



November 13, 2023

The Honorable Michael Regan  
Administrator Environmental  
Protection Agency Office of the  
Administrator 1101A 1200  
Pennsylvania Ave., N.W.  
Washington, DC 20460

Dear Michael Regan,

[REDACTED]

[REDACTED]

[REDACTED]

**1. Applicant Identification:** City of Beaverton, 12725 SW Millikan Way, Beaverton, OR 97076

**2. Funding Requested:**

a. Assessment Grant Type: Community-wide

b. Federal Funds Requested: \$500,000

**3. Location:** City of Beaverton, Washington County, Oregon

**4. Target Area and Priority Site Information:** Target Area Census Tract 304.01, 310.05, 310.08, 311, 312.01, 312.02, 313.02, and 314.02.

Former Restaurant: 12525 SW Canyon Rd 97005

Industrial Infill: Tax lot IDs: 1S114CB00300 and 1S114CB01100

Kuni Auto: Address: 3725 SW Cedar Hill Blvd Beaverton, OR 97005

**5. Contacts:**

- a. Project Director: Michael Williams, (971) 325-6048, mwilliams@beavertonoregon.gov, City of Beaverton, P.O. Box 4755, Beaverton, OR, 97076.
- b. Chief Executive/Highest Ranking Elected Official: Mayor Lacey Beaty, 503.526.2345, lbeaty@beavertonoregon.gov, 12725 SW Millikan Way, Beaverton, OR 97076.

**6. Population:** Population for the City of Beaverton is 98,698

**7. Other Factors Checklist:** Please identify which of the below items apply to your community/proposed project. If none of the Other Factors are applicable to your community/ project, please provide a statement to that effect.

<b>Other Factors</b>	<b>Page #</b>
Community Population is 10,000 or less	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) 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).	5
The priority site(s) is in a federally designated flood plain	5
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.	6, 7
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	
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.	



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Northwest Region  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
(503) 229-5696  
FAX (503) 229-6124  
TTY 711

November 6, 2023

*via electronic delivery*

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

Re: DEQ Support - City of Beaverton's EPA Community-Wide Brownfield Assessment Grant Application

Terri:

The Oregon Department of Environmental Quality (DEQ) acknowledges and supports the City of Beaverton's application for a \$500,000 community-wide brownfield assessment grant. DEQ understands that the City plans to use grant funding to support brownfield redevelopment efforts in the area defined by their Downtown Equity Strategy. The strategy is a framework that aims to guide redevelopment in and around downtown Beaverton to ensure it develops as an inclusive place for racially diverse communities and prevents, minimizes, and/or mitigates displacement.

Leveraging several funding sources and continuing the partnership with Beaverton Urban Renewal Agency, the City will use EPA grant funding to identify and investigate sites within the target areas described in the grant application. This will provide needed services to vulnerable populations including affordable and workforce housing, new childcare businesses, and other transit-oriented development. This initiative will address known or suspected legacy environmental contamination that negatively impacts the community, particularly communities of color.

DEQ recognizes the vital role brownfield redevelopment plays in promoting economic stability and the protection of human health and the environment. Thus, DEQ supports Beaverton's application for the EPA Brownfield Grant. Please contact Kara Master, DEQ's Northwest Region Brownfields Coordinator, at 503-229-5585 if you have any questions.

Sincerely,

*Christine Svetkovich*

Christine Svetkovich (she/her)  
Northwest Region Administrator

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

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**1.a. Target Area and Brownfields-** 1.a.i. Overview of Brownfield Challenges and Description of Target Area: Beaverton is a 19.6 square mile, first-tier suburb in the western region of the Portland metro area. Beaverton's population is 98,698 and is recognized as one of the most culturally diverse communities in Oregon, where over one quarter of residents speak a language other than English. Metro, the region's Metropolitan Planning Organization, has designated downtown Beaverton as one of eight Regional Centers and has forecasted it to add an additional 4,500 new jobs and 10,000 new residents over the next 25 years. As part of its community development strategy, the city has prioritized investment in affordable housing, transit-oriented development, and revitalization for the downtown core. Beaverton prides itself on its well-planned neighborhoods, but the dramatic change to its economy over the past 40 years has contributed to the presence of brownfields and a lack of appropriate levels of density and bike-ped infrastructure. The sharp decrease in manufacturing since 1980 left portions of downtown Beaverton with contaminated vacant or underutilized properties that remain an impediment to redevelopment in the area. With this proposal, Beaverton will continue its successful working relationship with EPA and Oregon Department of Environmental Quality (ODEQ) to build upon the community's long-term commitment to redeveloping brownfield sites for productive reuse, ensure a safe and healthy environment, and attract private investment to the City's most distressed areas.

The Target Area for this proposal is the Beaverton Downtown Equity Strategy Boundary (BDES). The three square mile geographic area of the BDES includes the Downtown Planning District (Downtown) the Allen Boulevard Corridor area (Allen Blvd), and the West Five Industrial Area (West Five). Parts of Downtown have benefitted from significant transit investments and transit-oriented development, including the relocation of City Hall and construction of the Patricia Reser Center for the Arts (PRCA), a former brownfield site. However, it suffers from inadequate bike and pedestrian investment, challenging environmental and soil conditions caused by historic fill activities, floodplain designations, and large expanses of paved land. Due in large part to City incentive programs, including previous grants through the Brownfields Assessment Program, the area has experienced a surge of mixed-use residential and commercial development in recent years, but suspected and proven contamination on several sites remains an impediment to further development. Other portions of Downtown have a mix of older residential and commercial construction and has historically struggled with walkability and transit access, being separated from major transit hubs by a state highway. One brownfield site was recently redeveloped with City and Oregon Metro assistance to become a 54-unit affordable housing complex targeted toward families with children, but many other sites still face barriers to redevelopment due to contaminated soil from past uses that the assessment grant can identify and help address. Allen Boulevard is a culturally diverse corridor that is experiencing rapid change and development pressures. This area has a higher concentration of small, minority-owned businesses, and many of the commercial buildings that house these businesses face contamination. The neighborhood surrounding Allen Boulevard is in a Metro Equity Focus Area, with higher-than-average numbers of residents of color, have limited English proficiency, and/or have lower incomes. The West Five Industrial Area represents one of the few remaining industrial areas in Beaverton. Beaverton has been making investments in transit access and pedestrian safety in West Five but is certain to encounter brownfields as it seeks to facilitate increased employment and maintain industrial opportunities. The grant will help the City focus redevelopment opportunities on these priority sites and ensure projects are developed in tandem with the Beaverton Downtown Equity Strategy (BDES), a city initiative to guide public investments in downtown Beaverton with a focus on racial equity, preventing and mitigating displacement, and creating an inclusive downtown.

1.a.ii. Description of the Priority Brownfield Site(s): This proposal will conduct petroleum and hazardous waste assessments on sites throughout the target area that face legacy contamination from auto-oriented businesses, past industrial uses, and older structures with perceived hazardous contamination. The City has identified 70 known brownfields in the target area, many near schools. Three priority sites for assessment have been identified. First, the Kuni Auto Center- proposed Westgate Drive/ Dawson Way

Road realignment (Kuni Auto), which resides in the Creekside sub-district of the Downtown Planning District, would significantly improve pedestrian and bike safety and district connectivity. The existing intersection of Dawson Way and Westgate Drive is offset by 125 feet and poses a significant safety risk, but the street realignment and addition of a signalized crossing will require the purchase of at least a portion of an auto dealership. Purchase of a significant portion of the site is possible. The northern portion of the auto dealership is adjacent to Beaverton Creek and part of a federally designated floodplain. Second, the Canyon Road Former Restaurant Site (Former Restaurant) is a long-vacant restaurant at the high visibility corner of Canyon Road and Watson Avenue is currently in the process of being cited as a health and safety risk to the community. The building has been abandoned for more than a decade and has a collapsed roof, leading it to be deemed a dangerous building and a nuisance by our Building Department. It has also been surrounded by auto related business for decades and there is fear possible auto related contaminations are present. Third, the 5<sup>th</sup> Street and Western Avenue Infill Industrial Development Opportunity (Industrial Infill) is two properties at the intersection of 5<sup>th</sup> Street and Western that used to be an auto dealership and an industrial facility. The sites are currently undeveloped and zoned for industrial uses. This crucial employment area is seeing increased development pressure, including high density, multiple use residential and commercial construction. The city has made significant investments in recent years to improve transit access and pedestrian safety in the area, including a complete bike lane on Fifth Street. Developing these vacant parcels could increase employment opportunities in West Five and address any contamination issues from previous industrial uses as neighborhoods develop across the street. At all three sites, due to auto related use or proximity, the City is concerned about environmental hazards associated with petroleum hydrocarbons, solvents, metals, polychlorinated biphenyls, and asbestos. Through assessment and cleanup planning, the City will leverage EPA funding with already successful development incentive programs to redevelop brownfields sites in alignment with community goals and market fundamentals. The City will coordinate with ODEQ to confirm eligibility of targeted petroleum sites, including the high number of underground storage tanks throughout the target area<sup>1</sup>. Several brownfield locations in the BDES, including Kuni Auto and Former Restaurant, are impacted by federal flood plain designation. The City is located in the Willamette sub-region and Tualatin Valley drainage basin, and Beaverton Creek drains approximately 36 square miles as it flows through the major commercial area of Beaverton. The potential for property damage from flooding is severe in this area because of inadequate sizes of channels causing overbank flooding during even mild storms as well as overtaxed storm water systems.

**1.a.iii Identifying Additional Sites:** The City has a strong history of completing Brownfields assessment grant in a timely and cost effective manner. Evaluation criteria used to select additional appropriate properties for assessment include removal of health hazards; ability to create quality jobs and affordable housing for neighborhood residents; capacity to build upon Beaverton's economic strengths, particularly advanced manufacturing; potential to leverage other federal and state resources, community input through engagement the process, and impact on health and safety residents in disadvantaged communities. The City will conduct public outreach for input for which sites should be assessed. A 2021 city report of historically racist land use and housing practices in the City along with the Downtown Equity Strategy (BDES) will also inform the selection of additional sites to ensure investments are made to support underserved communities.

**1.b. Revitalization of the Target Area- 1.b.i. Reuse Strategy and Alignment with Revitalization Plans:** The proposed assessment and planned redevelopment in the BDES aligns with multiple City and regional planning documents. Beaverton's Creekside District Master Plan (Master Plan)<sup>2</sup> builds upon the work of the Beaverton Community Vision Plan (2010, revised 2016)<sup>3</sup>, the Beaverton Civic Plan (2011)<sup>4</sup>, and the

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<sup>1</sup>According to data available from the EPA's Environmental Justice Screening and Mapping Tool (Version 2 0)

<sup>2</sup> <https://www.beavertoncivicplan.com/creekside-master-plan/>

<sup>3</sup> <https://www.beavertonoregon.gov/326/Beaverton-Community-Vision>

<sup>4</sup> <https://www.beavertonoregon.gov/675/Civic-Plan>

Beaverton Urban Renewal Plan (2011)<sup>5</sup>. The Downtown Design Project (2020)<sup>6</sup> updated zoning and regulations for downtown development to increase density and improved pedestrian and cyclist safety. The Allen Boulevard District Plan obtained input in 2019 from residents and business owners in the Allen District and created an action plan to address their concerns, and the Beaverton Downtown Design Project focuses on mobility, zoning code, development costs, and urban form. The Housing Five Year Action Plan, Beaverton Affordable Multifamily Housing Preservation and Development Study and Multifamily Rental Housing Inventory Report, and Housing Options Project all focus on maintaining and improving the existing housing supply with a focus on those experiencing housing instability and creating new housing. The City's Economic Strategic Plan sets goals for business retention and expansion, placemaking, workforce development, and other aspects of economic development. The Diversity, Equity, and Inclusion Plan has six priority areas containing aspirational goals and progress indicators around public engagement, city practices, housing and livability, public safety, economic empowerment, and community building and inclusion. The Brownfields Assessment Grant represents an aspect of implementation of all these plans as it will facilitate redevelopment of contaminated properties that negatively impact community health and represent a barrier to safe, walkable neighborhoods. Revitalization of the BDES is a component of each plan. The Master Plan prioritizes redevelopment of vacant and underutilized properties in the Downtown Creekside sub-district. The vision for Creekside is to be a cultural hub, where housing and jobs are readily accessible by regional transit. The Master Plan calls for incorporating green technology in new development and the creation of a continuous greenway along the District's creek through both public and private property, addressing floodplain issues. Residing in the Downtown Planning District is also Old Town. This area in the BDES represents redevelopment opportunities for new housing and commercial spaces interspersed with renovated historic buildings, creating a unique character. Allen Boulevard is a major commercial thoroughfare that is heavily auto oriented, to the detriment of the health and safety of nearby residents. West Five Industrial Area can support new, denser employment uses while remaining an industrial center for the city, and improved transit and pedestrian connections can improve access to living wage jobs for low residents. West Five is one of the few remaining areas of industrial land in the City and represents a vital employment opportunity. Improving access and increasing employment density are vital components of the Economic Development Strategic Plan. The reuse strategy for Brownfield sites will all follow approved guidance from the Beaverton Urban Redevelopment Agency (BURA) Board. The approved strategy ensures alignment with the City regional plans and outreaches to the public, including historically underserved communities, and stakeholders on priority goals reflecting community needs and desires. Guided by these plans developed in close coordination with residents, stakeholders, elected officials and City staff, Beaverton will work with businesses and developers to locate and expand employment and housing uses on brownfields.

1.b.ii. Outcomes and Benefits of Reuse Strategy: This redevelopment strategy will increase the availability of developable land through brownfield identification and remediation. The increased land supply will be used to further the City's goals of attracting more family wage jobs and housing options that are accessible by public transportation and improved pedestrian and bicycle connections. It focuses on properties catalytic to the redevelopment and economic revival of the Downtown Planning District. This redevelopment strategy focuses on ensuring underserved or low income resident have access to housing, employment, and resources within their current community. Redevelopment of these properties will expand Beaverton's tax base and provide the necessary tax increment to further implement the City's revitalization plans. West Five is accessible by public transit and represents a redevelopment opportunity that can help the City attract industrial businesses and family wage jobs. Allen Blvd has recently seen the development of the Beaverton Public Safety Center on a brownfield site and can continue to benefit from assessment and redevelopment of older commercial properties impacted by lead, asbestos, and other

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<sup>5</sup><https://www.beavertonoregon.gov/DocumentCenter/View/1849/BURA-Plan-City-Council-6-9-2011?bidId=>

<sup>6</sup> <https://www.beavertonoregon.gov/643/Downtown-Design-Project>

contaminants. These properties can be redeveloped into mixed-use housing that improves visibility and pedestrian access while mitigating contamination concerns in historically underserved communities within the City. Beaverton will continue to work with the community to target EPA funding to the assessment of properties that will provide for the greatest community benefits, including advancing environmental justice goals. Green infrastructure, vegetation and open space are also integral components of the City's redevelopment vision and improves local climate mitigation.

**1.c. Strategy for Leveraging Resources-** **1.c.i. Resources Needed for Site Reuse:** To better address environmental contamination in the Target Area, the City will leverage funding from available tax increment financing reserves. Eligible businesses in the target area may enroll in an Enterprise Zone Program that provides tax exempt status for new construction and equipment investments for up to five years. The Beaverton Urban Renewal Agency has been a close partner in previous Brownfield Assessment Grants, helping to identify properties for assessment and redevelopment with public-private partnerships. The City could issue bonds or utilize general fund resources to address particular public needs, including the safety of residents, by cleaning up contaminated soil and water resources.

The City will request support as needed from Business Oregon's Brownfields Redevelopment Program, which offers grant and loan opportunities for brownfield redevelopment projects. The City's assessment of existing infill sites is in the process of leveraging its portion of the \$652.8 million Metro Housing Bond approved in November 2018 by increasing the land supply available for additional housing. The Kuni Auto and the Former Restaurant sites are located in an Opportunity Zone, allowing developers and investors to access deferrals and reductions in capital gains taxes by investing in the redevelopment of these sites. The Industrial Infill site is expected to leverage investments by new private ownerships of each of the properties. These ownerships are active developers having made improvement to adjoining properties. In 2022, the City was awarded a \$2 million RAISE planning grant from the USDOT to advance the design and engineering of the Beaverton Downtown Loop Complete Street Project , which is located within the target area. The first phase of the Loop project includes wide outreach to the community and small businesses, focusing on culturally specific engagement with underrepresented communities. The findings will create additional investment opportunities for brownfields assessment and cleanup planning.

**1.c.ii. Use of Existing Infrastructure:** The project will leverage existing access to bus and light rail transportation, water, sewer, and electrical infrastructure already serving the Target Area. The existing infrastructure is sufficient for increased development. The City provides water to approximately 73% of Beaverton residents and works closely with Washington County, neighboring cities, and Metro to align transportation, electricity, and other infrastructure needs. Redevelopment of the Kuni Auto, Former Restaurant and Industrial Infill priority sites will be served by existing power, water, and electric infrastructure but will incorporate green energy and pedestrian improvements to help create a more sustainable district. TriMet recently received \$5.6 million from the FTA to provide better layover services to bus riders and operators and create space to accommodate new electric buses, which will directly impact development demand at all three priority sites.

## 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

**2.a. Community Need-** **2.a.i. The Community's Need for Funding:** The City is limited in its ability to invest in the inventory and assessment of brownfields without EPA's assistance. Beaverton is anticipating an approximately \$4.8 million budget gap for the coming fiscal year, after already finding \$10 million in cuts or new revenues to balance the general fund budget in 2023. City General Fund relies heavily on property taxes. In Oregon, growth in assessed property tax values are capped at a maximum of 3% each year, and properties only receive a new assessment if they are significantly renovated or replaced. Even if property values increase significantly, state law prevents an equivalent increase in tax revenue. Beaverton also spent heavily to address the impacts of the pandemic by providing support to low-income residents to keep them in housing and to businesses to comply with public health guidelines and continue paying wages and rents. As a result of these expenditures, the City is entering a period of fiscal restraint to rebuild

needed reserves and ensure essential services to the community are adequately funded, and assessing brownfields to support redevelopment is significantly outside the scope of current and forecasted budgets.

2.a.ii. Threats to Sensitive Populations (1) *Health or Welfare of Sensitive Populations*: The BDES is home to some of Beaverton's most vulnerable populations. Of the roughly 33,500 residents of the Target Area<sup>7</sup>, over 40% identify as a person of color and over 31% speak a language other than English at home. Significant disparities remain in educational attainment and household income by race and ethnicity. The high school graduation rates are almost 38% lower for the nearly 30% of people who identify as Hispanic or Latino origin in this area than Beaverton as a whole. These disparities have adverse economic impacts. Median household incomes for Hispanic or Latino families in the Target Area are about \$8,000 less than median incomes of all households and \$14,000 less than white households alone. The Kuni Auto resides on the border of two disadvantaged census tracts, 314.02 and 313, the Former Restaurant is in 313, while the Industrial Infill lies right outside two disadvantaged census tracts, 311 and 313.

Public health challenges disproportionately impact sensitive populations, including children, the elderly, and the poor. The brownfields in the Target Area are a large part of this equation. Communities with many brownfields tend to have a multitude of public health issues. According to the EPA EJ Screen Tool, the majority of the Target Area is within the 70-80 percentile for Asthma, including all within a disadvantaged Census Tract. For Cancer health disparities a portion of the Target Area is in the 80-90 percentile. Inside the Target Area is Beaverton High School, several daycares, and a number of naturally occurring low-income apartment buildings and single-family dwellings. Brownfields may be directly impacting public health through contaminant exposure. The identification, assessment and cleanup of brownfield sites will immediately reduce the potential health impacts.

(2) *Greater Than Normal Incidence of Disease and Adverse Health Conditions*: Beaverton is one of a handful of cities in Oregon designated by the Department of Health and Human Services (HHS) as a Medically Underserved Area, which includes neighborhoods identified as having high infant mortality, high poverty, and a high elderly population. Washington County, where Beaverton is located and the smallest jurisdiction for which data is available, suffers from environmental and health issues. 15% of Washington County's population is considered to be in poor or fair health, compared to 10% nationally. ODEQ monitors for certain air quality pollutants, specifically fine particulate matter, also known as PM2.5 throughout the Portland Metro region, and recent monitoring data has shown high particulate levels in nearby Hillsboro. While the region is not currently over the federal health standard for PM2.5, it is getting close and poor air quality could result in adverse health and economic impacts to the region and Target Area. Additionally, portions of the Target Area are impacted by very high Traffic Proximity according to the EPA's EJScreen Tool. According to the Oregon Health Authority<sup>8</sup>, approximately 10% of Washington County residents have asthma, 6% suffer from cardiovascular disease and 7% are cancer survivors. Approximately 8% of Washington County's population does not carry health insurance. Brownfields in the Target Area may be directly impacting public health through exposure of residents to contaminants sourced from these sites.

(3a) *Identification of EJ Issues*: Within the target area, Census tract 314.02, 313, and 311 are all designated disadvantaged according to CEJST. Brownfields pose a number of risks to the community, and significantly overburden low-income and POC residents. The Target Area has a high percentage of renter occupied households spending 30% or more of their income on rent. The neighborhood surrounding Allen Boulevard is in a Metro Equity Focus Area, with higher-than-average numbers of residents who are people of color, limited English proficiency and lower incomes. The existing cross-section on Allen Boulevard varies between four and five lanes and is on the region's High Injury Corridor map. This area therefore

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<sup>7</sup> For data analysis purposes, the BDES Target Area is defined by Census Tracts 304.01, 310.05, 310.08, 311, 312.01, 312.02, 313.02, and 314.02. Data is averages of Census Bureau data for each Census Tract. Source: U.S. Census Bureau American Community Survey 2016-2020 5 year Estimates.

<sup>8</sup>[https://www.oregon.gov/oha/PH/DISEASES/CONDITIONS/CHRONIC/DISEASE/DATAREPORTS/Documents/datatables/ORCountyBRFSS\\_diseases.pdf](https://www.oregon.gov/oha/PH/DISEASES/CONDITIONS/CHRONIC/DISEASE/DATAREPORTS/Documents/datatables/ORCountyBRFSS_diseases.pdf)



poses an increased danger to the health and safety of rent-burdened communities of color. There is an urgency for affordable housing throughout the Portland metro area, with a shortage of affordable housing estimated to be impacting close to 40% of the population. Brownfield redevelopment can create immediate and long-term job opportunities and facilitate the development and availability of affordable housing. The City expects it to spur additional housing availability in the target area for low-income residents. The industrial infill site is near a new high density, affordable housing development and will pose new health and safety concerns for the new residents. Along with potential environmental hazards at the Kuni Auto site, the site has exacerbated safety hazards for pedestrians and bicyclists due to the roadway design.

(3b) Advancing Environmental Justice: The brownfield redevelopment will also align with the BDES framework to guide public investments in downtown Beaverton with a focus on racial equity. The priority sites selected for assessment will not cause displacement of residents or businesses in the target area. A displacement strategy for other potential sites would comply with already defined strategies in the BDES. They were last updated in the Fall of 2022.

Environmental Justice Indicators for the target area can be found in the table. This report shows the values for environmental and demographic indicators and EJ Screen indexes. These percentiles provide perspective on how the selected section compares to the state and nation. Within the state, the target area is **within the top ten percent for these contaminants**. These contaminants pose a direct threat to residents and assessment of Brownfields is essential to eliminate health vulnerabilities and promote environmental justice within the area.

EJ Indicators	State Percentile	US Percentile
PM 2.5	95	82
NATA Diesel PM	92	85
NATA Air Toxics Cancer Risk	92	88
NATA Respiratory Hazard Index	94	90
Traffic Proximity and Volume	95	84
Superfund Proximity	90	76
Hazardous Waste Proximity	91	76

Environmental Justice Indicators for the target area can be found in the table. This report shows the values for environmental and demographic indicators and EJ Screen indexes. These percentiles provide perspective on how the selected section compares to the state and nation. Within the state, the target area is **within the top ten percent for these contaminants**. These contaminants pose a direct threat to residents and assessment of Brownfields is essential to eliminate health vulnerabilities and promote environmental justice within the area.

## 2.b. Community Engagement- 2.b.i-ii Project Involvement/Project Roles:

Partner Name	Point of Contact	Specific Involvement in the Project or Assistance Provided
Beaverton Urban Redevelopment Agency Board	Nadia Hasan, Board Chair <a href="mailto:nhasan@beavertonoregon.gov">nhasan@beavertonoregon.gov</a>	BURA oversees development work within the Central Beaverton urban renewal area that includes Downtown Planning District. BURA will assist with identifying sites for brownfield assessment.
Neighborhood Association Committees	Chase Landry, Neighborhood Program Coordinator (503) 526-3706 <a href="mailto:clandry@beavertonoregon.gov">clandry@beavertonoregon.gov</a>	Will assist with community outreach, information sharing, and hosting presentations. Since the priority sites are located within the Central Beaverton NAC, it will help advise on areas of concern related to the redevelopment of suspected brownfield sites.
Impact Beaverton	Rob Routhieaux, Director 503-350-2003 <a href="mailto:rob@Beaverton.org">rob@Beaverton.org</a>	Will assist in community and business outreach within underserved communities. Will also serve as an ecosystem leader and connector to a wide range of community based organizations.
Washington County	Matt Craigie, Economic Development Manager (971) 284-0727 <a href="mailto:Matt_Craigie@washingtoncountyor.gov">Matt_Craigie@washingtoncountyor.gov</a>	Will provide jurisdictional support and engagement with property owners inside and outside Beaverton boundaries to address brownfield impacts.
Beaverton Area Chamber of Commerce	Alicia Bermes, President/CEO (503) 350-2006 <a href="mailto:alicia@beaverton.org">alicia@beaverton.org</a>	The Chamber has an extensive network of local businesses who are members within the priority sites and will assist with providing outreach and awareness to these businesses.
Greater Portland, Inc.	Monique Claiborne President and CEO (503)308-9550	Greater Portland Inc. has traded sector expertise and regional engagement experience and expertise with businesses and service providers.
Business Oregon	Karen Homolac, Brownfields Program Specialist (971) 239-9951 <a href="mailto:karen_homolac@oregon.gov">karen_homolac@oregon.gov</a>	Will provide technical assistance in project planning and increased capacity to fund assessments and cleanup on specific projects.
Oregon Department of Environmental Quality	Ned Fairchild, Manager, DEQ HQ Cleanup Program <a href="mailto:ned_fairchild@deq.oregon.gov">ned_fairchild@deq.oregon.gov</a>	Will provide technical and regulatory oversight in relation to brownfield assessments and cleanup planning.

2.b.iii. Incorporating Community Input: The Target Area covers the Central Beaverton Neighborhood Action Committee (NAC). Meetings between community members, City staff, and partnering agencies occur monthly and NACs provide the City with a direct communication and outreach channel to the community. Input will be solicited through NAC-hosted informational sessions, open houses, area specific surveying, online surveying and/or focus groups; all conducted to ensure equitable opportunity for

engagement. Virtual meeting opportunities will be available to those who cannot attend in person. The City’s website will provide a link for written comment, information on how to attend a meeting, and meetings notes. The City’s Diversity, Equity, and Inclusion (DEI) plan and the Downtown Equity Strategy will provide the framework to ensure inclusive community engagement for all City initiatives. The City will conduct specific outreach to low income and historically underrepresented members of the community within the target area beyond the NAC meetings. These meetings will include Participant Support Costs (PSCs) that include a dedicated childcare provider for residents attending evening community and stipends for time and transportation assistance will be offered to remove additional barriers from participation. The City will obtain prior approval from EPA before paying out PSCs and will track disbursements and receipts. Outreach will include virtual meeting options, interpretation services during meetings, and translated written materials. Franziska Elliot, Public Involvement Coordinator, will be tasked with leading the general community outreach with support from Rachel Thieme, Development Project Manager. Both have robust history of leading community outreach to underrepresented communities and CBOs in the target area to solicit feedback for city planning efforts. The City will compile and organize the community input to be used by the City. The City will prioritize incorporating input from the community to guide the decision making process throughout the entirety of the project.

### **3.TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

#### **3.a. Description of Tasks/Activities and Outputs:**

<i>Task 1- Project Management and Reporting</i>
i. Project Implementation: This task includes management, implementation, and execution of the grant. The EPA-funded budget includes funding to support the time of the project manager, who will serve as liaison between the City and EPA Region 10 and will ensure compliance with administrative and reporting requirements of the cooperative agreement. Travel expenses are included to attend regional and national EPA Brownfields conferences and other workshops as appropriate. This task also includes tracking and measuring progress on grant goals, quarterly project reporting to EPA, contractor procurement activities, management of intergovernmental agreements, and producing the final report to the EPA.
ii. Anticipated Project Schedule: The duration of the entire four-year period of the grant
iii. Task Lead: City of Beaverton Project Manager
iv. Outputs: EPA Quarterly reports, quarterly ACRES updates, and oversight field reports.
<i>Task 2: Community Engagement</i>
i. Project Implementation: This task will develop a Public Involvement Plan (PIP) to engage residents, businesses, CBOs, property owners, and other stakeholders on brownfields revitalization opportunities. Public meetings will be organized for all stakeholders with the assistance of the city’s Community Engagement staff, Direct outreach to owners of brownfield properties will be conducted to promote funding opportunities available for redevelopment. Project updates will be provided to Beaverton residents with opportunities for feedback on grant activities. The City will use Participant Support Costs (PSC) for attendee stipends and childcare at meetings.
ii. Anticipated Project Schedule: Duration of the grant period
iii. Project Lead: The City of Beaverton and the qualified environmental contractor
iv. Outputs: the PIP, handouts during public meetings, and meeting minutes.
<i>Task 3: Site Assessments and Characterization</i>
i. Project Implementation: Beaverton will complete fifteen Phase I assessments on properties likely experiencing contamination from hazardous substances and/or petroleum, estimated at \$5,000 each. Following up on these Phase I assessments, the city will complete ten Phase II assessments on eligible properties, estimated at \$27,500 each, to further redevelopment goals in the Target Area. These activities will be conducted by qualified environmental professionals, and sites will be prioritized using

community input and potential to exacerbate environmental and health impacts in the future. All assessment activities will be managed in accordance with Endangered Species Act (ESA) and National Historic Preservation Act (NHPA) requirements and will follow guidelines set forth in a Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HSP).

- ii. Anticipated Project Schedule: Over the four year period of the grant
- iii. Project Lead: The City of Beaverton
- iv. Outputs: Quality Assurance Project Plan (QAPP), approximately fifteen Phase I and ten Phase II reports on eligible brownfield properties in the target area.

**Task 4: Cleanup and Reuse Planning**

- i. Project Implementation: Cleanup and reuse plans, including Analyses of Brownfield Cleanup Alternatives (ABCAs), Contaminated Media Management Plans (CMMPs), Site Reuse Assessments, Market Studies, and other eligible activities, will be developed with significant input from the community. These planning activities will include the consideration of which reuse options and feasible economic approaches are consistent with public health and environmental objectives at these sites. Funding is included for Beaverton personnel to manage the cleanup and reuse planning activities, as well as limited meeting expenses. Sites selected for cleanup planning will be prioritized based on risks to human health and safety, preparedness for redevelopment, and community input.
- ii. Anticipated Project Schedule: Over three years as sites are prepared to move to this stage
- iii. Project Lead: Qualified environmental professionals and economic reuse experts
- iv. Outputs: Approximately four cleanup plans for eligible properties.

**3.b. Cost Estimates:**

Budget Categories		Project Tasks (\$)				Total
		Project Management	Community Engagement	Site Assessments and Characterization	Cleanup and reuse Planning	
Direct Costs	Personnel	\$8,500	\$3,500	\$3,500	\$3,500	\$19,000
	Fringe Benefits	\$2,550	\$1,000	\$1,000	\$1,000	\$5,550
	Travel <sup>1</sup>	\$5,000	\$0	\$0	\$0	\$5,000
	Equipment <sup>2</sup>	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$1,250	\$1,250	\$1,250	\$3,750
	Contractual	\$12,950	\$16,250	\$338,000	\$80,000	\$447,200
	Other (include subawards and PSC (stipends, and childcare))	\$0	\$12,000	\$0	\$0	\$12,000
Total Direct Costs <sup>3</sup>		\$29,000	\$34,000	\$343,750	\$85,750	\$492,500
Indirect Costs <sup>3</sup> –		\$1,500	\$2,000	\$2,000	\$2,000	\$7,500
<b>Total Budget (Total Direct Costs + Indirect Costs)</b>		<b>\$30,500</b>	<b>\$36,000</b>	<b>\$345,750</b>	<b>\$87,750</b>	<b>\$500,000</b>

<sup>1</sup> Travel to brownfields-related training conferences is an acceptable use of these grant funds

<sup>2</sup> EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for Brownfield Grants

<sup>3</sup> Administrative costs (direct and/or indirect) cannot exceed 5% of the total EPA-requested funds

**Task 1 - Project Management and Reporting:** Beaverton staff will provide grant management oversight and contractor coordination.

1. \$11,050 for programmatic management of the grant including quarterly reports (157 hours at \$70 per hour staff)
2. \$12,950 for contractor program management, including ACRES updates
3. \$5,000 for staff travel to the EPA Brownfields Conference and regional conferences

**Task 2 - Community Engagement:**

1. \$4,500 for Beaverton staff work on the PIP, advertise, and attend public meetings (64 hours at \$70 per hour)
2. \$16,250 for consultant time to finalize the PIP, assist in the community outreach, and participate at the public meetings (162 hours at \$100/hour)

3. \$1,250 for supplies that will comprise newspaper advertising and presentation materials.
4. \$12,000 for PSC in Other, \$9,000 for attendee stipends, \$3,000 for childcare at meetings (60 hours at \$50/hour).

*Task 3 - Site Assessments and Characterization:*

1. \$4,500 for Beaverton staff to oversee eligible projects and report to ODEQ and EPA as needed (64 hours at \$70 per hour)
2. Approximately \$338,000 for consultant time to prepare the QAPP and conduct site assessments.
3. \$1,250 for limited supplies such as promotional materials for public meetings and publication of public notices

*Task 4 - Cleanup Planning:* This task includes consultant costs for cleanup and reuse plans, at an estimated cost of \$20,000 each.

1. \$4,500 for Beaverton staff to oversee eligible projects, reporting to ODEQ and EPA as needed, and coordination with community stakeholders (64 hours at \$70 per hour)
2. \$1,250 for limited supplies such as promotional materials for public meetings and publication of public notices
3. Approximately \$80,000 in consultant funding to engage in cleanup and reuse planning.

**3.c. Plan to Measure and Evaluate Environmental Progress and Results:** A detailed work plan with milestones, responsibilities, project outcomes will be developed within three months of award. Participants will include the Community Development Director, Economic Development Manager, Sustainability Program Coordinator, and other key City staff. Kara Masters, ODEQ's Northwest Brownfields Coordinator, will be invited to participate. Qualitative and quantitative performance measures will be established to track progress toward cleanup and redevelopment, including tons of contaminated soil removed and alignment with community feedback on the project throughout redevelopment of the parcels. ACRES will be used to record investments and environmental metrics. To ensure the project is on schedule, status updates on project progress will be incorporated into the City's existing monthly reporting structure. City staff will meet regularly with key partners, like representatives from the target area NAC's, business community, CBOs, and other stakeholders, to discuss progress on project goals, with additional public meetings to address particular concerns.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**4.a. Programmatic Capability- 4.a.i-iii. Organizational Capacity, Structure, and Key Staff:** The City has the expertise necessary to manage an Assessment Grant. Mike Williams, Economic Development Division Manager, will be the city's Project Manager for this grant. Mike has overseen management of the previous two EPA Brownfields Assessment Grants and two EPA Cleanup Grants and has over 25 years of real estate development expertise. He will be responsible for timely and successful expenditure of funds and the completion of all technical, administrative, reporting, and financial grant requirements. The work will be helped by Dan Weinheimer, Interim Community Development Department Director, he will ensure staff and resources are adequate to effectively complete the project and coordinate City staff working on the project, including: Tyler Ryerson, who manages the Development Division, overseeing urban renewal activities in the city; Geoffrey Hunsaker, City Engineer, who manages the Public Works Engineering Division, which is comprised of the traffic, utilities, and survey groups; Debbi Lauchner, Finance Director, oversees financial reporting and federal grant compliance under the Single Audit Act and OMB Circular A-133; Bill Kirby, City Attorney. His legal experience focuses on public contracts, real estate transactions, litigation, and compliance with open records and meetings laws.

**4.a.iv. Acquiring Additional Resources:** Beaverton will hire a qualified environmental professional to support project management and community engagement activities, conduct Phase I and Phase II assessments, and develop cleanup and reuse plans. These services will be solicited using standard procurement practices and in accordance with EPA and federal guidelines. The City's established procedures include seeking statements of qualifications and price proposals that are reviewed by the Project Manager and supervising staff. Contractors who meet or exceed the evaluation criteria, of which

bid price will be a factor, and who are considered to be fully responsible and qualified to perform the work will be selected. The City will give special consideration to local firms and professionals in the hiring and procurement process or to the those who will hire locally. The City is committed to making opportunities for private sector parties, particularly Disadvantaged Business Enterprises. The Beaverton Equity Procurement Program enhances Beaverton's procurement processes to reflect the diversity of its business community by encouraging use of firms certified by the State of Oregon to do business with the city, when applicable, thereby achieving greater racial and gender equity in city contracting. The City aspires to achieve a minimum of 15% participation of firms certified by COBID in its overall dollar amount of contracting and purchasing activities. The city employs the State of Oregon's definitions of COBID certified firms and utilizes its Certification Directory to identify qualified COBID-certified firms.

**4.b. Past Performance and Accomplishments-4.b.i Currently Has or Previously Received an EPA Brownfields Grant:** *(1) Accomplishments:* Beaverton has a history of successfully executing previous EPA Brownfield Assessment and Cleanup grants. Beaverton received a \$400,000 EPA Brownfields Assessment Grant (BF- 00J79901-0) award on August 21, 2013. Three Phase I ESAs and four Phase II ESAs were completed, as well as one CMMP and one ABCA. The City convened a group of community stakeholders to develop and oversee the implementation of a PIP. The City was able to negotiate two Community Benefit Agreements with one of the parties receiving assessment assistance. The grant concluded its term on June 30, 2018, with an ABCA in support of the EPA Cleanup Grant application for the Beaverton Public Safety Center (PSC). The PSC Cleanup Grants (BF- 01J53001-0 and BF-01J53101-0) were awarded on September 18, 2018, with a total of \$400,000 across two adjacent sites affected by petroleum contamination. These grants closed on July 31, 2021 with funds fully expended and construction complete on both the Public Safety Center. On June 5, 2019, Beaverton received a \$300,000 EPA Brownfields Community-Wide Assessment Grant. The City completed nine Phase I ESAs, five Phase II ESAs, and four RBM Surveys at eight sites. Additionally, CMMPs was completed for two sites, one being a site for a future homeless shelter. A PIP was prepared and made available on the City's brownfield website. The grant concluded September 30, 2022 with over 93% of funds expended and a final report will be filed shortly. For all projects, ACRES reporting is up to date.

*(2) Compliance with Grant Requirements:* The 2013 grant focused on completing assessments in employment districts within the boundaries of the Enterprise Zone. Assessment work completed through the grant focused on high-priority redevelopment opportunities that helped advance City objectives of addressing contamination, generating economic development, and providing community benefit. In general, the City's brownfield program complied with the work plan, and the main exceptions were that more grant resources were dedicated to Phase II assessments than planned, and that there was less interest in Phase I assessments than anticipated. Due to staffing changes and delays in targeted projects, the City requested and received a one-year extension to the grant program, continuing work until December 31, 2017. A second extension to June 30, 2018 was granted to allow the completion of one Phase I assessment on a property affected by hazardous materials contamination and two Phase I and Phase II assessments on properties affected by petroleum contamination from a nearby gas station. These assessments, in addition to prior assessments and the PSC ABCA in support of an EPA Cleanup Grant application, completed the grant period with 94% of grant funds spent. The PSC Cleanup Grant was awarded in 2018 and funds were expended in advance of the closing date of the grant due to the construction schedule. Historical review was completed, and we coordinated archaeological oversight at the request of the Confederated Tribes of the Grand Ronde. The grants were completed on time with no extensions. The majority of the 2019 grant was spent on assessments within the culturally diverse community of the Creekside sub-district. The City completed the projects on time without extensions and exceeded their project goals. The project was first set to complete 11 site assessments, the City completed 18 assessments, 9 Phase I ESAs, 5 Phase II ESAs, and 4 RBM Surveys, exceeding the goals set forth in the workplan. The City has a history of timely reporting on grant deliverables and continues to report any developments on previously assessed sites to ACRES on all projects. All are current as of the date of this application.

## **THRESHOLD CRITERIA RESPONSE**

### **1. Applicant Eligibility**

The City of Beaverton is a city in Washington County in the state of Oregon. The City has a municipal charter and was incorporated within the State of Oregon in 1893.

### **2. Community Involvement**

The City will prioritize community involvement to determine sites and determine the types of redevelopments needed in the target area. The City has in place several processes to inform and involve the community and other stakeholders in the planning and implementation of this proposal. The City's Diversity, Equity, and Inclusion (DEI) plan, adopted in 2015, provides the framework to ensure inclusive community engagement for all City initiatives. The City will conduct culturally specific outreach to low income and members of historically underrepresented communities in conjunction with its engagement partner IMPACT Beaverton. Outreach will include virtual meeting options, interpretation services during meetings, and translated written materials. Two City Staff members with robust histories of leading community outreach to underrepresented communities and CBOs in the target area to solicit feedback for city planning efforts will lead engagement and outreach. The Target Area is located in the boundary of the Central Beaverton Neighborhood Action Committee (NAC). Meetings between community members, City staff, and partnering agencies occur monthly and NACs provide the City with a direct communication and outreach channel to the community. Input will also be solicited through NAC-hosted informational sessions, open houses, area specific surveying, online surveying and/or focus groups; all conducted to ensure equitable opportunity for engagement. Virtual meeting opportunities will be available to those who cannot attend in person. The City's website will provide a link for written comment, information on how to attend a meeting, and meetings notes.

### **3. Expenditure of Assessment Grant Funds**

The City of Beaverton does not have an active EPA Brownfield Assessment Grant.

### **4. Contractors and Named Subrecipients**

The City of Beaverton has not procured a contractor in advance of the application and will not be naming any subrecipients to this grant. Contractor procurement will take place after announcement of a grant award and acceptance of the grant award, and will follow all federal, state, and city guidelines for a fair and open bidding process for qualified environmental contractors.