



R10-24-C-004

EPA Brownfield Cleanup Grant Narrative Information Sheet

1. Applicant Identification:

City of Eugene, Oregon
101 W. 10th Avenue, Suite 203
Eugene, OR 97401

2. Funding Requested:

- (a) Grant Type: Single Site Cleanup
- (b) Federal Funds Requested: Requested Amount: \$1,526,847

3. Location:

- (a) City: Eugene
- (b) County: Lane County
- (c) State: Oregon

4. Property Information:

Trainsong Park
2775 Edison Street, Eugene, Oregon 97402

5. Contacts:

- (a) Project Director:
Emily Proudfoot
Principal Landscape Architect
City of Eugene, Parks and Open Spaces
541-682-4915
Eproudfoot@eugene-or.gov
1820 Roosevelt Boulevard, Eugene, OR 97401

- (b) Chief Executive/Highest Ranking Elected Official:

Name: Mayor Lucy Vinis
Phone: 541-682-5010
Email: lvinis@eugene-or.us
Site Mail: 99 W. 10th Ave, Eugene, OR 97401

6. Population: Eugene, Oregon, 2021 U.S. Census population 173,000.



7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Narrative Page 2
The proposed site(s) is adjacent to a body of water (i.e., the border of the 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).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	N/A
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	N/A
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.	N/A

8. Releasing Copies of Applications: Not applicable

1. Project Area Description and Plans for Revitalization

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

The City of Eugene (City) requests \$1,526,847 for a U.S. Environmental Protection Agency (EPA) Brownfields Cleanup grant to remediate contaminated soil in a neighborhood park that occupies seven tax lots (17042612400, 170426123100, 170426123200, 170426123300, 170426123301, 17042621100, and 170426215400) at Trainsong Park, 2775 Edison Street, Eugene, Oregon 97402 (the Site).

The Site, Trainsong Park, is in census tract 41039004200 (CT 42, the Target Area) in metropolitan Eugene. The triangular Target Area encompasses all of CT 42, also known as the Trainsong Neighborhood. The Target Area is a low-income neighborhood, with a large proportion of renters (80.6 percent, according to [2020 Census data](#)). [Land uses in the Target Area](#) include R-1 Low-Density Residential (approximately 40%), I-2 Light-Medium Industrial (approximately 40%), some R-3 Limited High-Density Residential (approximately 10%), with the rest small amounts of I-3 Heavy Industrial and C-2 Community Commercial (City of Eugene 2023). The Target Area is surrounded by multiple-lane highways and major arterial roads, railroad rights-of-way (ROWs) in use since at least the 1930s, and heavy industrial lands. Because these hard barriers wrap around CT 42, the entire census tract constitutes the Target Area.

U.S. Department of Transportation [Federal Railroad Administration data](#) show that 12 trains pass by the Target Area each day. Commercial and industrial sites (that have included wood treating and wood preserving since the 1940s and 50s) are present in the Target Area and neighborhoods surrounding Trainsong Park (USDOT 2023). A cleanup site listed by the Oregon Department of Environmental Quality (DEQ), the [J.H. Baxter & Co. site](#), is 0.7 miles southwest of the park (DEQ 2019). In 2010 the Oregon Health Authority (OHA) [conducted assessments for vapor intrusion from contaminated groundwater](#) in the Target Area and a 2019 DEQ [record of decision required a remedy to address groundwater contamination](#) by volatile organic chemicals from the multitrack rail ROW east of the park (OHA 2010, DEQ 2019). Findings from OHA's [Environmental Health Assessment Program March 2023 report](#) for the residents in the Target Area found dioxin concentrations in the soils in seven neighborhood backyards “could harm the health of children under six years of age” if they had regular contact with the soils in their yards (OHA 2023).

A 2013 [walkability survey](#) in the Target Area found that the industrial land uses, presence of multi-lane major roads, and rail ROWs were physical barriers that “prevent certain land use types from being used” and that there are few destinations accessible on foot to attract pedestrians (Spradling 2013). In addition, most residential streets in the Target Area do not have sidewalks, forcing pedestrians to use the road surface (Google Maps 2023). Trainsong Park, however, is just a 10–15-minute walk for the farthest residents in the Target Area and easily accessible for those who live within a few blocks. The next-closest parks are at least 25 minutes walking distance away and access to those parks requires pedestrians or cyclists to cross at least one four-lane state highway, major road, and/or a rail ROW without a traffic signal (Google Maps 2023). The City of Eugene's service area for a neighborhood park is defined as within ½ mile safe walking distance, making Trainsong Park the only option for serving Trainsong neighborhood residents. In short, **the people in this physically isolated Target Area have experienced a myriad of environmental and socioeconomic burdens for decades and they live in one of the most disadvantaged areas in not only the state of Oregon but also the country. The Site, Trainsong Park, is the only chance for residents to recreate and experience the health and social benefits** available from access to a fully functioning park.

ii. Description of the Proposed Brownfield Site

The 5-acre Trainsong Park includes a skate park, playground, tot lot (play area for children), ball field, basketball courts, picnic tables and benches, and walking paths. The City purchased the land in a series of acquisitions between 1973 and 1995 and first developed the park in 1986. The only green space in this isolated Target Area, Trainsong Park has been an essential neighborhood amenity for nearly four decades. The ball field is used by neighborhood children for practice games and the playground features sand and water play for younger children. The skate park is listed on the Travel Lane County website, [Eugene Cascades and Coast](#), meaning that Trainsong Park—in this neighborhood blighted by industry and contamination and home to some of the poorest residents in the city or state—is worthy of advertising as a tourist attraction. Trainsong Park has been a hub for the [Oregon Department of Education's Summer Food Service Program](#) that provides meals to children under 18 during the summer. The program provides a recreational host, activities, and lunch. The City has also invested in the park and Target Area with its [Fun for All program](#), which has provided eight weeks of day-time free child care on weekdays in July and August, and free outdoor movie nights during the summer.

In **January 2022, Trainsong Park was closed and fenced off**, because [environmental sampling](#) found elevated levels of dioxin concentrations in park soils above from an unknown source (DEQ 2022). Dioxins are cancer-causing chemicals that come from waste burning, wood treating facilities, and manufacturing processes such as smelting, industrial uses present surrounding the Target Area. The sampling showed that the magnitude of

dioxins was greater on the east side of the park which surrounds the playground and the skate park. This pattern of contamination does not point to a source. Given the historical heavy industrial and transportation uses that surround Trainsong Park, the contamination could have originated from several different sources.

In April 2022, the City reopened portions of the park, such as paved areas and the playground (after the playground received 4+ inches of new bark or sand as a precautionary measure). February 2023 sampling was documented in DEQ’s [June 2023 site inspection report](#), which concluded that the park does not appear to be the source of the residential backyard contamination in the Target Area (DEQ 2023). However, **half of the park**—including areas surrounding the playground on three sides and immediately adjacent to the skate park—**remains fenced off and inaccessible to neighborhood users until the City secures funding for the proposed cleanup project. Without funding for the proposed cleanup, the park is operating at or below half capacity.**

Trainsong Park has been a safely accessible option for people in the Target Area to find opportunities for City and state assistance and recreation programs, neighborhood gatherings, sports events, outdoor recreation, and children’s play. As some of the neighborhood’s backyards have known contamination, Trainsong Park offers the only outdoor green space for those residents. The contamination in the closed areas the park presents health risks to children and the public. DEQ’s historical investigation sampled only eight of the approximately 106 residential yards within three blocks of Trainsong Park. Because of the confirmed dioxin contamination identified and the uncertainty regarding contamination at unsampled residential properties, Trainsong Park is an even more important resource for outdoor activities for families and children.

b. Revitalization of the Target Area, i. Reuse Strategy and Alignment with Revitalization Plans

The reuse strategy is to bring the Trainsong Park back to its full function and availability so that the community can use it and the City can proceed with plans to revitalize the park using other secured funding (see Table 1). The City’s [2023–2025 Adopted Biennial Budget](#) includes \$450,000 to modernize the stormwater system in the park to address occasional flooding (City of Eugene 2023), an improvement that is likely to be delayed until contaminated soils are addressed. The City’s 2018 [Vision and Implementation Plan](#) for parks includes a goal to secure funding to reinvest in maintenance at parks while providing critical infrastructure for clean air, clean water, and climate resilience (City of Eugene 2018). The plan includes a [\\$500,000 major renovation of Trainsong Park as a top priority](#). The City’s 2035 Transportation System Plan identifies Bethel Drive as a priority project and the [2022 voter-approved Street Bond](#) allocates \$2,672,700 to that project to repair and improve road paving, facilitating community access to the park and neighborhood in the Target Area (City of Eugene 2022).

ii. Outcomes and Benefits of Reuse Strategy

The City’s reuse strategy is to retrofit and improve the park, as described in Section 1.b.i, above. The reuse strategy aligns with and advances City land use and revitalization plans mentioned in Section 1.b.i. The benefits of the City’s plans are to keep this important public resource accessible to residents of the Target Area.

c. Strategy for Leveraging Resources

i.–iii. Resources Needed for Site Characterization/Remediation/Reuse (1.c.i through 1.c.iii)

Table 1. Potential Additional Resources for Renovation and Reuse

Name of Resource	Purpose	Resource Secured or Unsecured?	Additional Details or Information
City of Eugene	1.c.iii – Reuse	Secured	\$700,000 for park renovation and stormwater improvements from Park bond funds, Stormwater SDC funds, and American Rescue Plan Act of 2021 COVID recovery funding.
City of Eugene	1.c.iii- Reuse	Unsecured	\$550,000 for park renovation and stormwater improvements from Parks SDC funds and Stormwater Utility-Capital.
Business Oregon Special Public Works Fund	1.c.iii – Reuse	Unsecured	Loan financing of up to \$10 million with favorable interest rates could support improvements to trails, picnic areas, recreation equipment, or signage.
Business Oregon Brownfields Cleanup Fund	1.c.ii	Unsecured	Up to \$60,000 grant funding and potential low-interest loans for an unspecified amount that could support additional remedial efforts not previously identified and reimburse unplanned City general funds used to address remediation projects approved by Business Oregon.

Table 1. Potential Additional Resources for Renovation and Reuse

Name of Resource	Purpose	Resource Secured or Unsecured?	Additional Details or Information
Oregon State Parks Land and Water Conservation Fund	1.c.iii – Reuse	Unsecured	A grant of at least \$50,000 that could support improvement of the basketball court and ball field; modifications to bring facilities up to current design standards, such as for access by persons living with disabilities; improvement of parking or maintenance facilities; or nonroutine landscaping.
Oregon Parks and Recreation Department Local Government Grant Program	1.c.iii – Reuse	Unsecured	A grant of up to \$75,000 could support the improvement of recreation facilities; trails, pedestrian pathways, and walkways; and major rehabilitation (i.e., the repair, restoration, or reconstruction of) facilities required to meet the access requirements of the Americans with Disabilities Act, Section 504.

iv. Use of Existing Infrastructure

Existing infrastructure (including streets, sidewalks, walking paths, electrical, and stormwater systems) at Trainsong Park and surrounding areas will be used to support the planned work for the proposed cleanup at the park. Electrical and stormwater access can be provided by existing infrastructure for contractor use. A stormwater system upgrade is already planned (see Section 1.b.), but not believed to be necessary for the proposed cleanup at Trainsong Park. Roadways and other paved park access points will allow contractor access to move, stage, deliver, and process equipment and supplies. Walking paths within the park and nearby sidewalks can be used to facilitate pedestrian detours around portions of the park that will require closure during planned work. The only infrastructure upgrades that may be necessary for the remediation are trail and recreational facility upgrades, secured resources for which are listed in Section 1.a.b.i and Table 1.

2. Community Need and Community Engagement

a. Community Need, i. The Community's Need for Funding

The people living in the Target Area suffer from some of the greatest economic distress in the nation. Table 2 shows that the **median household income for people living in the Target Area is nearly at half that of the state and national median income**—on average, residents in the Target Area subsist on less than \$2,000 a month. People living in the Target Area are almost twice as likely as those in the nation to be unemployed.

Table 2. Economic Distress Data

Indicator	Target Area	City of Eugene	Oregon	U.S.
2021 Population	3,223	174,330	4,207,177	329,725,481
Population Change Since 2010	-429	+18,145	+376,103	+20,979,943
2021 Median Household Income	\$38,736	\$55,776	\$70,084	\$69,021
2021 Annual per Capita Income	\$22,914	\$35,974	\$37,816	\$37,638
2021 % Below Poverty Level ^a	25%	19%	12.1%	12.6%
2021 Unemployment Rate ^a	9%	7%	5.6%	5.5%

Note Shading indicates disparities between the Target Area and other areas.

Source: [U.S. Census Bureau 2020 American Community Survey 5-year estimates \(2016–2020\)](#).

For almost all indicators, the [Climate and Economic Justice Screening Tool \(CEJST\)](#) shows that this community is **above the 90th percentile** in the state (9 out of 11) and in the nation (8 out of 11) **for disadvantages** such as educational attainment; rates of asthma; low life expectancy; high housing burden costs; risks of exposure to particulate matter, diesel particulate matter, toxic air releases, hazardous waste, under-ground storage tanks, wastewater; and—**notably—lack of green space** (Table 3).

These socioeconomic and health factors demonstrate that the **community in the Target Area is highly overburdened**. The proposed project to remove contamination from, and restore access to, the only grass-covered public area in a blighted area is a sorely needed step to help nearby families thrive. A [2022 paper published in the North Carolina Medical Journal](#) states that access to parks can "represent a cost-effective alternative and/or supplement to more conventional health promotion strategies" and is associated with lower levels of health-care spending, enhanced cardiovascular and mental health, and reduced obesity levels (Larson and Hipp 2022). Similar studies in [2014 in Preventive Medicine](#), [2016 in the American Journal of Preventive Medicine](#), and a [2021 National](#)

[Institute of Health study](#) of children point to documented physical and mental health benefits for populations that had access to parks or green spaces (Stark et al. 2014, Cohen et al. 2016, and Garcia et al. 2022). **With lower-than-average life expectancies and high rates of poverty and depression, the people of this Target Area need federal assistance to implement this project and restore full use of this neighborhood amenity to support community health.**

Table 3. CEJST Disadvantaged Community Indicators for the Target Area	Target Area Percentile in State	Target Area Percentile in U.S.
Low income (at least 200% below federal poverty level)	92	87
People diagnosed with asthma	95	95
Lower-than-average life expectancy	97	97
Housing cost burdened (spending more than 30% of income on housing while making less than 90% of area median family income)	91	91
Homes lacking indoor kitchens or plumbing	98	98
Lack of green space (lands covered in impermeable surfaces such as roads or concrete)	95	95
Proximity to facilities with risk management plans for hazardous materials or waste	91	91
Exposure to diesel particulate matter	96	96
Proximity to underground storage tanks and/or releases from USTs	96	96
Unemployment	79	79
Percentage of people 25+ years who do not have a high school diploma	82	72

Notes

Shading means Target Area percentile is above 80%. UST = underground storage tank.

Source: Council on Environmental Quality [Climate and Economic Justice Screening Tool](#).

ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations and (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

As shown in Table 3, Target Area residents are a sensitive population living at or below 200% of the federal poverty levels. People living in the Target Area experience multiple environmental risk factors (discussed in Sections 1.a i and ii, and shown in Tables 3 and 5) that are evident in the **lower-than-average life expectancy—one of the lowest in the nation.**

Table 4. Sensitive Population Health Risk Factors in the Target Area	Health Measure in Adults ≥ 18	Target Area	U.S.
Asthma	13.1%	7.7%	
High blood pressure	28.6%	48.1%	
Cancer	4.3%	9.6%	
Heart disease	5.3%	5.5%	
Chronic obstructive pulmonary disease	8.1%	6.4%	
Diabetes	10%	11.3%	
Obesity	40.2%	35%	
Stroke	2.8%	3.1%	
Depression	31.6%	18.5%	

Sources: Sensitive population data are from U.S. Environmental Protection Agency [Environmental Justice Screening and Mapping Tool](#) Community Report for Tract 41039004200. Health measure data are from Centers for Disease Control and Prevention PLACES 2021 data set for [CT 42 \(the Target Area\)](#), model-based estimates generated using Behavioral Risk Factor Surveillance System 2021 or 2020, Census 2010 population counts or census county population estimates of 2021 or 2020, and American Community Survey (ACS) 2015-2019 or ACS 2016-2020, ACS 2017-2021. U.S. data are from the CDC [National Center for Health Statistics](#).

above the state's 90th percentile, and half are above the 80th percentile for the U.S.

The [Centers for Disease Control \(CDC\)](#) has found that low levels of exposure to dioxins may cause cancer, liver damage, changes in blood sugar, and hormone levels in humans (CDC 2017). Health data from the CDC show that the **incidence of asthma, chronic obstructive pulmonary disease, obesity, and depression** among residents of the Target Area are **higher than the national averages** (Table 4).

(3) Environmental Justice, a. Identification of Environmental Justice Issues

EPA's Environmental Justice Screening and Mapping Tool (EJScreen) data (Table 5) show that **Target Area residents have a 7% greater risk of obesity** and nearly **twice the rates of depression** of their counterparts across the U.S. (Table 4). Target Area EJScreen values are at or above the 80th percentile for the state for all but one of the EJ indexes. Nine values are

EJScreen supplemental index values (averages of the percentages of low-income, unemployed, limited English proficiency, educational attainment, and life expectancy) follow the same pattern, with all values except two (ozone and Superfund proximity) at the 84th percentile and above in the state and the nation, demonstrating that the community in the **Target Area is one of the most disadvantaged in the state and country.**

Target Area low life expectancy statistics corroborate the [U.S. Department of Health and Human Services](#) (USDHS) findings that housing costs and instability may lead to increased health risks, including overall mortality (USDHS 2023). According to the [CDC](#), the **average life expectancy for people living in the Target Area (age 70.2) is almost 10 years less than life expectancy for all Oregonians (age 79.6).** The proposed project will reduce the dioxin exposure risk to people in the Target Area.

Table 5. Identifying Sensitive Populations in the Target Area—EJ Screen Data	Percentile in	
	State	U.S.
Particulate Matter	94	81
Diesel Particulate Matter	97	86
Air Toxics Cancer Risk	82	78
Air Toxics Respiratory HI	94	89
Toxic Releases to Air	89	79
Traffic Proximity	90	79
Lead Paint	92	78
Superfund Proximity	41	37
RMP Facility Proximity	92	81
Hazardous Waste Proximity	95	81
Underground Storage Tanks	94	85
Wastewater Discharge	94	76

Notes
 HI = hazard index.
 RMP Facility = a facility that has submitted a risk management plan to the U.S. Environmental Protection Agency.
 Shading indicates that the Target Area ranks in the 80th percentile or above for index values and above the U.S. percentage for indicators.
 Source: [Environmental Justice Screening and Mapping Tool](#).

This grant will help the City restore opportunities for community members to enjoy green space, for families to gather, and for children to play at one of the City’s only public recreation facilities that can be easily and safely accessed. **Restoring these recreation opportunities can positively impact the overall health and well-being of people living in one of the lowest-income communities in the nation.**

b. Advancing Environmental Justice

The goal of the proposed project for this disadvantaged community is to remove the contamination from a public green space in a neighborhood bounded by rail and major road ROWs as well as industry. The cleanup and revegetation of the park will improve the quality of life for those in the Target Area by restoring full access to Trainsong Park, facilitating participation in sports, other outdoor activities, and City events and programs that benefit Trainsong neighbors and their children.

b. Community Engagement, i.–ii. Project Involvement and Project Roles (2.b.i through ii)

Table 6. Project Involvement and Project Roles	Organization/Entity/ Group Name	Point of Contact	Specific Project Role or Assistance Provided
	Active Bethel Community	Lin Woodrich abclinwoodrich@gmail.com	Provide liaisons with the community, advertise community meetings, share project updates around site reuse on its website and in its newsletter. Advise the City on community engagement and messaging.
	Beyond Toxics	Lisa Arkin, Executive Director larkin@beyondtoxics.com	Provide liaisons with the community, advertise community meetings, share project updates around site reuse on its website and in social media. Advise the City on best practices for toxic reductions, community engagement and messaging. Provide technical review of cleanup plans.
	State of Oregon Department of Environmental Quality	Anthony B. Chavez, RG, DEQ Project Manager Anthony.CHAVEZ@deq.oregon.gov	Advise City and project partners on regulatory and environmental impacts, share communications with the community about contamination in the Park.

iii. Incorporating Community Input

When the City closed the park in January 2022, it posted a fact sheet about the park closure on its [website](#) and later updated the fact sheet and its website when it reopened portions of the park in April 2022. It also partnered with DEQ to host two [events at the park in June 2023](#) to gather feedback and provide more information about the testing results and closure. DEQ, the City, and OHA posted an updated list of FAQs on the [City’s website](#) in October 2023. The FAQs provide information on the closure, the contaminant, the sampling, and next steps.

Since then, the City has prepared an analysis of brownfield cleanup alternatives (ABCA) that weighs the alternatives for cleanup and received feedback from the public on the ABCA at a neighborhood meeting on October 23. Discussion at the meeting included concerns about other contamination that has been documented in

the area as well as human health risks from exposure to pollutants. The presenters responded to questions about the cleanup threshold for dioxins and extent of the dioxin sampling and duration of dioxin presence in soils, potentially responsible parties, the cleanup methodology, time frame, EPA role in the cleanup, City bond funding related to restoration of the park, and a request to plant more trees in the park as part of the restoration. Participants expressed written and verbal appreciation that the City was pursuing grant funding. The [City's website for the project](#) links to a video of the presentation and all of the project materials. The City also provided materials translated into Spanish and prepared a [Spanish-language project website](#).

The project budget includes funding for culturally appropriate forms of community engagement as the project is developed. The City will develop a public involvement plan upon award notification, building on the City's past community outreach and engagement efforts. The City anticipates holding at least 4 community meetings, promoted by project partners on their social media and web venues, published in the city newspaper, and in neighborhood association newsletters. The City will publish 6 press releases or articles describing the cleanup status. The City will foster robust and meaningful community engagement by partnering with Active Bethel Community to offer up to 50 stipends of \$100 over the project life to stimulate meeting participation. The City will transparently and publicly report in writing (posted online) and share the feedback it incorporated and how, and the feedback it did or could not incorporate and why in subsequent public meetings.

3. Task Descriptions, Cost Estimates, and Measuring Progress

a. Proposed Cleanup Plan

The preferred remedial action includes the following:

- Excavation of contaminated soil in areas where dioxin concentrations exceed risk-based concentrations protective of park users.
- Off-site disposal of excavated soil as nonhazardous waste at a permitted landfill.
- Import and placement of clean fill material to return excavated areas to the existing grade, along with grass seeding and vegetation to restore park conditions.

This cleanup plan is more effective than the other alternatives in the ABCA, including capping and excavation with selective soil blending. Excavation, off-site disposal, and backfilling is a permanent, long-term reliable solution that physically removes dioxin-impacted soils from Trainsong Park. The cleanup is the most protective long-term solution for park users.

b. Description of Task, Activities, and Outputs

i-iv. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, Outputs (3.b.i - 3.b.iv)

Table 7. Tasks and Activities

Task 1 – Project Management

- i. **Implementation:** The City and the qualified environmental professional (QEP) will be responsible for overall project management and execution, with oversight and input from EPA and DEQ. The City will manage project tasks, monitor schedule and budget, report on project activities to stakeholders, and procure and oversee the QEP, which will support reporting and developing a final closeout report documenting all project activities. The City and QEP will meet with DEQ quarterly.
- ii. **Anticipated Project Schedule:** QEP procurement will take place after the notice of grant award; grant funding is expected to become available by fall 2024; remaining work will take place October 1, 2024, to September 30, 2028.
- iii. **Task/Activity Lead:** City and QEP project managers.
- iv. **Outputs:** 24 project team meetings with meeting minutes, 8 quarterly meetings with DEQ, 8 quarterly reports, 3 contract compliance reports, 3 federal financial reports (FFRs), 1 final summary report.

Task 2 – Community Engagement and Outreach

- i. **Implementation:** The City will collaborate closely with area residents, project partners, and other stakeholders throughout the cleanup planning and remedial action; develop a public involvement plan and conduct 4 community outreach meetings at key project milestones; maintain and update the project websites and online information repository; and communicate project information through newspaper, newsletter, social media, email, and website notifications. The QEP will support the City with facilitating community meetings, drafting articles and press releases, and assisting with outreach to neighbors in the community, including finding interpretation and translation for meetings and administering stipends through partnership with the community based organizations.

Table 7. Tasks and Activities

- ii. **Anticipated Project Schedule:** October 1, 2024, to September 30, 2028, with key public meetings in October 2024, January 2025, April 2025 (during cleanup), October 2025 (post cleanup), and other meetings as needed.
- iii. **Task/Activity Lead:** City and QEP project managers; assist: project partners.
- iv. **Outputs:** 1 public involvement plan (PIP), 4 community meetings and notes/attendance/recordings, website and online information archive, 6 press releases or newspaper/web articles. Other outreach as needed.

Task 3 – Remedial Design and Cleanup Planning

- i. **Implementation:** Activities will include finalizing the ABCA including review and approval by Oregon DEQ; holding the ABCA 30-day public review and comment period; preparing a work plan for additional incremental sampling methodology/composite sampling to address data gaps for remedial design; performing a cultural resources review and assessment for the project area; preparing a wetlands delineation, obtaining permits, and undergoing wetlands compensatory mitigation (if present); negotiating and receiving regulatory approvals; completing 50%, 90%, and 100% design documents; preparing bid documents for cleanup contractors; and bidding process support, including contractor selection.
- ii. **Anticipated Project Schedule:** October 1, 2024, to March 31, 2025.
- iii. **Task/Activity Lead:** City; assist: QEP, EPA, and DEQ project managers.
- iv. **Outputs:** 1 ABCA; 1 data gaps investigation work plan; 1 health and safety plan, 1 quality assurance project plan; 50%, 90%, and 100% design documents; 1 set bid documents.

Task 4 – Remedial Action Implementation

- i. **Implementation:** The City will use the majority of the grant funding for site cleanup implementation. With support from the QEP, the City will procure a remediation contractor in compliance with state regulations and 2 Code of Federal Regulations 200.317.326, which the City project manager will oversee with QEP assistance. Contractor cleanup activities are estimated to include excavation and off-site disposal of approximately 2,500 cubic yards of dioxin-impacted soil; with backfilling, grass seeding, and vegetation planting to restore park conditions. The City will work with DEQ to ensure the cleanup meets state regulations.
- ii. **Anticipated Project Schedule:** April 1, 2025, to June 30, 2025.
- iii. **Task/Activity Lead:** City; assist: construction contractor, QEP, and DEQ and EPA project managers.
- iv. **Outputs:** 1 final cleanup summary report.

Task 5 – Monitoring and Improvements

- i. **Implementation:** The City will perform monitoring at 6 and 12 months post completion to ensure park restoration is achieved for future intended use. The City will provide required project documentation and final closeout information to granting agency.
- ii. **Anticipated Project Schedule:** July 1, 2025, to September 30, 2028.
- iii. **Task/Activity Lead:** City; assist: QEP.
- iv. **Outputs:** 6- and 12-month monitoring reports.

c. Cost Estimates

The City of Eugene will lead each task, directing consultants to assist as needed. Personnel and Fringe Benefits costs in this section are based on City personnel costs of \$160/hour (60% personnel, 40% fringe).

Table 8. Project Budget	Project Tasks					Total
	1. Project Management	2. Community Engagement and Outreach	3. Remedial Design and Cleanup Planning	4. Remedial Action Implementation	5. Monitoring and Improvements	
Direct Costs						
Personnel	\$19,200	\$5,760	\$3,840	\$9,600	\$960	\$39,360
Fringe Benefits	\$12,800	\$3,840	\$2,560	\$6,400	\$640	\$26,240
Travel	—	—	—	—	—	—
Equipment	—	—	\$2,000	—	—	\$2,000

Table 8. Project Budget	Project Tasks					Total
	1. Project Management	2. Community Engagement and Outreach	3. Remedial Design and Cleanup Planning	4. Remedial Action Implementation	5. Monitoring and Improvements	
Direct Costs						
Supplies	—	\$2,000	—	—	—	\$2,000
Contractual	\$15,050	\$37,100	\$262,360	—	\$7,000	\$321,510
Construction	—	—	—	\$1,115,887	—	\$1,115,887
Other	—	\$6,350	\$8,100	\$5,400	—	\$19,850
Total Direct Costs	\$47,050	\$55,050	\$278,860	\$1,137,287	\$8,600	\$1,526,847
Total Indirect Costs	—	—	—	—	—	—
Total Budget	\$47,050	\$55,050	\$278,860	\$1,137,287	\$8,600	\$1,526,847

Note — = no costs in category.

Table 9. Development of Cost Estimates	
Task	Cost Basis and Assumptions
1. Project Management	<p><u>Personnel and Fringe Benefits: \$32,000</u></p> <ul style="list-style-type: none"> For City personnel/fringe (200 hrs x \$160 = \$32,000); (this includes activities considered administrative costs and programmatic costs; the administrative costs will not exceed 5% of the total budget) <p><u>Contractual Costs: \$15,050</u></p> <ul style="list-style-type: none"> 24 project team meetings (24 x \$175/hour [hr] x 1 hr = \$4,200) 8 quarterly meetings with DEQ (8 x \$175/hr x 1 hr = \$1,400) 8 quarterly reports (8 x \$175/hr x 4 hrs = \$5,600) 3 contract compliance and FFR reports (3 x \$175/hr x 2 hrs = \$1,050) 1 final summary report (16 hrs x \$175/hr = \$2,800)
2. Community Engagement and Outreach	<p><u>Personnel and Fringe Benefits: \$9,600</u></p> <ul style="list-style-type: none"> For City personnel/fringe (60 hrs x \$160 = \$9,600); (this includes activities considered programmatic costs such as direct outreach to neighbors and material preparation) <p><u>Supplies: \$2,000</u></p> <ul style="list-style-type: none"> Production of print and online materials for community outreach, meeting supplies and materials for community outreach meetings (\$2,000) <p><u>Contractual Costs: \$37,100</u></p> <ul style="list-style-type: none"> Public involvement plan (20 hrs x \$175/hr = \$3,500) Community outreach meetings (4 x 10 hrs x \$175/hr = \$7,000) Articles/media updates (6 x 2 hrs x \$175/hr = \$2,100) Direct outreach and engagement with impacted, underserved communities (100 hrs x \$175/hr = \$17,500) Website updates (20 hrs x \$175/hr = \$3,500) Interpretation and translation (20 hrs x \$175/hr = \$3,500) <p><u>Other: \$6,350</u></p> <ul style="list-style-type: none"> Stipends through partnership with Active Bethel Community for community meeting participation (50 stipends x \$100 = \$5,000) Regulatory oversight costs – Oregon DEQ for public meeting attendance and review of outreach materials (5 hrs x \$270/hr = \$1,350)
3. Remedial Design and Cleanup Planning	<p><u>Personnel and Fringe Benefits: \$6,400</u></p> <ul style="list-style-type: none"> For City personnel/fringe (40 hrs x \$160 = \$6,400) (this includes activities considered to be programmatic costs, such as ABCA and work plan review) <p><u>Equipment: \$2,000</u></p>

Table 9. Development of Cost Estimates	
Task	Cost Basis and Assumptions
	<ul style="list-style-type: none"> • Reusable and disposal equipment for additional soil sample collection to address data gaps (\$2,000) <p><u>Contractual Costs: \$262,360</u></p> <ul style="list-style-type: none"> • Finalize ABCA, including regulatory and public review comments (20 hrs x \$175/hr = \$3,500) • Work plan development (50 hrs x \$175/hr = \$8,750) • Cultural resources review and assessment (40 hrs x \$175/hr = \$7,000) • Wetlands delineation, permitting, and mitigation (\$175,000) • HASP/QAPP development (70 hrs x \$175/hr = \$12,250) • Additional sampling (48 hrs x \$175/hr = \$8,400) and laboratory analysis (6 samples x \$910/sample = \$5,460) • 50% design documents (60 hrs x \$175/hr = \$10,500) • 90% (75 hrs x \$175/hr = \$13,125) • 100% design documents (30 hrs x \$175/hr = \$5,250) • Bid documents for cleanup, communicate with contractors, evaluate bids, call references, coordinate pre-bid onsite meeting, and select contractors (75 hrs x \$175/hr = \$13,125) <p><u>Other: \$8,100</u></p> <ul style="list-style-type: none"> • Regulatory oversight costs – Oregon DEQ for design reports review and project oversight during design phase (30 hrs x \$270/hr = \$8,100)
4. Remedial Action Implementation	<p><u>Personnel and Fringe Benefits: \$16,000</u></p> <ul style="list-style-type: none"> • For City personnel/fringe (100 hrs x \$160 = \$16,000); (this includes activities considered programmatic costs such as project inspection) <p><u>Contractual Costs: \$1,115,887</u></p> <ul style="list-style-type: none"> • Preliminary site work (\$93,500): mobilization (10% of direct construction costs = \$73,000), erosion and sediment controls (\$5,000), utility locate (\$500), construction-phase surveying (\$15,000) • Soil excavation and backfill placement (\$85/cy x 2,485 cy = \$211,199) • Soil transportation and disposal (\$100/ton x 3,727 = \$372,704) • Site restoration: hydroseed (\$3/square yards [sy] x 5,591 sy = \$16,772) and landscape plantings (\$36/sy x 1,864 sy = \$67,087) • Compliance sampling (\$35,800) • Permitting, construction administration, and contingency: \$318,825 <p><u>Other: \$5,400</u></p> <ul style="list-style-type: none"> • Regulatory oversight costs – Oregon DEQ for regulatory project oversight during implementation and final report review (20 hrs x \$270/hr = \$5,400)
5. Monitoring and Improvements	<p><u>Personnel and Fringe Benefits: \$1,600</u></p> <ul style="list-style-type: none"> • For City personnel/fringe (10 hrs x \$160/hr = \$1,600); (this includes activities considered programmatic costs) <p><u>Contractual Costs: \$7,000</u></p> <ul style="list-style-type: none"> • 6- and 12-month monitoring reports (20 hrs x \$175/hr x 2 = \$7,000)

Notes	FFR = federal financial report.	QAPP = quality assurance project plan.
ABCA = analysis of brownfield cleanup alternatives.	hr = hour.	QEP = qualified environmental professional.
cy = cubic yard.	HASP = health and safety plan.	sy = square yard.

d. Plan to Measure and Evaluate Environmental Progress and Results

The City and QEP will prepare a project work plan with a detailed schedule of milestones such as completion of the sampling and analysis plan and quality assurance project plan, public meetings, and remedial action implementation. The City will track and evaluate monthly progress in coordination with the QEP and construction contractor and publish results in quarterly progress reports, which the City will review and make publicly available on the project website. Measurement will compare output and outcome goals to quarterly achievements so that deviations can be identified and corrected in a timely manner. Measurable cleanup results that the City and QEP

will record include reduction of dioxin concentrations below risk-based thresholds for park users through performance and confirmation sampling during remedy construction. Upon successful completion of cleanup, additional investments (City resources secured) will be made to improve the recreational amenities in the park and address local flooding issues. While these investments are outside of this grant request, these improvements cannot take place until cleanup occurs.

4. Programmatic Capability and Past Performance

a. Programmatic Capability, i. Organizational Structure, ii. Description of Key Staff

The City of Eugene Public Works Parks and Open Space Division is the branch of City government that will oversee the administration of this grant. Public Works also includes the Engineering Division, which regularly partners with Parks and Open Space on engineering, infrastructure planning, and technical expertise. The work of Parks and Open Space is guided by its [30-year system plan](#), last updated in 2018 (City of Eugene 2018). The City also passed a Bond and Operational Levy in 2018 that funds work such as developing and reinvesting in parks, with a focus on investments in underserved areas. **The cleanup grant will be managed by Emily Proudfoot, Principal Landscape Architect with the City's Parks and Open Space Planning Office within Public Works.** Emily, an experienced project manager and grant administrator with **25 years of experience**, is familiar with the processes needed to successfully implement the project; expend the grant funds; and meet all technical, administrative, financial, and reporting requirements in a timely manner. Emily will provide project and technical review and oversight and will manage day-to-day grant activities, plan and implement cleanup activities, contract with and manage the QEP work, lead community engagement, contract for remediation services, and oversee reporting to EPA and DEQ. Emily will be assisted by **Carolyn Burke, Parks and Natural Resource Planning Manager with the City's Parks and Open Space Division of Public Works.** Carolyn has **25 years of experience in project management and community outreach.** **Becky Wheeler, Budget Manager** in the City's Parks and Open Space Division of Public Works, has **3 years of budget management experience and 10 years of contract/procurement management experience.** Becky will administer and disburse funds, manage accounting and reimbursement requests to EPA. **Kate Wilson, Planner with the Lane Council of Governments has several years of experience with federal grant administration** and will assist the project manager.

iii. Acquiring Additional Resources

The City of Eugene has a consistent practice of cultivating local construction talent and hiring locally when there is an opportunity. In redevelopment and brownfield work on the Downtown Riverfront, the City hired a local general contractor to do extensive work in its former Utility Company operations yard. The City is redeveloping this 17-acre site into a new neighborhood, and several local and southern Willamette Valley construction contractors have been employed for the past 5 years to redevelop these properties into public amenities. All projects are advertised through the State of Oregon's Certification Office for Business Inclusion and Diversity program, which has been crucial for hiring local and diverse companies.

b. Past Performance and Accomplishments

i/ii. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments, (2) Compliance with Grant Requirements

The City has received two recent Brownfield grants, one in 2012 (for \$680,200) and one in 2017 (for \$500,000). The 2012 grant funded 14 Phase I ESAs, 8 Phase II ESAs, and cleanups at 4 properties. The 2017 grant funded 21 Phase I ESAs, 13 Phase II ESAs, and cleanups at 2 properties. Together, the two grants funded site investigations at a total of 36 properties. The 2012 grant closed in September 2017 with closeout submitted in December 2017; the 2017 grant was closed in September 2020 with closeout submitted in December 2020. The grants were successfully administered by Amanda D'Souza and Anne Fifield in the Community Development Division of the City of Eugene's Planning and Development Department. The staff that managed those grants are available resources that will be utilized by Public Works Parks and Open Spaces Division staff for this grant, if needed.

In 2022, the City of Eugene Department of Public Works Parks and Open Spaces division received a U.S. Economic Development Assistance (EDA) grant for \$ 1,214,479.00 (#EDA-2021-ARPATOURISM) for the FY 2021 American Rescue Plan Act Travel, Tourism, and Outdoor Recreation program to expand the City's multi-use trails and mountain biking trails. To date, the City has engaged an advisory group of diverse and active local mountain bikers on design goals and layouts, established a concept design and conducted a cultural resource assessment and wetland delineations, and applied for a special use permit. Construction is expected to begin in the fall of 2024 upon design completion and bidding for specialty contractors. The project is managed by City of Eugene Contract Planner Kate Wilson, who oversees on-time Assessment, Cleanup and Redevelopment Exchange System reporting and semiannual reporting. While still in the early stages of this project, the City has met all project and reporting milestones and expended funds accordingly and is on track to complete the grant project on schedule, following all EDA rules and regulations.

City of Eugene Trainsong Park EPA Brownfields Cleanup Site

III.B. Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

a. Indicate applicant type and provide information that demonstrates how you are an eligible entity for a cleanup grant.

The City of Eugene, Oregon (the City), as a General Purpose Unit of Local Government (per 2 Code of Federal Regulations § 200.1) is eligible to apply for a cleanup grant.

b. As a government agency the City of Eugene, Oregon is exempt from federal taxation under Internal Revenue Code and the organization does engage in lobbying at both the State and Federal levels.

2. Previously Awarded Cleanup Grants

The City affirms that the proposed Site has not received funding from a previously awarded EPA Brownfields Cleanup grant.

3. Expenditure of Existing Multipurpose Grant Funds

The City of Eugene is not currently party to a Multipurpose cooperative agreement.

4. Site Ownership

The City affirms that it owns Trainsong Park, the Site of the proposed cleanup project, and has owned the Site since at least 1983. The City also affirms that, if awarded Brownfields Cleanup grant funds, it will retain ownership of the Site for the duration of time during which Brownfields Cleanup grant funds are disbursed for the cleanup of the Site.

5. Basic Site Information

a) Site Name: Trainsong Park

b) Site Address: 2775 Edison Street, Eugene, Oregon 97402, Tax Lots: 17042612400, 170426123100, 170426123200, 170426123300, 170426123301, 17042621100, and 170426215400.

6. Status and History of Contamination at the Site

a) Whether this site is contaminated by hazardous substances or petroleum

Environmental sampling conducted in 2021, 2022, and 2023 had detections of polychlorinated dibenzo-p-dioxins and dibenzofurans (dioxins) in soils at Trainsong Park that exceeded the Oregon Department of Environmental Quality (DEQ) residential risk-based concentration (RBC) of 4.7 parts per trillion (ppt) and the DEQ-approved park user, site-specific RBC of 20 ppt. Based upon these investigations large portions of the park remain closed for public use to date.

b) The operational history and current use(s) of the site:

The City developed Trainsong Park in 1986. The approximately 5-acre municipal park currently includes a skate park, playground, ball field, basketball courts, a picnic bench, and walking

paths. Prior DEQ investigation of the Site indicated that, by 1936, the Site and surrounding area was agricultural until the mid-1940s when residential use in the area began. The Site area was cleared with no identified uses by the mid-1970s until park development in the mid-1980s.

c) Environmental concerns, if known, at the site

Environmental sampling was conducted in a number of City of Eugene parks in 2021 to establish background concentrations of dioxins in the region. During that sampling, elevated dioxins at the Site were identified. DEQ investigated the elevated concentrations and published a Site Investigation report in June 2023. The investigation identified dioxin contamination in surface soils at the Site and on some residential properties within the neighborhood; however, it concluded that contamination sources were not identified and that the Site did not appear to be the source of the contamination. Surface soil contamination at the Site ranged from 1.0 to 360 parts per trillion (ppt). Many of these concentrations exceed the previously stated residential RBC and site-specific park user RBC (Section 6.a.)

d) How the site became contaminated, and to the extent possible, describe the nature and extent of the contamination

DEQ investigations identified contamination in the surface soils at the Site. These investigations concluded that Trainsong Park did not appear to be a source of the contamination. Incremental sampling methodology was utilized and decision units within the park that exceed applicable screening levels were identified. Decision units exceeding RBCs are primarily in the eastern portion of the Site and surround the playground structures. DEQ also sampled for other analytes such as heavy metals, polycyclic aromatic hydrocarbons, and pentachlorophenol. These other analytes were assessed to identify whether known nearby (off-site) historical uses could be linked to site contamination; however, almost all of the other analytes were non-detect, below background concentration, or were below residential screening levels. DEQ concluded “testing for potential orchard-related pesticide chemicals in shallow soil at Trainsong Park did not identify any indicator compounds, like arsenic or lead. Also, sampling for pentachlorophenol, to assess if dioxin soil contamination could have been a result of nearby wood treating, did not detect pentachlorophenol” (DEQ 2023). No sources were identified by DEQ.

7. Brownfield Site Definition

The City affirms that the Site is not listed or proposed for listing on the National Priorities List, not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA, and not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

The Site is currently enrolled in DEQ’s Voluntary Cleanup Program (Environmental Cleanup Site Information [ECSI] [Site ID: 6504](#)).

The environmental site assessment equivalent materials have been completed:

Trainsong Park Site Inspection (SI) Report - 2775 Edison Street Eugene, Lane County, Oregon, prepared by Oregon Department of Environmental Quality, dated June 26, 2023. For more information, please visit the following website link: [Trainsong Park SI](#).

9. Site Characterization

The City affirms that the Site has been sufficiently characterized from the environmental site assessment performed to date for the remediation work to begin on the Site. DEQ performed the prior environmental site assessment (see Question 8) and has provided a letter dated November 8, 2023, and attached to this grant application packet, that indicates that DEQ believes the Site is characterized sufficiently to begin remediation of the Site, Trainsong Park.

10. Enforcement or Other Actions

The City affirms there are no known ongoing or anticipated enforcement actions related to this Site. DEQ performed the prior site investigations in 2022 and the first half of 2023. DEQ and the City entered the Site into the Voluntary Cleanup Program on September 28, 2023, upon completion of the DEQ's investigation activities.

11. Sites Requiring a Property-Specific Determination

The City affirms the Site does not require property-specific determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a) Property Ownership Eligibility – Hazardous Substance Sites

ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

Per CERCLA § 104(k)(3)(E), if an applicant that is a public entity (such as a state or local government) acquired property prior to January 11, 2002, the applicant is eligible for a Brownfields Grant and may use grant funds to address contamination at the property, even if the entity does not qualify as a bona fide prospective purchaser, provided the applicant did not cause or contribute to the release or threatened release of a hazardous substance at the property. The City affirms the following to be true:

- (a) The Site was acquired and assembled over the course of several decades for the purposes of a public park. The City recognized that residents of the Trainsong neighborhood had limited access to area parks given the barriers surrounding the neighborhood that limited safe pedestrian access outside the neighborhood. A right of way bisected the park site from north to south and was vacated in 1986. The first improvements to the park were installed later in 1986 and consisted of walks, a playground, irrigation, and lawn area. These improvements were funded by a Community Development Block Grant (CDBG). The park was renovated in 2003 and additional recreational amenities were added that still exist today.
- (b) The Site was acquired by the City of Eugene in three separate transactions:

- a. Tax lots 100, 400, 3100, and 3200 were acquired in 1973 through a foreclosure proceeding.
 - b. Tax lot 5400 was acquired in 1980.
 - c. Tax lots 3300 and 3301 were acquired in 1995 from Lane County through a quitclaim deed.
- (c) The City is not aware of any disposal of hazardous substances on the Site prior to or during ownership.
- (d) The City affirms that it has not caused or contributed to any release of hazardous substances at the Site.
- (e) The City affirms that it has not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

13. Cleanup Authority and Oversight Structure

a) The Site is currently enrolled in DEQ’s Voluntary Cleanup Program (ECSI Site ID: 6504). The City will procure a qualified environmental professional and construction contractor to design and perform the cleanup under DEQ regulatory oversight. DEQ’s oversight of the cleanup project will ensure the cleanup is protective of human health and the environment.

b) DEQ investigation of the area indicated that the Site is not the source of environmental contamination. The review of cleanup alternatives completed does not indicate that the cleanup will impact neighboring properties. The Site has direct access to a public street and neighboring properties are not believed to be impacted by the Site.

14. Community Notification

The City provided the community an opportunity to comment on the proposed grant application and draft ABCA at a public meeting held on October 26, 2023. The meeting notice was published on October 15, 2023, through a Community Notification ad in the local newspaper (*The Register Guard*), posted on the City of Eugene’s public meeting list on its website, and notifications were sent as postcard mailers to residents in the Trainsong neighborhood.

Notifications listed the public meeting time and location and included the City’s Trainsong Project website (provided in English and Spanish) where the draft grant application and ABCA were provided digitally. Each document was printed and presented for public review at the public meeting. During the public meeting, the City and its environmental consultant presented the findings of the ABCA and discussed the application as well as answered questions from the public.

a. Draft Analysis of Brownfield Cleanup Alternatives

The City prepared an analysis of brownfield cleanup alternatives (ABCA) that discussed the Site and contamination issues, cleanup standards, applicable laws, the cleanup alternatives considered, weighed the alternatives for cleanup, and described the proposed cleanup.

b. Community Notification Ad

The City notified neighbors about an October 26, 2023, public meeting about the ABCA

and grant application using a postcard mailer, newspaper ad, notices on the City website, and direct communications with stakeholders. The ad and notices provided website links where digital copies of the grant application and the draft ABCA were available for public review and comment. Information included how the public can comment on the draft application; where the draft application is located; and the date, time, and location of the public meeting. A translated website was also prepared for Spanish speakers. Comments were accepted through the website and at the public meeting.

c. Public Meeting

The City sought feedback from the public on the ABCA and grant application at an October 26, 2023, meeting at a church one block from the park Site. The 2-hour open house included display boards and two short presentations about the ABCA findings and grant application followed by an opportunity for attendees to ask questions and provide comment forms for feedback. Several City project staff and three consultant staff attended and answered questions. A recording of the presentation was available in English with Spanish closed captions and meeting materials translated into Spanish were available online.

Six members of the public attended the meeting. Questions taken during the meeting largely focused on specific aspects of the screening levels used to assess the Site, extent of the dioxin sampling and duration of dioxin presence in soils, potentially responsible parties, the cleanup methodology, time frame, EPA role in the cleanup, and City bond funding related to restoration of the park. Verbal comments also included general approval of the selected cleanup alternative (excavation of the impacted soils), apprehension about the safe off-site disposal of the impacted soils, questions regarding the safety of other non-City owned sites, and general support for applying for federal funding for the project.

As of the date of this grant application, seven comments were received during the public meeting and/or through the City website.

- One comment wanted the work to be performed as quickly as possible, requested more in-park signage to explain why the park is currently closed, and wanted to point out that fruit trees are present in the park and should be addressed.
- Five comments were supportive of either the grant application or the preferred remedy from the ABCA.
- One comment worried about their grandchildren's exposure from the park, how the contamination would impact housing sales, and that they considered the park a positive feature when moving to the neighborhood.

Each of the comments have been included or summarized in the attachments later in the application packet. Based upon comments, the City plans to install additional signage in the park, improve fencing around the closed portions of the park, address fruit trees in the park, and will take public sentiment about expediting cleanup into account during future scheduling decisions.

d. Submission of Community Notification Documents

The following documents are included in this application package:

- A copy of the draft ABCA
- A copy of the newspaper ad, postcard mailer, and public meeting notice on the City of Eugene's website
- The comments or a summary of the comments received
- The applicant's response to those public comments
- Meeting notes or summary from the public meeting(s)
- Meeting sign-in sheet/participant list

15. Named Contractors and Named Subrecipients

Not applicable. The City will select contractors in compliance with its public contracting rules for contracts that exceed \$100,000.



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region Eugene Office

165 East 7th Avenue, Suite 100

Eugene, OR 97401

(541) 686-7838

FAX (541) 686-7551

TTY 711

November 8, 2023

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

RE: FY2024 EPA Brownfield Cleanup Grant Application for Trainsong Park Project in Eugene, Oregon

Dear Terri:

The Oregon Department of Environmental Quality is pleased to acknowledge approximately \$1.5 million Cleanup Grant Application from the City of Eugene. The City's Trainsong Park project is enrolled in the state voluntary response program ([ESCI #6504](#)). A draft Analysis of Brownfields Cleanup Alternatives (ABCA) was completed in October 2023. A public meeting about the proposed cleanup project and ABCA was held on October 26, 2023. DEQ has determined that sufficient site characterization of environmental conditions has been performed for remediation work to begin.

DEQ conducted initial testing at Trainsong Park during fall of 2021 and winter of 2022, which identified elevated levels of dioxins and furans (dioxins) in shallow soils. Subsequently, the park was partially closed by the City of Eugene to protect park users. DEQ conducted additional testing at the park to evaluate the extent of contamination in February 2023. Results indicate the most elevated locations with dioxins at the park are located along the eastern and southeastern portions of the park. Due to the irregular distribution of dioxins found at and near the park, the source(s) of contamination are unknown.

The City of Eugene has owned the park property since the early 1980s and will conduct the cleanup of the site. The EPA Brownfield Cleanup grant will allow the City to remove contaminated soil found in a municipal park and restore it for recreational use and summer food programs for the nearby extremely impoverished community. Please contact Mary Camarata, DEQ Western Region Brownfields Coordinator at mary.camarata@deq.oregon.gov, 503-983-2277 if you have any questions.

Sincerely,

Brad Shultz
Cleanup Program Manager
Western Region

ec Emily Proudfoot, City of Eugene, EProudfoot@eugene-or.gov
Margaret Olson, EPA, Olson.Margaret@epa.gov
Rebecca Wells-Albers, HQ Brownfields Coordinator, Rebecca.WELLS-ALBERS@deq.oregon.gov
Chris Clough, Maul Foster & Alongi, cclough@maulfoster.com