



R10-24-A-004

1. Applicant Identification

City of Kent  
220 4<sup>th</sup> Avenue South  
Kent, Washington 98032

2. Funding Requested

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

3. Location

- a) City of Kent b) King County c) Washington

4. Target Area and Priority Site Information

**Target Areas:**

- Downtown (Census Tract 53033029203)
- Midway (Census Tract 53033029004)

**Priority Site Information:**

- Priority Site 1: Kent City Parking – 47.3794, -122.2341; Kent, WA 98032
- Priority Site 2: Mar A Villa – 23810 30<sup>th</sup> Ave S, Kent, WA 98032

5. Contacts

a. Project Director

William Ellis, Economic Development Officer  
253-856-5454  
[wellis@kentwa.gov](mailto:wellis@kentwa.gov)  
220 4<sup>th</sup> Avenue South  
Kent, Washington 98032

b. Chief Executive/Highest Ranking Elected Official

Dana Ralph, Mayor  
253-856-5700  
[Mayor@kentwa.gov](mailto:Mayor@kentwa.gov)  
220 4<sup>th</sup> Avenue South  
Kent, Washington 98032

6. Population

City of Kent, Washington: 134,392 (US Census: 2017–2021 American Community Survey)



7. Other Factors

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	NA
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
At least 30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area.	NA
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

8. Letter from the State or Tribal Environmental Authority

See attached.

9. Releasing Copies of Applications

Not Applicable.



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

November 2, 2023

William Ellis, Economic Development Officer  
City of Kent  
220 4<sup>th</sup> Avenue South  
Kent, WA 98032

**Re: Ecology Support for the City of Kent's Application for a Community-wide Assessment Grant**

Dear William Ellis:

I understand that the City of Kent (City) will submit an application to the U.S. Environmental Protection Agency (EPA) for a Community-wide Assessment Grant under the Fiscal Year 2024 Brownfields Program grant cycle. If awarded, the City intends to use the funds to complete site assessments focusing on priority sites in two Target Areas. The Downtown Target Area includes a parking lot in the vicinity of active rail lines and known contaminated sites. The Midway Target Area includes a mobile home park with potential hazardous building materials and soils impacts from the Tacoma Smelter Plume.

As a requirement of the application, the City has informed Ecology of their plans to apply for this Assessment grant. Ecology is very supportive of these efforts and this letter is provided to recognize that the City has fulfilled their notification requirement. The Ecology point of contact for any of the potentially affected sites is Kim Wooten in Ecology's Northwest Region Office. Her email address is [Kim.Wooten@ecy.wa.gov](mailto:Kim.Wooten@ecy.wa.gov). For questions regarding this letter or general Brownfields questions, please contact me at (509) 655-0538.

Sincerely,

Ali Furmall  
Brownfields Lead  
WA State Department of Ecology

cc: Terri Griffith, EPA Region 10  
Angel Ip, EPA Region 10  
Kim Wooten, Ecology



**City of Kent, WA  
FY24 Brownfield Assessment Grant  
Narrative**



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

### **a. Target Area and Brownfields** i. Overview of Brownfield Challenges and Description of

Target Area: **The geographic boundary for this project is the city limits of Kent with a target-area focus on Target Area 1: Downtown (Census Tract 53033029203) and Target Area 2: Midway (Census Tract 53033029004). Both target areas are in a Justice40 Disadvantaged Community Census Tract.** The City of Kent (City) had a long history of agricultural production where downtown Kent served as the civic and commercial focus of the city. Incorporated in May 1890, 15 miles south of Seattle, the area prospered from hops and lettuce. In 1899, the first can of Carnation Milk was produced in Kent, and in 1970, the Apollo Moon Buggy was constructed. Kent has since been a mecca of industrial and technological activity, serving as one of the leading warehouse distribution centers in the US. Unfortunately, the City has succumbed to urban sprawl, shifting economic activity away from **Downtown (Target Area 1)**. Industrial development in the area accelerated in 1962 following the completion of Howard A. Hanson Dam, which prevented annual flooding that had plagued the valley surrounding the Green River. Downtown (552 acres) is the commercial center of Kent and is an important intersection between the Green River Valley, East Hill, and West Hill. It is vital to Kent's strategic vision for the future, becoming a thriving mix of retail, business, and residential. A destination itself, the center connects all Kent residents and workers to transit (Sounder Rail Line) and active transportation (Interurban Trail). Woven through Downtown are parks that were created to serve a small town and, later, a suburban Kent. Most of the downtown parks are some of the City's oldest. Reinvestment is needed to replace failing assets, provide quality recreational experiences, serve a high weekday population, and play a key role in supporting the development of a livable, urban downtown core.

**The Midway area (Target Area 2)** contains the commercial spine for Kent's West Hill residents. Highway 99 defines Midway, with commercial, retail, and residential properties surrounding it. The catalyst for the next phase of development in Midway will be the expansion of Sound Transit's light-rail service south from the Seattle-Tacoma International Airport. Kent has been the dumping ground for the City of Seattle, with both the Midway Landfill and Kent Highlands Landfill located west and northwest of Downtown. Midway Landfill was originally a gravel pit that the City of Seattle transformed to a landfill and utilized between 1966 to 1983. Additionally, the majority of the Midway area is part of what is called the Tacoma Smelter Plume. The ARSACO Smelter operated from 1892 to 1986 on the border of North Tacoma and the town of Ruston. Air stack emissions dispersed arsenic, lead, and other heavy metals across a 1,000-square mile area, now called the Tacoma Smelter Plume (TSP). The City is requesting this grant money because they are poorly funded and incapable of proceeding with the assessment and reuse planning of the brownfield sites and target areas. In particular, the lack of discretionary municipal budgets for redevelopment planning staff and community engagement. The Grant will help address these challenges and impacts by providing funds to complete the redevelopment brownfield sites.

ii. Description of the Priority Brownfield Site(s): Through a windshield survey, the City identified **numerous properties** that present a potential hazard to human health and the environment within the **target areas**. These are comprised of vacant lots, automotive repair, and rundown buildings. Although a formal brownfield inventory has not been completed, Washington State Department of Ecology (Ecology) records indicate there are approximately **30 sites with known contaminated releases within the target areas**. This number does not include the many other properties with perceived contamination that are also a challenge to redevelopment. Within Downtown, there are dozens of vacant commercial and industrial buildings, such as a laundromat, gas stations,



warehouses, restaurants, and storage buildings. Within Midway, there are also dozens of properties that have been identified on state and federal brownfield lists.

Within the **Downtown target area**, the priority site is **Kent City Parking** (0.88 acre), which is a parking lot in close proximity to the Kent Library, restaurants, and retail shops. Before it was a parking lot, this site was developed with an armory and commercial buildings. Its location is one block from the active rail line and a state cleanup site creates several potential sources of contamination. In general, fuel combustion (petroleum), track abrasion (heavy metals), and freight leakages cause the most soil impacts. **Contaminants of concern are petroleum hydrocarbons such as oil and gasoline and heavy metals such as lead, arsenic, cadmium, chromium, and mercury.** The parking lot is being assessed because the City would like to revitalize it with potential commercial and residential redevelopment with greenspace. **The City has received site access from the property owner for assessment.**

Within the **Midway target area**, the **Mar A Villa** mobile home park (1.28-acres) sits approximately 0.48 mile from the Midway Landfill and is unfenced. The site has been a mobile home park since 1965. Prior to that, it was undeveloped land. The 20 mobile homes on this parcel are slated to be demolished, and asbestos and lead-based paint are a concern. In addition, the site is located within the TSP and may require surficial soil sampling and remediation for lead and arsenic. Contaminants of concern are asbestos, lead-based paint, lead, and arsenic. The City would like to redevelop the site into an affordable housing development with a high walkability score. **The City has received site access from the property owner for assessment.**

iii. Identifying Additional Sites: The City will work in conjunction with identified project partners and residents to identify and prioritize brownfield sites based on need throughout the target areas. When the target areas have been completely addressed with brownfield funding, the City will work to identify additional sites throughout their geographic boundary. A brownfield site inventory and evaluation ranking criteria will be created as a part of this grant project. Readily accessible environmental, public health, and other records will be reviewed to determine whether any of the sites being considered for assessment might represent an imminent threat to public health or welfare. The City will use US Census data and the CEJST tool to determine an area's financial need and to determine if the site is in a Justice40 census tract.

**b. Revitalization of the Target Area** i. Reuse Strategy and Alignment with Revitalization Plans: The Midway Subarea Plan<sup>1</sup> and the Downtown Subarea Plan<sup>2</sup> both encourage transit-oriented development. The vision for Midway is a new direction toward a walkable, compact community, consisting of a mix of uses that thrive in an economically and environmentally sustainable future supported by high-capacity transit. The vision for Downtown is a dense, mixed-use urban center that complements transit. Design standards to increase the livability throughout Downtown focus on a human scale of streets and structures. There is a wide variety of housing types in the Downtown. The economic development elements support the creation of jobs and bringing a mix of services and housing into the urban center. According to the Downtown Subarea Plan, business and industry stakeholders support the overall strategic goal to “[p]osition Downtown as a complete community by integrating quality residential development and continuing to support Downtown as a destination.” Downtown is in need of affordable housing, commercial redevelopment and greenspace, of which the **Kent City Parking Priority Site** is an ideal candidate.

Although there is significant single-family housing to the east and west, there is little housing within the Midway area itself, and all could be considered affordable. This is anticipated to change

<sup>1</sup> City of Kent Midway Subarea Plan; 2012

<sup>2</sup> City of Kent Downtown Subarea Action Plan 2013



with the opening of the light rail system in 2026, but contamination poses a risk to redevelopment. Housing is key to the success of the transit-oriented communities anticipated in the Midway target area. The City's first goal for housing is to "promote a diversity of housing types that supports a full range of incomes and household structures within the Midway Subarea."<sup>3</sup> Increased housing and retail options will help improve living conditions in struggling portions of the city and near planned redevelopment neighborhoods and attract additional service and retail development, revitalizing portions of the City and further increasing the tax base. The City recognizes the ideal reuse for the **Mar A Villa Priority Site** is affordable housing redevelopment.

ii. Outcomes and Benefits of Reuse Strategy: The City is committed to creating a working combination of sustainable development and economic growth while eliminating contamination impacts and improving residents' health. The City has a target growth of 32,000 new jobs and 10,200 new housing units by 2031.<sup>4</sup> The City will encourage target-area redevelopment to use **energy-efficient sources and renewable energy, including solar, wind, and/or renewable natural gas as part of its redevelopment strategy**. The City anticipates that residential development resulting from brownfield redevelopment will attract people from surrounding areas, which will diversify the City's workforce, attract additional service and retail development, and further revitalize the area. It will provide housing for higher-wage earners who have worked but traditionally have not resided in Kent, easing transportation emissions and congestion.

**Kent City Parking Priority Site** will be redeveloped into **greenspace** or **affordable housing** (non-economic). This development will **create jobs** (economic) as well. Redevelopment of the **Mar A Villa Priority Site** into a residential-mixed use building will facilitate the **creation of jobs** (economic), **affordable housing** (noneconomic), and potential for **mixed services** (economic).

The City understands the importance of **climate change** and will actively incorporate climate adaptation into redevelopment plans. Downtown Kent has a high **projected flood risk** within the next 30 years, with the target area in the **94<sup>th</sup> percentile for projected flood risk**. In addition, both Downtown and Midway are in the **99<sup>th</sup> percentile for expected population loss rate** from injuries resulting from natural hazards each year. The Brownfield Assessment Grant will allow Kent to address hazardous, dilapidated sites throughout the target areas.

**b. Strategy for Leveraging Resources** i. Resources Needed for Site Reuse: The City will apply for an EPA Brownfield Cleanup Grant for the remediation of brownfield sites to expand affordable housing opportunities. The City could also use funding from an EPA Brownfield RLF Grant (up to \$1,000,000) for the remediation of brownfield sites and to contribute to affordable housing initiatives and expand housing opportunities. The City has recently used resources that include a \$100,000 Housing Action Plan grant and \$125,000 Housing Action Plan Implementation grant for housing plans and redevelopment for housing needs. The City is currently working on contracting for another \$75,000 grant to implement middle housing options throughout the City. The City also successfully completed grants from the Puget Sound Regional Council (PSRC) for transportation projects, ranging from \$10–15 million every two years. Additionally, the City has received a Comprehensive Plan Update Grant for future use planning. These funds go hand in hand with our brownfield strategy of housing development. Community Development Block Grant (CDBG) funding will be pursued to address blight via demolition during site redevelopment.

ii. Use of Existing Infrastructure: Substantial infrastructure investment has been made in both target areas, especially as it relates to roadways supporting multiple modes of transportation and

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<sup>3</sup> City of Kent Comprehensive Plan 2015

<sup>4</sup> King County Growth Targets - Adopted December 21, 2021; Ordinance 19384



right-sizing utilities to prepare for growth. In the event additional infrastructure needs arise, the City will apply for federal and state funding to ensure redevelopment can flourish.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

a. **Community Need** i. The Community’s Need for Funding: Kent is the least-funded City in King County. King County ended their brownfields programs some years ago, and south King County cities like Kent typically have revenues a fraction of neighboring jurisdictions in the north part of the county. Most of Kent’s monies go to keeping up basic services, and there are no remaining funds for community

	DT	Midway	State <sup>6</sup>
Per Capita Income	\$30,176	\$19,842	\$43,817
Median Household Income	\$72,426	\$41,921	\$82,400
Population	4,312	4,860	

development visioning, planning, or other proactive local government activities to accompany federal investments in transit. As referenced in the table above, the target areas’ combined **population is 9,172**, considerably smaller and disadvantaged compared to the city limits. The **target areas’ populations are impoverished** as they are economically depressed areas as shown by a **low median household income and per capita income** compared to the state average. In addition, the target areas are in the 91<sup>st</sup> percentile for low income and 78<sup>th</sup> percentile for unemployment, 93<sup>rd</sup> percentile for less than a high school education in the state, reiterating the underserved community is in need of revitalization.<sup>5</sup> Growing a strong future economy is dependent in part on making certain that there is quality and affordable space where businesses can continue to grow. As the City is nearly fully developed, most new commercial and residential development will involve the assessment of brownfields throughout the target areas.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: With a target area that is **disadvantaged** and overwhelmed with an **underserved** population, making vital

	DT	Midway	US <sup>6</sup>
Nonwhite Minorities	47%	73%	31%
Hispanic/Latino	21%	42%	18%
Asian	11%	15%	6%
Unemployment Rate	4%	12%	6%
SNAP/Food Stamps	17%	40%	11%
All people in poverty	14%	37%	13%
All families in poverty	8%	31%	9%
All people under 18 years old in poverty	29%	55%	17%
Female head of household w/ kids 18 and younger in poverty	45%	50%	34%

improvements to the area for our sensitive populations is critical. Within the target area, the sensitive populations include **nonwhite minorities, youth, impoverished, and residents on government assistance**. The table to the left provides information about **welfare issues such as low income, high unemployment, and reliance on government assistance**.

The redevelopment of both priority sites into a **green space and affordable housing** development will address **welfare issues** plaguing the city. The **lack of affordable housing** within the target areas is affecting the residents. Within the target area, the average monthly rent is \$1,418 (US \$1,163), and the average median value of a home is \$329,500 (US \$244,900).<sup>6</sup> With the high cost of monthly rent and high home values, the community is suffering as a significant portion of their annual income goes to cover

housing costs. The target areas are in the **91<sup>st</sup> percentile of low-income households spending more than 30% of their income on housing**.<sup>7</sup> The Environmental Justice (EJ) Screen Report **Lead Paint Indicator** reports the target area is in the **63<sup>rd</sup> percentile** in the state.

<sup>5</sup> EJ Screen Report  
<sup>6</sup> US Census: 2017-2021 American Community Survey  
<sup>7</sup> CEJST





Through **assessment** and subsequent **redevelopment** or revitalization of potential brownfields sites, the risks facing these vulnerable and **underserved** populations will be reduced. By allowing residents **access to affordable housing, maintaining green space, and creating new local jobs**, this Brownfield Project can help break the cycle of poverty and despair for the families of Kent.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Sensitive populations face more significant risks of disease and health conditions such as **low life expectancy and asthma** because of conditions present at brownfield sites. According to CEJST, both Midway and Downtown target areas are in the **96<sup>th</sup> percentile of proximity to Superfund sites**. In the Midway area, they are in the **93<sup>rd</sup> percentile of asthma diagnosis**, and in Downtown, they are in the **70<sup>th</sup> percentile**.<sup>8</sup> Kent residents also have a higher percentage of uninsured residents and lack of access to health care. According to the Washington State Department of Health, nearly 100 people die each year due to asthma in the state (local statistics not available). About one in 8 Kent residents have asthma; however, the illness is rampant throughout racial and gender groups. Women are significantly more likely than men to have asthma. Additionally, people with lower household incomes, like some residents of Kent, are twice as likely to have asthma as residents who make more than \$50,000/year.<sup>9</sup> The target areas' average asthma rate of 11.4 is well above the US average of 10 per 100,000.<sup>8</sup> With the assessment of brownfield areas, we can hope to see the environment and health of the residents improve. Removing blighted properties will make way for building resourceful and beneficial buildings, and green space will benefit the residents for generations to come. Lead paint and asbestos exposure typically associated with aging structures pose increased risks to sensitive populations, especially for the target areas' children-living-in-poverty residents. The Midway target area ranks in the **79<sup>th</sup> percentile in the state for lead-paint indicator**.<sup>8</sup> Lead exposure can result in severe health and developmental consequences in infants and children, and asbestos exposure can result in many forms of cancer and breathing problems such as asthma. To make matters worse, Downtown and Midway are on average in the 93<sup>rd</sup> percentile for diesel particulate matter exposure.<sup>8</sup> **Lead and arsenic in surficial soil** is a problem in the Midway area. Midway is located in an area with possible arsenic in surficial soil at concentrations ranging from 40 to 100 mg/kg. Children are especially vulnerable because they are still growing and are more likely to accidentally swallow contaminated dirt or dust. This type of pollution, called area-wide soil contamination, puts many communities at risk. Scientists have linked long-term exposure to arsenic to a variety of health problems including heart disease, diabetes, and cancer. In children, lead can cause behavior problems and reduced physical growth. In adults, lead can increase blood pressure, affect memory, and contribute to other health problems. According to the Washington State Department of Health, approximately **3.08% of children who were tested in King County had levels of lead in their blood above 5 micrograms of lead per deciliter of blood**, which is the second highest in the state. This also decreases the ability to get fresh food through gardening without serious consideration for the soil. With all these problems, the target area is in the **73<sup>rd</sup> percentile for low life expectancy**.<sup>8</sup>

(3) Environmental Justice (a) Identification of Environmental Justice Issues: The target areas have many abandoned or blighted properties that are an ongoing environmental threat for residents. The **two priority sites** confirm negative consequences, including **decreased taxable revenue, decreased property values, and reduced ability to market properties for redevelopment**, and EJ issues such as **low income, high unemployment, substandard housing, lack of transportation options, and distressed neighborhoods**.<sup>10</sup> Both priority sites are in **Justice40**

<sup>8</sup> EPA EJ Screen

<sup>9</sup> <https://www.seattlepi.com/seattlenews/article/Ranked-Where-asthma-hits-hardest-in-the-11148227.php>

<sup>10</sup> Justice40 Memorandum – White House



**Disadvantaged Communities.** The EPA EJ Screening Report shows the target areas (average) are in the 92<sup>nd</sup> percentile for people of color, 78<sup>th</sup> percentile for unemployment rate, and 91<sup>st</sup> percentile for low income in the state. The sprawl away from the Downtown target area over the last century has enhanced the path to poverty and lack of housing. The abandoned and impacted properties have led to exposure of environmental contaminants. Focusing on the Biden Administration’s Justice40 Initiatives, the Brownfield Assessment Grant will address several EJ issues plaguing this community by reducing the **EJ burden, decreasing the number of abandoned and blighted properties, creating new and affordable housing, and creating new jobs for the community.** Redevelopment of the Kent City Parking and Mar A Villa priority site into affordable housing will not only have a strong benefit for the community in the short term, but also the revitalization is shoring up success for generations to come.

(b) Advancing Environmental Justice: Site reuses will advance EJ by creating affordable places for people to live, creating jobs, and improving the health of residents. Both the priority sites and potential additional sites are ripe for redevelopment that will benefit residents. **As the Kent City Parking priority site is a parking lot, it will not displace any current residents or businesses among the underserved communities. The Mar A Villa priority site will displace around 20 homes, but with the development of affordable housing, the City will ensure residents have housing available to them.** The city will work with the residents to help them relocate. The City requires mobile home park owners to create a relocation plan and implement the program in multiple languages to serve the residents. Advanced warning (12-36 months) is required before closure. Addressing the EJ issues will improve the health and well-being of disadvantaged populations and increase the value of the city and the lives of residents living in it. Revitalizing the areas where sensitive populations live will improve socioeconomic justice issues.

**b. Community Engagement i. Project Involvement & ii. Project Roles**

<b>Name of Org.</b>	<b>Point of Contact</b>	<b>Specific involvement in the project or assistance provided</b>
Kent Downtown Partnership (KDP)	Gaila Hass 253-813-6976	This 501(c)(3) nonprofit promotes the vitality of civic life and revitalization of historic buildings in the oldest blocks of the city’s historic core downtown area. KDP will assist with <b>future reuse planning.</b>
Mother Africa	Risho Sapano 253-249-8811	Based in Kent with an environmental justice concern for their communities, this grassroots nonprofit provides services and skills training necessary for refugee/immigrant women and children in Washington to reach their highest potential. Mother Africa will help with <b>identification of sites.</b>
World Relief	Medard Ngueita 253-277-1121	World Relief is a non-profit that welcomes refugees to Western Washington - following a philosophy of co-empowerment and listening to the community. They will assist with <b>outreach.</b>
Sound Transit	Thatcher Imboden 206-398-5459	Sound Transit is building a light rail system with a station in the Midway Area of Kent. They will assist with <b>future land use planning and community outreach/education.</b>

iii. Incorporating Community Input: The City plans to communicate project progress to the local community, the underserved communities, and residents/groups directly affected by the project through various meetings. During the Land Use and Planning Board meeting on September 26, 2023, and at the City Council meeting on October 19, 2023, the City’s Brownfield Project Team informed residents of the City’s intent to apply for EPA Grant funding. The City understands the importance of working closely with community members to cultivate productive and thought-stimulating interactions and will listen to residents and community partners and consider their most urgent needs and visions. With this in mind, the City plans to hire one or more community-based organization(s) to act as a community liaison during outreach, to ensure community members’ goals and interests are reflected in the sites planned for assessment and reuse. The City has an



Equity Strategic Plan and expansive efforts for the Comprehensive plan and Downtown Subarea Plan Updates, which this project will build from. The City will create a Community Engagement Plan (CEP) that will provide an outline of planned community engagement activities, schedule of events, project history, and key players and will be made available for review at City Hall and on the City’s website.

To identify potential target-area brownfield sites, the City will perform community outreach through local channels and will review suggested brownfield sites and any concerns or comments provided by community members during quarterly meetings. Project comments and community input will be reviewed and evaluated by the Brownfield Project Team during quarterly meetings, and minutes recording all community member suggestions and information will be posted on the City’s Brownfield Program webpage. The Brownfield Project Team will maintain a site inventory of suggested brownfield sites and will review the list routinely with it being updated at each quarterly meeting. The community and Brownfield Project Team will work together to prioritize sites based on community need and the City’s Brownfield Program goals. Priority will be given to those sites that most benefit target-area sensitive populations. As for other comments and concerns, the City will respond to those residents individually within two weeks of receipt of their comment.

As part of the CEP, several forms of media will be used to disseminate project information. Brownfield Grant updates will be posted to the City website and Facebook page. The City will update organizations and community members through City Council meetings, community education meetings, and charrettes/visioning sessions. All promotional materials and the names and contact information of the City’s Brownfield Program Team members will be posted on the City’s brownfield webpage (to be created), allowing community members to make direct contact with Brownfield Program Team members.

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

**Description of Tasks/Activities and Outputs:**

<b>Task 1: Outreach</b>	
i.	<i>Project Implementation:</i> The City’s Brownfield (BF) Project Manager will develop a Community Engagement Plan (CEP), outreach materials, BF Project website, and social media posts with the assistance of the environmental contractor (EC). City staff will lead the community meetings to keep the public informed about project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software to manage the grant. The City plans to hire one or more community-based organization(s) to act as a community liaison.
ii.	<i>Anticipated Project Schedule:</i> CEP created in 1 <sup>st</sup> quarter. Community meetings held 1 <sup>st</sup> & 3 <sup>rd</sup> quarters during Years 1–3 and 1 <sup>st</sup> quarter during Year 4. Website and outreach materials created in the 1 <sup>st</sup> quarter and posted monthly throughout the grant project. Hiring a community liaison within the first six months of award.
iii.	<i>Task/Activity Lead:</i> City: Kristen Holdsworth, Long Range Planning Manager, BF Project Manager
iv.	<i>Outputs:</i> CEP, BF Website, 7 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports. Hiring a community liaison.
<b>Task 2: Site Inventory</b>	
i.	<i>Project Implementation:</i> The City’s BF Project Director will work with target-area residents during community meetings to create a thorough site inventory for assessment. Abandoned and underused properties identified by target-area residents will be researched further by City staff using the property appraiser's website. Once a list is compiled, the EC will work with City staff to create an evaluation ranking tool to determine, with the help of residents, the order in which the sites will be addressed.
ii.	<i>Anticipated Project Schedule:</i> Community meeting held in the 1 <sup>st</sup> quarter will continue the preliminary inventory process that began with this application. Evaluation ranking in the 2 <sup>nd</sup> quarter and continuing throughout grant.
iii.	<i>Task/Activity Lead:</i> City: William Ellis, Economic Development Officer, BF Project Director
iv.	<i>Outputs:</i> Evaluation Ranking Tool, Site Inventory List
<b>Task 3: Assessment</b>	



**City of Kent, Washington  
FY2024 US EPA Brownfields Assessment Grant**

i.	<i>Project Implementation:</i> The EC will conduct Environmental Site Assessment (ESA) activities at sites selected and ranked through the Site Inventory Task, starting first with the two priority sites listed in this application. ASTM-AAI compliant Phase Is; Generic Quality Assurance Project Plan (QAPP); Phase IIs include SS-QAPP. Prior to assessment, site access agreements and property eligibility determinations approval will be obtained.
ii.	<i>Anticipated Project Schedule:</i> Assessment activities begin in 2 <sup>nd</sup> quarter and continue throughout the grant.
iii.	<i>Task/Activity Lead:</i> The consultant will implement the technical aspects of the project with oversight from the City: William Ellis, Economic Development Officer, BF Project Director.
iv.	<i>Outputs:</i> 13 Phase I ESAs, 1 Generic QAPP, 8 Phase II ESAs including SS-QAPP, Site Access Agreements and Property Eligibility Determinations.

**Task 4: Remediation/Reuse Planning**

i.	<i>Project Implementation:</i> For projects identified for cleanup, the EC will prepare the Analysis for Brownfields Cleanup Alternatives (ABCA) and/or Cleanup Plans. Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs, and determining site appropriate remediation and/or reuse planning to reduce health/environmental risks. The EC will assist the City in hosting charrettes/visioning sessions to be held for key properties. A planner will create a BF Revitalization Plan and Site Reuse Assessment.
ii.	<i>Anticipated Project Schedule:</i> Plans & Charrettes begin in the 6 <sup>th</sup> quarter and will continue throughout the grant.
iii.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with oversight from the City: Kristen Holdsworth, Long Range Planning Manager, BF Project Manager.
iv.	<i>Outputs:</i> 5 ABCAs, 3 Vision Sessions/Charrettes, 1 Site Reuse Assessment, 1 BF Rev. Plan

**Task 5: Programmatic Support**

i.	<i>Project Implementation:</i> The City will procure an EC to assist with the BF Grant Project. The City’s BF Project Director oversees grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The EC will assist the City in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. The City staff travel budget allows for two staff to attend three national/regional/grantee BF training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting begins 1 <sup>st</sup> quarter. Quarterly Reporting begins 2 <sup>nd</sup> quarter and continues throughout the grant. Annual Reporting & Forms created in the 5 <sup>th</sup> , 9 <sup>th</sup> , 13 <sup>th</sup> quarters and final closeout.
iii.	<i>Task/Activity Lead:</i> City: William Ellis, Economic Development Officer, BF Project Director
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Annual Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend three conferences.

**b. Cost Estimates:** Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks.* The budget for this project includes travel, supplies, and contractual costs only. **Fifty-eight percent (58%) of the budget will be spent on site specific work through the Assessment Task.** **Task 1 Outreach:** Contractual: CEP \$4,000 (32hrs x \$125), BF Website, Outreach Brochure/Handouts, Social Media Posts \$3,000 (24hrs x \$125), 7 Community Education Meetings \$7,000 (56hrs x \$125; \$1,000/meeting). Supplies: Outreach Supplies \$1,000 (printed brochures \$1.00/each; Paper (\$15/pack), printed display boards \$100/each; notebooks, post-it notes, pens, other miscellaneous office supplies \$300). Other - Community Liaison: Community-based organization(s) to act as a community liaison during outreach \$6,000 (75hrs x \$80) **Task 2 Site Inventory:** Contractual: Potential Brownfield Site Inventory and Evaluation Ranking Tool Creation \$7,500 (60hrs x \$125). **Task 3 Assessment:** Contractual: 13 Phase I ESAs \$4,000 each for a total of \$52,000; 1 Generic QAPP \$5,500; 8 Phase II ESAs including SS-QAPP at \$29,000 each for a total of \$232,000. **Task 4 Remediation/Reuse Planning:** Contractual: 5 ABCAs \$8,000 for a total of \$40,000; 3 Vision Sessions/Charrettes \$6,000 (\$2,000/meeting). 1 Site Reuse Assessment Plans at \$30,000 each for a total of \$30,000 (Planner: 100hrs x \$150; Market Analysts: 70hrs x \$125; Environmental Professional: 50hrs x



\$125); 1 Brownfields Revitalization Plan \$70,000 (Planner: 240hrs x \$150; Market Analysts: 136hrs x \$125; Environmental Professional: 136hrs x \$125). **Task 5 Programmatic Support:** Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period \$24,000 (192hrs x \$125). Travel: Two staff to attend three conferences \$12,000 (flights at \$800, 3 nights in hotel at \$300/night, incidentals/per diem at \$100 [3 days] x 2 attendees x 3 events).

Category	Tasks					Totals
	Outreach	Site Inventory	Assessment	Remediation/Reuse Planning	Programmatic Support	
Travel					\$12,000	\$12,000
Supplies	\$1,000					\$1,000
Contractual	\$14,000	\$7,500	\$289,500	\$146,000	\$24,000	\$481,000
Other: Community Liaison	\$6,000					\$6,000
<b>Total Budget</b>	<b>\$21,000</b>	<b>\$7,500</b>	<b>\$289,500</b>	<b>\$146,000</b>	<b>\$36,000</b>	<b>\$500,000</b>

**c. Plan to Measure and Evaluate Environmental Progress and Results:** To ensure this EPA Brownfield Project is on schedule, the City internal Brownfields Team, which will include the EC, will meet quarterly to track all **outputs identified in 3.a.** using an Excel spreadsheet and will report all progress in fulfilling the scope of work, goals, and objectives to the EPA via quarterly reports. In addition, project expenditures and activities will be compared to the projects schedule to ensure the grant project will be completed within the four-year time frame. Site specific information will be entered and tracked in the ACRES database. The outputs to be tracked include the number of neighborhood meetings, public meetings, website and social media engagement, meetings with community groups and community partners, environmental assessments, ABCAs, and cleanup redevelopment plans. The outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created. If the project is not being completed in an efficient manner, the City’s has countermeasures in place to address this problem; such as monthly calls to their EPA Project Officer.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability** i. Organizational Capacity, ii. Organizational Structure, & iii.

Description of Key Staff: The City of Kent has experienced and project-tested staff who will ensure sound technical, financial, project, and assessment management. The City has a history of successful grant project management as displayed through their many federal and state grant awards. The following City staff has decades of combined experience resulting in the grant project management skills necessary to successfully manage this Brownfield Grant. The staff outlined below will ensure the timely and successful expenditure of funds and completion of all technical, administrative, and financial requirements. **William (Bill) Ellis, Economic Development Officer**, has been with the City for nine years and has supported earlier planning project efforts for community brownfields. He also served three years as program director for “Lane Livability” community brownfield Grant in Eugene, Oregon. For this Grant project, he will serve as the **Brownfield Program Director** and ensure timely, quality reporting in compliance with the cooperative agreement. **Kristen Holdsworth, Long Range Planning Manager**, has been with the City for one year and has over 15 years of experience in the planning field. Ms. Holdsworth will provide day-to-day operational support to this project as the **Brownfield Program Manager**. **Rhonda Bylin (Finance)** is the Planning Administration Supervisor for the Economic and Community Development department. She has worked for the City over eight years and manages the department’s finances, including the budget, invoices, grant administration, etc. For this



project, she will serve as the **Brownfield Finance Director** and will be responsible for oversight of financial reporting and ASAP.gov drawdowns to ensure all expenditures are captured appropriately and accurately. The City will procure an environmental contractor (EC) to assist with the technical portions of the project.

iv. Acquiring Additional Resources: Using local contracting requirements and procurement processes, the City will procure a qualified EC to assist with technical and reporting portions of the Brownfield Community-wide Assessment, in addition to any other contractors needed to complete the project. The City will ensure compliance with the EPA's "Professional Service" procurement process. Staff will work with the Purchasing Department to prepare a Request for Proposals (RFP), advertise the RFP, review proposals, and reach consensus on the selection of an EC and planning firms. The City will implement strong labor practices, hiring local members of the community when possible. The City has a "buy local" policy for procurement and will link members of the community to potential employment opportunities for all brownfield-related redevelopment via community outreach practices and updates to project partners.

**b. Past Performance and Accomplishments** i. Currently Has or Previously Received an EPA Brownfields Grant: (1) Accomplishments: The City was awarded an Assessment Grant in 2012 in the amount of \$400,000. According to City records, 4 "Phase I Lights," 2 Phase I ESAs, and 2 Phase II ESAs were conducted while assessing approximately 24 acres of land. The Maralco Site is one of the most significant brownfields in the city and one of the worst and most prolonged in the State of Washington. The site had been vacant since 1986 when bankruptcy closed the smelter. The property carried \$3 million in liens from Ecology, King County, the City, and lenders. The City completed a Phase I ESA, Phase II ESA, and Cleanup Planning activities at the property. The City brought together stakeholders, moved the ESA/Cleanup Planning forward, and investigated additional sources of funding for assessment/cleanup/reuse. As a result of this effort, the owners removed the lien and sold the property, and it is now in clean-up and redevelopment by Bridge Development for cold storage. This successful conclusion was reached due to the City's initial work in identifying a solution, the property no longer being underwater, and identifying property descendants and giving them a strategy for creek relocation to help usable acreage. In addition, as a part of this Grant, the City completed Phase I and Phase IIs on the 10-acre Cancer Care site, using leveraged private funding to offset costs of the ESAs. Chlorinated pesticides were identified in the soil. The City also conducted extensive work across the street to investigate groundwater petroleum impacts in the right-of-way. The remediation of this work led to 350 units of new housing at the Midtown 64 project.

(2) Compliance with Grant Requirements: As part of the 2012 Assessment Grant, the City completed 18 Quarterly Progress Reports; 5 Semi-Annual/Annual Disadvantaged Business Enterprise (DBE) Reports; regular updates to ACRES through June 2017; final DBE Report, Final Federal Financial Report, and the EPA Grant Final Report. Over the course of the project, the City held various kick-off meetings, areawide planning (AWP) meetings, and site-specific assessment and cleanup/reuse planning meetings with various stakeholders including the EPA, Ecology, property owners, developers, and local businesses. Complications regarding planned Phase II ESA and cleanup/reuse planning work at the former Maralco Aluminum Smelter site (such as ownership, existing liens, bankruptcy conditions, and remediation costs) were identified during the Phase I ESA, and stakeholder meetings were conducted shortly after discovery. Work was postponed at the site while the City explored options such as receivership, insurance recovery, and facilitating a property sale to resolve these issues. Thus, the grant timeline was extended through 2017. All funds were expended with all project information reported in ACRES on time.



**City of Kent, WA  
FY24 Brownfield Assessment Grant  
Threshold Criteria**



## Threshold Criteria

### 1. Applicant Eligibility

- a. The City of Kent, Washington, is eligible to apply for the EPA Brownfields Community-wide Assessment Grant as a unit of local government as defined under 2 CFR § 200.64.
- b. The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

### 2. Community Involvement

The City plans to communicate project progress to the local community, the underserved communities, and residents/groups directly affected by the project through various meetings. During the Land Use and Planning Board meeting on September 26, 2023, and at the City Council meeting on October 19, 2023, the City's Brownfield Project Team informed residents of the City's intent to apply for EPA Grant funding. The City understands the importance of working closely with community members to cultivate productive and thought-stimulating interactions and will listen to residents and community partners and consider their most urgent needs and visions. With this in mind, the City plans to hire one or more community-based organization(s) to act as a community liaison during outreach, to ensure community members' goals and interests are reflected in the sites planned for assessment and reuse. The City will create a Community Engagement Plan (CEP) that will provide an outline of planned community engagement activities, schedule of events, project history, and key players and will be made available for review at City Hall and on the City's website.

To identify potential target-area brownfield sites, the City will perform community outreach through local channels and will review suggested brownfield sites and any concerns or comments provided by community members during quarterly meetings. Project comments and community input will be reviewed and evaluated by the Brownfield Project Team during quarterly meetings, and minutes recording all community member suggestions and information will be posted on the City's Brownfield Program webpage. The Brownfield Project Team will maintain a site inventory of suggested brownfield sites and will review the list routinely with it being updated at each quarterly meeting. The community and Brownfield Project Team will work together to prioritize sites based on community need and the City's Brownfield Program goals. Priority will be given to those sites that most benefit target-area sensitive populations. As for other comments and concerns, the City will respond to those residents individually within two weeks of receipt of their comment.

As part of the CEP, several forms of media will be used to disseminate project information. Brownfield Grant updates will be posted to the City website and Facebook page. The City will update organizations and community members through City Council meetings, community education meetings, and charrettes/visioning sessions. All promotional materials and the names and contact information of the City's Brownfield Program Team members will be posted on the City's brownfield webpage (to be created), allowing community members to make direct contact with Brownfield Program Team members.

### 3. Expenditure of Existing Grant Funds

The City of Kent affirms it does not have an active EPA Brownfields Assessment Grant or Multipurpose Grant.





4. Contractors and Named Subrecipients  
Not Applicable.