II ESA quality control. It will conform to both EPA and Oregon DEQ requirements. Phase II ESAs and/or RBM Surveys will be completed at up to 12 sites. Each Phase II ESA/RBM Survey will include the following: 1) a Sampling and Analysis Plan (SAP), 2) materials demonstrating compliance with National Historic Preservation Act (NHPA) and Endangered Species Act requirements, and 3) a 29 CFR §1910.120 compliant site-specific health and safety plan.

Task 3 Lead: The QEP will complete all technical deliverables for this task as directed by the City.

Task 4 – Remedial, Reuse, and Area-Wide Planning: Up to six site-specific remedial action or reuse plans and one area-wide plan (AWP) will be completed.

Task 4 Lead: The QEP will lead both remedial and reuse planning, with reuse planning support from City Community Development Department staff.

3.a.ii Anticipated Project Schedule: The schedule graphic below demonstrates successful project implementation during the 4-year period of performance.

Task No.	Task Name	Description	FY2024		FY2025				FY2026				FY2027				FY2028				FY29	
			Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	
	Funding Decision & Cooperative Agreement	Funding Announcements	+																			
		Prepare CA Work Plan																				
		Cooperative Agreement Issued		+																		
1	CA Oversight & Reporting	Quarterly Reporting																				
		Annual DBE and FFR Reports																				
		ACRES Database Submittals																				
		Final Report																				
		An ACRES entry will be submitted at each site where funding is utilized.																				
2	Community Engagement	Public Involvement Plan			+																	
		Public/Stakeholder Meetings			+																	
		Webpage Updates																				
3	Site Selection and ESAs	Site Selection																				
		Phase I ESAs																				
		SAPs & NHPA/T&E Species																				
		Phase II ESAs																				
4	Planning	RBM Surveys																				
		Remedial and Reuse Planning																				
		Area-Wide Planning																				

3.a.iii. Task Activity Lead: Identified along with task descriptions in Section 3.a.i.

3.a.iv. Outputs: Task outputs are identified and quantified (as appropriate) in the table below.

<p>Task 1 – CA Oversight and Reporting</p> <ul style="list-style-type: none"> • Quarterly reports with budget status tables (16) • Annual DBE reports (4) • Annual FFR report (4) • Final project closeout report (1) • ACRES updates (18) 	<p>Task 3 – Phase I and II ESAs</p> <ul style="list-style-type: none"> • Eligibility forms and access agreements (18) • Phase I ESA reports (12) • EPA-approved QAPP (1) • NHPA and endangered species screens (12) • Site-specific health and safety plans (12) • Phase II ESA/RBM Survey reports (12)
<p>Task 2 – Community Engagement</p> <ul style="list-style-type: none"> • Public Involvement Plan (1) • Public, BAC and prop. owner meetings (~8) • Project webpage (~4 updates) • Press releases, fact sheets educational materials 	<p>Task 4 – Cleanup, Reuse and AWP Planning</p> <ul style="list-style-type: none"> • Remedial action plans (e.g. Analysis of Brownfield Cleanup Alternatives) (3) • Site-specific reuse plans (3) • Area-wide plans (1)

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3.b. Cost Estimates: Project cost estimates are provided by task below. City personnel costs are based on an average rate of \$90/hour (\$54/hour salary and \$36/hour fringe). Contractor costs are based on an average rate of \$170/hour. No indirect administrative costs are being requested.

Task 1: CA Oversight and Reporting (\$34,200): *Personnel/Fringe: \$9,000* (100 hours for conference attendance, project management, and reporting). *Travel: \$4,800* Two City personnel attend one national and one local brownfield conference (airfare to national conference [\$400/person = \$800]; hotel, meal, rental car and incidental costs [\$300/2 staff/2 days local transportation, meals, lodging/2 conferences = \$2,400]). *Contractual \$20,400* (120 hours for reporting and project management).

Task 2: Community Engagement (\$29,400): *Personnel/Fringe: \$9,000* (100 hours for meeting planning, attendance, and input evaluation; outreach material preparation; and website construction and maintenance). *Participant Support Costs: \$5,000. Contractual: \$20,400* (120 hours for meeting planning, attendance, and input evaluation; and outreach material preparation).

Task 3: Phase I and II ESAs (\$285,900): *Personnel/Fringe: \$1,800* (20 hours for site prioritization and selection and ESA oversight). *Contractual \$274,100* Phase I ESAs (including eligibility form and access agreement) \$66,000 [12 x \$5,500/each]; QAPP \$4,250 [25 hours]; Phase II ESAs including SAPs/NHPA \$203,850 [8 x \$20,481.25/each including 80 hours labor, \$3,200 lab testing and \$3,681.25 for drilling, locates, and investigation-derived waste disposal]; RBM Surveys including SAPs/NHPA \$40,000 [4 x \$10,000/each including 45 hours labor and \$2,350 lab testing]). *DEQ VCP Fees: \$10,000. A total of 57% of grant funding has been budgeted for Phase I and II ESAs.*

Task 4: Cleanup/Reuse/AWP Planning (\$150,500): *Personnel/Fringe: \$4,500* (50 hours for planning oversight). *Contractual: \$136,000* (Cleanup/Reuse Plans - 5 plans x \$17,000/each [500 hours]; AWP - 1 plan x \$51,000 [300 hours]). *DEQ VCP Fees: \$10,000.*

Budget Category	Task 1	Task 2	Task 3	Task 4	Total
	CA Oversight & Reporting	Community Engagement	Phase I & II ESAs	Cleanup/ Reuse Planning	
Personnel/Fringe*	\$9,000	\$9,000	\$1,800	\$4,500	\$24,300
Travel	\$3,200	\$0	\$0	\$0	\$3,200
Contractual	\$20,400	\$15,400	\$274,100	\$136,000	\$445,900
Other - Participant Support Costs		\$5,000			\$5,000
Other - Conference Fees	\$1,600	\$0	\$0	\$0	\$1,600
Other - DEQ VCP Fees	\$0	\$0	\$10,000	\$10,000	\$20,000
TOTAL	\$34,200	\$29,400	\$285,900	\$150,500	\$500,000

*Average for personnel weighted by involvement: \$54/hour personnel + \$36/hour fringe) = \$90/hour

3.c. Plan to Measure and Evaluate Environmental Progress and Results: The City has established a methodology to measure and evaluate project progress in achieving outputs and outcomes. On a quarterly basis coincident with quarterly progress reports completion, the following will be completed: 1) compare output/outcome goals to those achieved (see table below); and 2) evaluate the sufficiency of remaining budget and time to complete goals. By tracking results beginning at project inception, the achievement of project goals will be monitored in an efficient manner and corrective actions taken early if results are noted to be lagging and if achieving expected outputs/outcomes is at risk. All final results will be reported in the ACRES database and in the Closeout Report prepared at the end of the project.

OUTPUT Categories	Work Plan Goal	# this Quarter	# to Date	# Outstanding	Next Steps / Corrective Measures
Phase I ESAs / Phase II ESAs	12 / 12				
Cleanup+Reuse/AWP Plans	6 / 1				
Number of BAC Meetings	7				
Number of Outreach Events	4				
OUTCOME Tracking Categories					Result
Number of Properties/Acres Made Ready for Reuse					
Square Feet of Downtown Historic District Buildings Repurposed					
Number of Jobs Created					
Number or Real Estate Transactions Facilitated (including blighted properties)					
Number of Community Amenities (parks or natural areas) Created					
Amount of Funding Leveraged					

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4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE, 4.a. Programmatic Capability

4.a.i, 4.a.ii, and 4.a.iii: Organizational Capacity, Structure, and Key Staff: The City has ample capacity, derived from its community development, public works, and finance departments to manage the project and grant, as demonstrated by its successful management of its FY2020 EPA brownfield grant (see Section 4.b.i). The organizational structure utilized for the project will include the following: Dan Spatz in Community Development will be the day-to-day project manager; Dale McCabe in Public Works will provide back-up and technical support to Dan; and Angie Wilson in Finance will manage all project financial elements, including submitting drawdown requests to the EPA. This is the same organizational structure currently being employed to manage the City’s FY2020 EPA brownfield grant. Key personnel qualifications follow. **Dan Spatz, Economic Development Officer** – Dan served nine years on The Dalles City Council, 10 years as daily newspaper editor, and 15 years as advancement director for CCGC. While at CCGC, Dan helped establish renewable energy, construction trades and other career-tech programs. In his current City role, Dan is the project manager for the City’s FY2020 EPA brownfield grant and is responsible for numerous programs that overlap significantly with brownfields including urban renewal, enterprise zone, strategic investment program, and historic downtown vertical housing tax zone. **Dale McCabe, City Engineer** – Dale has been City Engineer for the City for 25 years. Dale is responsible for overseeing Engineering Division operations for the City and has extensive experience managing large-scale projects. Dale has been involved in all aspects of the City’s current FY2020 EPA Brownfield Grant. **Angie Wilson, Finance Director** – Angie will be the finance lead for the project. She has been in her current City role for 7 years. Angie has 25 years of finance experience, 16 working for local government.

4.a.iv Acquiring Additional Resources: The City has efficient and fair contractor procurement systems in place if the project requires additional expertise or resources. The City posts all requests for bids and proposals on its website. The City is deeply committed to advancing equity, diversity, and inclusion throughout the contracting process, and provides workshops to assist MBE/WBE contractors and promote equity in hiring. Procurement staff abide by the National Institute of Governmental Purchasing code of ethics, which ensures a level playing field and avoids conflicts of interest. Finally, the City is familiar with federal contract and subaward management requirements specified in 2 CFR §200.318 and 2 CFR §200.332, and 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33 procurement standard, and will abide by these requirements as appropriate.

4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: The City received in FY2020 a \$600K EPA Brownfield Coalition Assessment Grant (BF-01J86801-1).

(1) Accomplishments: Output goals from the City’s CA work plan and accomplishments are summarized in the table to the right. All EPA reporting requirements also were fulfilled. FY2020

OUTPUT	GOAL	ACCOMPLISHED
Eligibility Determinations/ ACRES Profiles	18	18
Phase I ESA	18	12
Phase II ESA including SAP and NHPA Screen	10	17
Cleanup Plans	3	5
Reuse Plans	2	4
Area-Wide Plans	1	1

EPA brownfield grant outcomes achieved to date by the City include: a) cleanups completed at 3 sites; b) 18 sites assessed and made ready for reuse; c) 15 jobs leveraged; d) \$180K leveraged from Oregon Brownfield Program; e) \$500K leveraged from urban renewal agency; and f) \$2 million in private investment leveraged. All accomplishments have been entered into ACRES.

(2) Compliance with Grant Requirements: The City has successfully complied with all aspects of its CA work plan and CA terms and conditions. All quarterly and annual reporting was completed on schedule, and all project ACRES reporting was timely completed. Achievement of project goals was slowed significantly in year 1 of the grant due to an inability to effectively complete outreach activities during the COVID-19 pandemic. As a result, a 1-year grant period extension was requested and received. At the conclusion of the EPA 2023 fiscal year, 77% of grant funding had been expended and the remaining 23% was fully committed to ongoing eligible grant activities. It is anticipated that all grant activities including project close-out will be completed no later than the second quarter of the 2024 fiscal year, well in advance of the current CA period of performance. As demonstrated in the table in Section 4.b.i(1) above, expected results/goals for the project have been substantially completed.

City of The Dalles

Threshold Criteria for Community-Wide Assessment Grants

1. APPLICANT ELIGIBILITY:

- (a) Applicant Type: City
- (b) Eligibility: City of The Dalles is not a 501(c)(4) organization.

2. COMMUNITY INVOLVEMENT:

The City of The Dalles plans to use the following means and methods to inform and involve the community and other stakeholders in the planning, implementation, and other brownfield assessment activities described in our application:

- Continue to update and add content to the webpage on the City website create as part of FY2020 EPA brownfield coalition assessment grant outreach activities. Information posted on the website will include the following: 1) project-specific informational fact sheets; 2) a calendar indicating the project schedule; and 3) links to other websites with educational content on brownfield revitalization such as the EPA website.
- Hold up to four public meetings. These meetings will include a presentation regarding project progress and interactive exercises intended to encourage attendees to provide their ideas regarding the brownfield program.
- Use of local print/online media (e.g., Columbia Gorge News, Columbia Gorge Connection, social media, bi-annual newsletter) to report project progress and announce upcoming public meetings.
- Attend and present information regarding the project at trade group and club meetings (Kiwanis, Rotary, Chamber of Commerce, etc.), on average two per year over the life of the project.
- Annual updates to the City Council and the Columbia Gorge Urban Renewal Agency Board.
- The City also conducts a yearly Local Government Academy to educate and involve the community in local governance. This course will include discussion on the topic of brownfield redevelopment.

To ensure that community input is considered, responded to, and in many cases adopted, the following actions will be taken: 1) the results of meeting data gathering efforts and other input received will be published to ensure transparency amongst stakeholders; 2) the leadership capacity of community members and groups will be enhanced to empower them to be heard; and 3) how project decisions were affected by community input will be described and how this input positively influenced the economic, social, and environmental successes of the project explained. At all meetings, special accommodations will be made available to ensure the participation of people with disabilities and non-English speakers.

3. EXPENDITURE OF EXISTING GRANT FUNDS:

As indicated in the Compass Data Warehouse general ledger record provided in Attachment A, as of October 1, 2023, the City's had drawn down \$461,806.57, or 77.0%, of its \$600K FY2020 EPA brownfield coalition assessment grant.

City of The Dalles

Threshold Criteria for Community-Wide Assessment Grants

4. CONTRACTORS AND NAMED SUBRECIPIENTS:

City of The Dalles has not yet selected a contractor that will be compensated with EPA funds made available under EPA-OLEM-OBLR-23-12. Nor has City of The Dalles identified any subrecipients to conduct work proposed in its application.