



R10-24-C-005

Home of the Tualatin River National Wildlife Refuge

FY24 Brownfield Cleanup Grant Narrative Information Sheet

City of Sherwood
22560 SW Pine St.
Sherwood, OR 97140
Tel 503-625-5522
Fax 503-625-5524
www.sherwoodoregon.gov

Mayor
Tim Rosener

Council President
Keith Mays

Councilors
Renee Brouse
Taylor Giles
Doug Scott
Dan Standke
Kim Young

City Manager
Keith Campbell

1. Applicant Identification:

City of Sherwood
22560 SW Pine Street
Sherwood, OR 97140

2. Funding Requested:

- (a) Grant type: Single site cleanup
- (b) Federal funds requested: \$5 million

3. Location:

- (a) City: Sherwood
- (b) County: Washington
- (c) State: Oregon

4. Property Information:

Tax Lots 600 and 602
1210 SW Oregon Street
Sherwood, OR 97140

5. Contacts:

- (a) Project Director:
Jason Waters
City Engineer
City of Sherwood
971.979.2985
watersj@sherwoodoregon.gov
22560 SW Pine Street, Sherwood, OR 97140
- (b) Chief Executive:
Tim Rosener
Mayor
City of Sherwood
503.625.4246
rosenert@sherwoodoregon.gov
22560 SW Pine Street, Sherwood, OR 97140

6. Population: 20,222 (estimated as of 2022)

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 remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	p. 3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).	pp. 1, 2, 4, 6, 7, 9, 10
The proposed site(s) is in a federally designated floodplain.	pp. 1, 2, 6, 7
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy	p. 3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	pp. 3, 4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	pp. 1-3
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 Sherwood, Oregon (“City”; population 20,222; area 4.5 square miles), is in Washington County, approximately 20 miles southwest of Portland. **The City’s backyard is the 900-acre Tualatin River National Wildlife Refuge (TRNWR),** and the City is within the ancestral homelands of the Tualatin Band of the Kalapuyan Tribe, now part of the Confederated Tribes of Grand Ronde. The first settlers arrived in 1843 by wagon train. The City incorporated in 1893, and a brickyard developed around the same time, fueled by rich clay deposited by the Missoula Ice Age floods. Its bricks built historic Portland, and the brickyard closed in 1895 after one of several devastating fires between 1895 and 1911. The City’s economy then developed around leather tanning and fruit and vegetable canning. **The target area for this grant is the City’s industrial corridor in northeast Sherwood (census tract 321.04).** This area is home to the City’s lowest income neighborhood, Brickyard Terrace, which sits across Southwest (SW) Oregon Street from the proposed Brownfields site, the former Frontier Leather Tannery (see 2.a.i). **The target area has been impacted by the City’s industrial history and strict state and regional land use requirements, which create Brownfields challenges by limiting land available to accommodate growth.**

The City’s population grew 521% from 1990 to 2010. Even after slowing to 12% between 2010 and 2020, the City significantly exceeded the 7% median growth rate for Oregon municipalities over that period. Growth has increased demand for municipal services, such as public works, emergency response, and parks. Oregon’s unique statewide land use system requires all cities to restrict growth and preserve farmland and forests with an Urban Growth Boundary (UGB).¹ **Brownfield reuse is the City’s only option for creating space to serve its increasingly diverse residents. It will also protect the adjoining and sensitive TRNWR, bolster resilience by improving floodplain conditions, and reduce the risk that future flood events might spread contamination and impact nearby residents, who are disproportionately renters, lower income, already impacted by environmental justice (EJ) concerns (2.a). Brownfield reuse will also support economic development goals by making the City’s main jobs center more attractive to employers and will provide access to greenspace for and TRNWR for workers and underserved residents (1.b.ii).**

ii. **Description of the Proposed Brownfield Site:** The City’s proposed Brownfield site (“Site”) is the former Frontier Leather Tannery, located at 1210 SW Oregon Street. The Site is vacant with no structures, except for one small former pumphouse. It consists of 25 acres, over half of which (17.36 acres) is wetlands. These include two 3.4-acre former sedimentation (waste) lagoons. **A portion of the Site is located in the 100-year floodplain. Rock Creek and associated wetlands along the Site’s eastern boundary connect the Site to TRNWR.** SW Oregon Street – a major thoroughfare – separates the Site from Brickyard Terrace to the south. From 1947, Frontier Leather used chromium oxide to tan cow and deer hides from the local slaughterhouse at the Site and split them into halves. The less valuable halves were buried on Site, and sludge from wastewater treatment processes was discharged into the two lagoons. Frontier Leather also leased an onsite building to a series of lead-acid battery manufacturers from 1956 to 1972, which resulted in the removal of 743 tons of lead-contaminated soil in the mid-1990s. A fire nearly destroyed the facility in 1981. Portions were rebuilt, and the tannery remained in use until 1998, when Frontier Leather went bankrupt, leaving no viable responsible party. The tannery had been vacant for almost 10 years when it burned to the ground in 2006.

The Oregon Department of Environmental Quality (DEQ) added the Site to its Orphan Site List in 2002, and initial assessments identified chromium, lead, and other heavy metals in soil and sediment at concentrations exceeding human health and ecological risks. A FY14 EPA Brownfields Site-Specific Assessment grant funded a Phase II Environmental Site Assessment (ESA) and draft Analysis of Brownfields Cleanup Alternatives (ABCA; see 4.b.i.). Washington County acquired the Site through tax foreclosure between 2012 and 2014, and the City purchased the Site in 2023.

¹ This statewide land use system dates from 1974 and contains 19 goals. Goal 14 addresses Comprehensive Land Use Planning.

Metal concentrations are highest in the hide-split landfill and downstream of breaches in the former waste lagoons. The Site threatens the surrounding natural environment: previous assessments have identified metals in soil and sediment samples in Rock Creek, which discharges to TRNWR. Chromium-contaminated hides, stacked in layers and exposed by erosion, are easily accessible by wildlife and people, including those camping due to homelessness. Police activity has been documented related to criminal mischief, arson, and odor complaints. **The Site is an attractive nuisance** due to its unsecured location, frequent illegal dumping, presence of wetlands, and surrounding residential, commercial, and light industrial uses. **The Site also threatens the surrounding natural environment: previous assessments have identified metals in soil and sediment samples in Rock Creek, which discharges to TRNWR.**

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: Reuse strategies focus on public uses, **and on protecting the floodplain, wetlands, and TRNWR.**² A 50-foot environmental buffer will separate the developable portion of the Site from the floodplain, providing a wildlife corridor and habitat, plus public education and recreational opportunities (1.b.ii and 1.c). By supporting increased water storage capacity in the 100-year floodplain, the **buffer enhances Site resilience**: regional climate change models estimate a 32% increase in 100-year extreme precipitation events by 2050, and **added on-Site flood storage reduces flood risks.**³ This reuse strategy could also support establishment of a City-run wetland mitigation bank (3.a). **Reuse strategies for the wetlands portion include a new green infrastructure regional water quality installation to treat currently untreated stormwater** from across east Sherwood (a 50-acre basin) before discharging into Rock Creek. **Reuse strategies for the developable portion include greenspace and/or an expanded public works and emergency operations center, to include community space and a resilience hub, like a heating or cooling center. The City plans robust public visioning and engagement to further specify reuse strategies.**

Different community groups and project partners have expressed a desire for Site redevelopment for over 20 years. Since 2015, the City has maintained a project website and held numerous public meetings regarding the Site (see 4.b.i(1)), which has targeted hard-to-reach groups, including people with low-income and people with disabilities. Table 1 shows how reuse strategies align with local and regional land use and revitalization plans.

Table 1. Local and Regional Plans Related to Site Reuse

Entity	Plan	How Project Relates
City	2040 Comprehensive Plan	Economic policies include supporting and encouraging infill and redevelopment in existing commercial areas. Community and cultural heritage policies support collaborative and inclusive community engagement to reach the entire community. Governance and growth management policies encourage land use patterns that reduce or shorten vehicle trips and encourage energy conservation. Ecosystem policies support pursuing funding for the acquisition, protection, or enhancement of natural areas; they also support Brownfield cleanup for reuse and redevelopment of property.
City	Sherwood Seismic Resilience Plan	Identifies current public works facility as vulnerable in a major earthquake. Notes the need for a new structure built to seismic standards.
City	Parks Master Plan	Supports preservation and enhanced accessibility of natural areas to the community.
Sherwood City Council	2023-2024 City Council Goals	Pillar 2 (Infrastructure), Deliverable 2.9 prioritizes Site cleanup and reuse for public purposes.
Oregon Metro	Tonquin Ice Age Trail Master Plan	Supports development of a 22-mile multi-use trail that will run along SW Oregon Street (adjacent to Site) and connect cities of Sherwood, Wilsonville, and Tualatin.
Oregon Metro	Six Desired Regional Outcomes	All six regional pillars are relevant, including creating vibrant communities where everyday needs are easily accessible; economic competitiveness and prosperity; safe, reliable, and sustainable transportation choices; leading on climate change, and healthy ecosystems and equity for current and future generations.

² Tannery Site Assessment Fact Sheet. 2018.

https://www.sherwoodoregon.gov/sites/default/files/fileattachments/Planning/page/4239/brownfields_fact_sheet_january_2018.pdf

³ Morgan, H., Mauger, G., Won, J., Gould, D. 2021. *Projected Changes in Extreme Precipitation Web Tool*. University of Washington Climate Impacts Group: <https://doi.org/10.6069/79CV-4233>.

ii. Outcomes and Benefits of Reuse Strategy: **Reuse will protect City residents, Rock Creek, and TRNWR’s sensitive environment, including endangered and threatened species, from contamination (2.a).** The City will explore establishing a wetland mitigation bank and will consider donating part of the Site’s wetlands to TRNWR (3.d). Reuse could also benefit City operations and therefore all residents by providing **additional space for public functions and services.** This is particularly important given the City’s rapid growth (1.a.i.) and expanded service needs. Public works personnel are critical emergency first responders, but the current public works building is projected to be unusable following a major earthquake. An improved emergency operations center would improve resilience to earthquakes, floods from larger storms and other disasters, and support emergency response and long-term social and economic recovery. This would benefit vulnerable and sensitive populations who are more likely to be disproportionately impacted (2.a.ii). **Any public buildings at the Site would be constructed to energy-efficient standards (e.g., LEED or similar), and reuse plans would consider development of solar generation and a disaster-resilient microgrid.** Site reuse will facilitate development of a critical segment of the regional, multi-use Tonquin Ice Age Trail (“Trail”) along SW Oregon Street, which will include signage explaining the impact of the Missoula Ice Age floods on the City’s geology (1.c.i-iii). Reuse will therefore improve access to trails for Brickyard Terrace residents, who are farther from existing trails and are also more likely to be low-income or people of color (2.a.i.).

The Trail will make the 250-acre Tonquin Employment Area (TEA), located 500 feet east of the Site, more attractive to employers; reuse therefore supports job creation and local economic development. The TEA is the City’s primary employment cluster, and by 2028, it will host over 3,500 family-wage light manufacturing and technology jobs. 90% of the local workforce commutes outside the City, and 53% of these commute 10-25 miles or more.⁴ The Climate and Economic Justice Screening Tool (CEJST) ranks the City in the 80th percentile nationally for transportation barriers (average of relative cost and time spent on transportation), which likely relates to commuting burdens. **More local, family-wage jobs benefit residents at all income levels by reducing out-commuting and related emissions and diversifying the economy and taxbase.**

c. **Strategy for Leveraging Resources;** i-iii. Resources Needed for Site Characterization/Remediation /Reuse: **Site characterization is complete and requires no additional funding.** Cleanup is ready to proceed upon grant award. Due to the rising costs of other critical infrastructure projects, the City has insufficient funding to support remediation. The City's CIP shows cleanup as an unfunded project pending this grant. Remediation costs exceed the grant budget by \$659,991, and the City will seek the state resources shown in Table 2 to support completion of cleanup and reuse. While these resources are unsecured, the City has had initial conversations with Business Oregon to make its need known. Importantly, cleanup will allow several existing and planned CIP projects to proceed, leveraging an estimated \$1.28 million in committed City funding for reuse via stormwater green infrastructure and SW Oregon Street improvements, as well as potentially millions of dollars in private investment and job creation at the TEA.⁵

Table 2. Resources to Support Site Reuse (All Unsecured)

Name of Resource	Is the Resource for (1.c.i) Assessment, (1.c.ii) Remediation, or (1.c.iii) Reuse Activities?	Additional Details or Information
Business Oregon Brownfields Redevelopment Fund	1.c.ii – Remediation	Could support remediation through loans or grants.
Business Oregon Brownfields Cleanup Fund	1.c.ii – Remediation	Could support remediation through loans or grants.
Oregon DEQ Clean Water State Revolving Fund (CWSRF)	1.c.iii – Reuse	Could support infrastructure, specifically regional water quality system and buffer via low-interest, partially forgivable loans.

⁴ U.S. Census Bureau. 2020. OnTheMap: <https://onthemap.ces.census.gov/>.

⁵ Documentation of committed leveraging is provided in the Sherwood Capital Improvement Plan (FY2023/24-FY2028/29): https://www.sherwoodoregon.gov/sites/default/files/fileattachments/Engineering/page/4142/cip_6-14-23.pdf. A highlighted version is attached.

Oregon Watershed Enhancement Board (OWEB)	1.c.iii – Reuse	Could support infrastructure, such as a regional water quality system and buffer, which supports restoration of Rock Creek and improves water quality, flow, and fish habitat. May support public education for watershed protection.
Oregon Department of Energy (ODOE) Community Renewable Energy Grant Program	1.c.iii – Reuse	Could support planning/construction of community energy resilience infrastructure, such as a microgrid associated with expanded public facilities/emergency operations center at the Site.
Oregon Parks & Recreation Dept. Local Government Grants	1.c.iii – Reuse	Could support interpretive signage/facilities along the new Trail to enhance access, connectivity, and mobility.
Oregon Parks & Recreation Dept. Recreational Trails Grant	1.c.iii – Reuse	Could support Trail construction, interpretive signage, and related safety and education projects.

iv. Use of Existing Infrastructure: The Site has no existing infrastructure, and reuse requires water, sewer, stormwater, electrical, broadband, road connections, and internal road networks. City infrastructure is available adjacent to the Site, and SW Oregon Street is a major thoroughfare slated for development of the regional, multiuse Tonquin Ice Age Trail (2.b.ii). To support infrastructure development, the City will pursue infrastructure-focused grants and loans listed in Table 2, and has had initial conversations with funders.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. **Community Need**; i. The Community’s Need for Funding: The City is one of the smallest by population in the Portland Metro region and lacks the resources necessary to clean up this regionally significant Brownfield (1.c.i-iii). Cleanup would preserve the health of TRNWR, which is home to hundreds of species, including the threatened Upper Willamette River Steelhead, Chinook Salmon, and Monarch butterfly. **Tissue samples show fish may be accumulating chromium and other metals from the Site, and the U.S. Fish and Wildlife Service has expressed concern about the Site being an attractive ecological risk to waterfowl, as TRNWR is a key stopover for migratory birds on the Pacific Flyway.**

The Site is in the northeastern corner of census tract 321.04. Because census tracts cover large areas, higher-income neighborhoods in other areas of tract 321.04 skew the demographic data, which fail to show income-related community need. More granular census block group data show that income in the southern portions of tract 321.04 is higher than in Brickyard Terrace, closer to the site.⁶ At 3.5% unemployment, the 2021 unemployment rate in tract 321.04 is also 35% higher than in the City as a whole (2.6%).⁷ Brickyard Terrace has significantly lower home values, denser housing, and more manufactured and multi-family units compared to the City. The median home value in the City is \$680,000,⁸ but a home in Brickyard Terrace recently sold for 20% of the median, and another sold for 41% of the median price.

School district demographic data for both the City and Hawk’s View Elementary school, located less than 1 mile from the Site in Brickyard Terrace, provide further support: 11% of City students receive free and reduced lunch, versus over 95% of students at Hawk’s View Elementary School.⁹ These data support the assertion that that average incomes in Brickyard Terrace are lower compared to the rest of census tract 321.04.

Over 25% of City residents rent. Of these, 40% are cost-burdened, and 20% are severely cost-burdened. The concentration of multi-family rental units in Brickyard Terrace indicate it is likely home to more cost-burdened renters, who regionally are more likely to be minorities and households with children.¹⁰ Housing cost-burdens

⁶ US Census Bureau. 2021. American Community Survey 5-Year Estimates (2017-2021) – Median Household Income in the Past 12 Months: <https://data.census.gov/table/ACSDT5Y2021.B19013?q=income&g=1500000US410670321041,410670321042,410670321043>.

⁷ US Census Bureau. 2021. American Community Survey 5-Year Estimates (2017-2021):

⁸ Redfin Sherwood, OR Housing Market: <https://www.redfin.com/city/17173/OR/Sherwood/housing-market>.

⁹ Oregon Department of Education At-A-Glance Profiles and Accountability Details: <https://www.ode.state.or.us/data/reportcard/reports.aspx>.

¹⁰ HUD defines cost-burdened renter households as those paying more than 30% of their income for rent and utilities. Severely cost-burdened renters pay more than 50%. For details, see Sherwood Housing Needs Analysis (2019-2039): https://www.hbapdx.org/uploads/1/1/6/8/116808533/sherwood_hna_adopted2020compressed1.pdf.

perpetuate inequities by limiting resources for food or education to support child development.¹¹ The prevalence of multi-family units in Brickyard Terrace indicates this area likely experiences disproportionate renter cost burdens compared to other parts of the City, and demographic trends indicate Sherwood’s rent-burdened households are more likely to be those with children (2.a.ii).

ii. Threats to Sensitive Populations; 1) Health or Welfare of Sensitive Populations: Per Table 3, the City and census tract 321.04 are home to more children under 18 and females of childbearing age than the county and state. The City is in the 78th percentile statewide and the 70th nationally for children under 18.¹² The City is also aging: its fastest growing population from 2000-2010 were people over 45, the youngest of whom will be 65 in 7 years. By 2035, 24% of Washington County’s population will be over 60.¹³ Just outside tract 321.04, Brickyard Terrace includes The Springs, a 173-resident senior living facility ¼-mile from the Site.

Table 3. Sensitive Populations in the Target Area.

Population	Target Area Census Tract 321.04	Sherwood	Washington County	Oregon	United States
Age Above 65	11%	10%	13%	18%	17%
Age Under 18	25%	29%	23%	21%	22%
Age Under 18 Below Poverty	0%	1%	2%	3%	13%
Female ages 15-44	22%	20%	21%	20%	20%

Source: 2021 American Community Survey 5-Year Estimates

Site reuse will remove contaminated soils and stabilize contaminated sediment that could threaten the health of sensitive populations, while Site cleanup will spur development of the Trail, connecting these groups with TRNWR and enhancing access to trails and greenspace for recreation and education (2.a.iii.2b).

2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Table 4 shows City residents are 6.6% more likely to experience cancer than Washington County residents, and 8.3% more likely than U.S. adults. They are also 5% more likely to experience asthma compared to U.S. adults. Site reuse will reduce access to potentially carcinogenic contaminants and enhanced greenspace supports improved air quality. Reuse will also improve community health by connecting Brickyard Terrace with the Trail.

Table 4. Inequitable Health Burdens.

Cancer (excluding skin cancer) among adults aged >=18 years (age-adjusted prevalence, %)			Current asthma among adults aged >=18 years (age-adjusted prevalence, %)		
Sherwood	WA County	U.S.	Sherwood	WA County	U.S.
6.5	6.1	6	10.2	10	9.7

Notes: 2021 CDC PLACES Data. WA County = Washington County, Oregon.

3) Environmental Justice; (a) Identification of EJ Issues:

Per CEJST, census tract 321.04 is not disadvantaged. Notably, adjacent census tract 320.03 is disadvantaged based on housing costs, lack of indoor plumbing, proximity to Risk Management Plan (RMP) facilities, and low income, showing how higher income areas in tract 321.04 skew its statistics (2.a.i). EJScreen 2.2 results for tract 321.04 in Table 5 show Supplemental Indexes (which combine social vulnerability data with a single environmental indicator) equal to or exceeding the 60th percentile in the state or U.S. for three variables and four EJ Screen 2.2 pollution and sources indicators exceed the 60th percentile in the state or U.S. These results do not show challenges in tract 320.03 or other adjoining census tracts. Challenges in adjoining tracts¹⁴ are unlikely to stop at tract 321.04’s boundary. Adjoining tracts show EJScreen 2.2 EJ Indexes (which combine a single environmental factor with low-income populations and people of color populations) exceeding the 60th percentile in the state or U.S. for particulate matter (PM) 2.5, diesel PM, air toxics cancer risk and respiratory

¹¹ Enterprise (2014). “Impact of Affordable Housing on Families and Communities”: <https://homeforallsmc.org/wp-content/uploads/2017/05/Impact-of-Affordable-Housing-on-Families-and-Communities.pdf>.

¹² USDOT Equitable Transportation Community Explorer: <https://experience.arcgis.com/experience/0920984aa80a4362b8778d779b090723/page/ETC-Explorer---State-Results/>

¹³ This is a rapid increase from 18% in 2015: https://www.hbapdx.org/uploads/1/1/6/8/116808533/sherwood_hna_adopted2020compressed1.pdf.

¹⁴ Includes data for Oregon census tracts 41067032104 (target area), 41067032003, 41067032107, 41067032112, and 41005022707.

hazard index, risk management plan facility proximity, and hazardous waste proximity. EJ Screen 2.2 results for tract 321.04 also do not show known equity concerns, like housing and access to food via school free/reduced lunch programs (2.a.i). U.S. Department of Transportation (USDOT) Equitable Transportation Communities (ETC) data shows the City is in the 60th percentile in the state or U.S. for six of 15 indicators. Impaired surface water quality is a significant concern given the City’s ecological connectedness to TRNWR.¹⁵

Table 5. EJ Data for Census Tract 321.04.

Tool	Category	Selected Variables	%ile in State	%ile in U.S.
EJ Screen 2.2	Supp. Index	PM 2.5	64	51
	Supp. Index	Air Toxics Respiratory Hazard Index	36	60
	Supp. Index	RMP Facility Proximity	60	56
	Pollution & Sources	PM 2.5	96	81
	Pollution & Sources	Diesel PM	55	78
	Pollution & Sources	Air Toxics Respiratory Hazard Index	37	70
	Pollution & Sources	RMP Facility Proximity (facility county/distance)	89	90
USDOT ETC		PM 2.5	81	70
		Diesel PM	56	69
		Air Toxics Cancer Risk	54	71
		RMP Facility Proximity	65	65
		Railway Proximity	71	69
		Impaired Surface Water	67	71
Notes: Shading indicates that tract ranks above the 60th percentile in the state or US among impacted areas. PM = particulate matter; Supp. = supplemental; RMP Facility = facility that has submitted a risk management plan to EPA				

(b) Advancing Environmental Justice: Site cleanup and reuse will reduce risks to human and environmental health in and around Brickyard Terrace and Rock Creek by removing legacy pollution and improving water quality and preserving the health of TRNWR. The new green infrastructure stormwater management installation will directly address impaired surface water (2.a.iii.2a). Site reuse will also enhance access to the Trail and TRNWR, providing safe outdoor recreational opportunities. The Trail will leverage TEA to improve access to active transportation options to local jobs (2.a.iii.2a), thereby reducing transportation barriers and decreasing commuting-related air quality burdens. Site reuse plans that could expand public services also benefit underserved communities, which experience disproportionate impacts from emergencies.¹⁶ Site reuse will improve floodplain conditions, enhance water retention, remove contamination that could spread to nearby communities via flooding (see 1.b.i.), and potentially develop a more resilient emergency response center to serve all City residents.

b. Community Engagement; i. Project Involvement and ii. Project Roles

Table 6. Selected Project Partners and Their Roles.

Name of Organization/Entity/Group	Point of Contact	Specific Project Role or Assistance Provided
Sherwood City Council	Mayor Tim Rosener rosenert@sherwoodoregon.gov 503.625.4246	Advertise community meetings via websites, newsletters, and social media. Facilitate public meetings and engage the community around Site reuse. Collect and share community feedback and questions with City staff and advise on community engagement and messaging.
Clean Water Services (regional water resources management utility)	Elle Wörrlein, PE, Development Services Program Manager; 503.681.3650 worrleine@cleanwaterservices.org	Provide subject matter expertise and engage community on Site redevelopment, infrastructure development, and watershed impacts. Advertise community meetings via website, billing notices, newsletters, and social media.
Sherwood School District	Jessie Palmer, Environmental Science Teacher (Sherwood High School) jpalmers@Sherwood.k12.or.us	Engage youth in educational opportunities related to environmental careers and provide project details/community meeting information in multiple languages to students and

¹⁵ USDOT Equitable Transportation Community Explorer: <https://experience.arcgis.com/experience/0920984aa80a4362b8778d779b090723/page/ETC-Explorer---State-Results/>

¹⁶ UN Disaster Risk Reduction Prevention Web, “Poverty and Inequality”: <https://www.preventionweb.net/understanding-disaster-risk/risk-drivers/poverty-inequality#:~:text=Vulnerability%20is%20not%20simply%20about,invest%20in%20risk-reducing%20measures.>

Name of Organization/Entity/Group	Point of Contact	Specific Project Role or Assistance Provided
	503.825.6000	families. Support coordination with nonprofits serving underserved communities.
Tualatin River National Wildlife Refuge (US Fish and Wildlife Service)	Richard Mykut, Wildlife Biologist Richard_Mykut@fws.gov 503.625.5944	Subject matter expert on benefits of protecting and connecting bike/ped with TRNWR. Help with outreach via events, e.g. TRNWR Migratory Bird Festival.
Sherwood Chamber	Renee Brouse, Exec. Director Chamber@sherwoodchamber.org 503.625.7800	Engaging/informing business leaders, hosting speakers and outreach events, advertising, and hosting public meetings.
Tualatin Valley Fire & Rescue	Deric Weiss, Fire Chief; dweiss@tvfr.org ; 503.649.8577	Hosting public meeting events at Station 33's community meeting room, near Site.

iii. **Incorporating Community Input:** The City's priority is to meaningfully engage and solicit from stakeholders directly impacted by the project, especially underserved communities in Brickyard Terrace. The City will develop a Public involvement Plan (PIP) to build on past community engagement efforts and meaningfully engage as many diverse stakeholders as possible (4.b.i). The PIP will outline planned engagement activities according to project timelines, target audiences, and engagement best practices. The City anticipates holding eight in-person community meetings, with virtual options to facilitate maximum participation. Reuse visioning will occur at several meetings (Table 7), and meetings will coincide with major project milestones like project initiation (meeting 1), ABCA finalization (meeting 2), development of cleanup plans and selection of remediation contractor (meetings 3, 4), cleanup (meetings 5, 6), post-cleanup (meeting 7) and grant closeout (meeting 8). The City will work with project partners to advertise meetings via partner newsletters, social media, websites, and the newspaper. The City will collect meeting attendance, record all public comments, and consider them in cleanup implementation. The City will transparently post online and share in subsequent public meetings which feedback it incorporated and how, and which it did not or could not, and why.

The City will publish monthly blogs, articles, social media posts, website updates, or press releases to keep the community informed throughout the project, including quarterly updates at City Council meetings. It will work with project partners to provide at least two field trips to support community and career education for diverse stakeholders like youth, Brickyard Terrace residents, and underserved communities (4.a.iii).

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The preferred remedial action (draft ABCA Alternative 2) includes excavation and off-site transportation of contaminated soils and sediments with metals concentrations above cleanup levels. This includes approximately 17,000 cubic yards of contaminated sediments from the north and south sedimentation lagoons and 2,725 cubic yards of sediments outside the lagoons in the Rock Creek floodplain. Contaminated sediments will be excavated during dry weather conditions when the water table is lower and sediments are not saturated. If necessary, sediments will be temporarily stockpiled on plastic sheeting and allowed to dry before transporting off site to an appropriate landfill 18 miles away. Approximately 25,300 cubic yards will be excavated from the hide-split landfill, including commingled soil, and will be transported 23 miles to landfill. Excavated areas will be backfilled and compacted to existing grade with suitable fill from the berms of the existing sedimentation lagoons or imported from a local source. An area of 3.9 acres of designated wetlands in the excavated area will be restored and enhanced, including sedimentation lagoon berm areas, which will be converted into a constructed wetland. The City is exploring options with the Oregon Department of State Lands (DSL) that could allow it to use cleanup to establish these 3.9 acres of restored and improved wetlands as a mitigation bank. This alternative will allow for the greatest amount of wetland reconstruction and would contribute to enhanced flood control along Rock Creek and TRNWR. The City will follow green remediation best practices where possible, such as use of biodiesel where practical.

b. Description of Tasks/Activities and Outputs; i-iv. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, Outputs

Table 7. Tasks and Activities.

Task 1 – Project Management	
i. The City will be responsible for overall project execution and management, and will monitor schedule and budget, report on activities and accomplishments to stakeholders, and oversee QEP, which will support documentation and reporting. City and QEP will meet monthly. Three City staff will attend 1 National Brownfields Training Conference and 3 state or regional conferences.	
ii. Schedule: QEP procured in compliance with 2 CFR 200.317-326 and all applicable EPA guidelines and best practices in Oct. 2023 (see threshold criteria). Work will begin upon completion of EPA-approved workplan, assumed Oct. 1, 2024 to Sept. 30, 2028.	
iii. Lead: City, Assist: Qualified Environmental Professional (QEP)	
iv. Outputs: 48 project team meetings, 15 quarterly reports, 4 MBE/WBE reports, 4 Federal Financial Reports, attendance at 1 National Brownfields Training Conference, attendance at 3 state/regional Brownfields conferences, 16 quarterly ACRES updates.	
Task 2 – Community Engagement	
i. City will develop a PIP and conduct 8 community meetings at key project milestones (2.b.iii). City will work closely with project partners to conduct direct outreach to impacted neighbors, especially Brickyard Terrace, Hawk’s View Elementary School, and The Springs senior living facility. City has budgeted participant support costs, including stipends to cover time, loss of wages to attend meetings, and other incentives/costs associated with meeting attendance, including transportation and childcare.	
ii. Schedule: Oct. 1, 2024 to Sept. 30, 2028. Community meetings in Nov. 2024 (kickoff, ABCA review, reuse visioning), Mar. 2025 (ABCA review/finalization, reuse visioning), Jul. 2025 (reuse visioning), Dec. 2025 (pre-construction, cleanup plan development), May and Dec. 2026 (cleanup), May 2027 (post-cleanup) and Mar. 2028 (grant completion). Other meetings as needed.	
iii. Lead: City, Assist: QEP	
iv. Outputs: 1 PIP, 16 City Council updates, 7 community meetings and notes/attendance/recordings, website and online information repository, 16 press releases/blogs/website updates/social media posts, and direct community outreach as needed.	
Task 3 – Cleanup Planning	
i. Activities will include a 30-day ABCA public review and comment period; finalizing ABCA to incorporate comments from public notice and regulatory review; obtaining approval from R10 EPA Project Manager; securing all permits/regulatory approvals; developing Site cleanup plans including HASP, QAPP and SAP; completing 100% design documents; preparing bid documents for soliciting cleanup contractors; and completing bidding process.	
ii. Schedule: Jan. 1, 2025 to June 30, 2026	
iii. Lead: QEP, Assist: City	
iv. Outputs: 1 final ABCA; 1 HASP, QAPP, SAP; 100% design documents; 1 set of bid documents; 1 cleanup plan	
Task 4 – Site Cleanup	
i. The majority of grant funds support Site cleanup. The City will competitively procure a remediation contractor in compliance with state regulations and 2CFR 200.317-326, which Project Manager will oversee with QEP assistance. Contractor cleanup activities will include excavation and removal of contaminated soil and hides, as well as wetland restoration. QEP will work with City to ensure cleanup meets state, City, and federal regulations.	
ii. Schedule: May 1, 2026 to Apr. 30, 2028	
iii. Lead: Contractor, Assist: City, QEP	
iv. Outputs: 1 grant close-out report detailing cleanup progress and any remaining needs	
Notes:	PIP = Project Involvement Plan
ABCA = Analysis of Brownfields Cleanup Alternatives	QAPP = Quality Assurance Project Plan
ACRES = Assessment, Cleanup and Redevelopment Exchange	QEP = Qualified Environmental Professional
HASP = Health and Safety Plan	R10 EPA = EPA Region 10

Any City staff time in excess of that identified in the following Tables 8 and 9 will be contributed in-kind at a rate of \$98/hour (\$70 personnel and \$28 fringe benefits).

c. Cost Estimates

Table 8. Project Budget Table.

Budget Categories		Project Tasks (\$)				Total
		Task 1: Project Management	Task 2: Community Outreach	Task 3: Cleanup Planning	Task 4: Site Cleanup	
Direct Costs	Personnel	\$15,680	\$12,460	\$9,100	\$16,800	\$54,040
	Fringe Benefits	\$6,272	\$4,984	\$3,640	\$6,720	\$21,616
	Travel	\$12,000	\$0	\$0	\$0	\$12,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$2,500	\$0	\$0	\$2,500
	Contractual	\$21,200	\$25,800	\$94,400		\$141,400
	Construction	\$0	\$0	\$0	\$4,753,444	\$4,753,444
	Participant Support Costs	\$0	\$15,000	\$0	\$0	\$15,000
Total Direct Costs		\$55,152	\$60,744	\$107,140	\$4,776,964	\$5,000,000
Indirect Costs						

Budget Categories	Project Tasks (\$)				Total
	Task 1: Project Management	Task 2: Community Outreach	Task 3: Cleanup Planning	Task 4: Site Cleanup	
Total Budget (Direct + Indirect Costs)	\$55,152	\$60,744	\$107,140	\$4,776,964	\$5,000,000

Table 9. Development of Cost Estimates

Task 1 – Project Management: \$55,152
Personnel and Fringe total: \$21,952 (\$15,680 personnel + \$6,272 fringe benefits) 48 monthly team meetings with prep/follow-up (\$98/hr [\$70/hr personnel + \$28/hr fringe] x 48 hrs = \$4,704); provide project oversight, such as reviewing QEP-prepared reports (\$98/hr x 80 hrs = \$7,840); program management, including financial management (\$98/hr x 96 hrs = \$9,408)
Travel Costs for Three City staff: \$12,000 National Brownfields Training Conference (1 conference x 3 people x \$1,600/person = \$4,800) State or regional Brownfields conferences (3 conferences x 3 people x \$800/person = \$7,200)
Contractual costs: \$21,200 48 project team meetings (48 x \$200/hr x 1 hr = \$9,600); 15 quarterly reports (15 x \$200/hr x 2 hrs = \$6,000); 1 final summary report (12 hours x \$200/hr = \$2,400); ACRES updates (16 x \$200 x 1 hr = \$3,200)
Task 2 – Community Engagement: \$60,744
Personnel and Fringe total: \$17,444 (\$12,460 personnel + \$4,984 fringe benefits) Review/finalize PIP (\$98/hr [\$70 personnel + \$28 fringe] x 8 hrs = \$784); plan/facilitate 8 community outreach meetings (\$98/hr x 48 hrs = \$4,704); conduct direct outreach to key constituencies (\$98/hr x 50 hrs = \$4,900); monthly updates for social media, website, press (\$98/hr x 72 hrs = \$7,056)
Supplies: \$2,500 Production of print and online materials for direct community outreach, such as fliers and posters (\$2,500)
Contractual costs: \$25,800 Public Involvement Plan (12 x \$200/hr = \$2,400); Community outreach meetings (8 x \$200/hr = \$1,600); Articles/media and website updates (39 hrs x \$200/hr = \$7,800); Direct engagement with impacted stakeholders (50 hrs x \$200/hr = \$10,000); Interpretation and translation (20 hrs x \$200/hr = \$4,000)
Participant Support Costs (PSCs): \$15,000 \$13,000 in stipends to cover time, lost wages due to meeting attendance, and other incentives and/or costs due to meeting attendance, like transportation. Includes \$2,000 (\$100/hr x 20) for childcare provider for after-hours community meetings. City will obtain approval from EPA before paying out PSCs and will track disbursements.
Task 3 – Cleanup Planning: \$107,140
Personnel and Fringe total: \$12,740 (\$9,100 personnel + \$3,640 fringe benefits) Project oversight, including ABCA review/finalization, review remedial design documents, support permitting efforts, review site workplans, prepare bid documents, attend pre-bid site meetings, evaluate bids and check references, select contractor and coordinate with/oversee QEP (\$98/hr [\$70 personnel + \$28 fringe] x 130 hrs = \$12,740)
Contractual costs: \$94,400 Update and finalize ABCA incorporating comments from public notice and regulatory review (average rate of \$150/hr x 50 hours = \$7,500); Remedial design (\$170/hr x 105 hrs = \$17,850); Permitting (\$170/hr x 175 hours = \$29,750 + \$15,000 permit fees = \$44,750); Develop Site Workplans including HASP, QAPP, and SAP (\$150/hr x 60 hour = \$9,000); Prepare 100% design documents; prepare bid documents; attend pre-bid site meetings; assist as requested with bid evaluation and reference checking to support contractor selection (\$170/hr x 90 hours = \$15,300).
Task 4 – Site Cleanup: \$4,776,964
Personnel and Fringe total: \$23,520 (\$16,800 personnel + \$6,720 fringe) Oversight of QEP, regulatory communication and correspondence, closeout report (\$98/hr [\$70/hr personnel + \$28/hr fringe] x 240 hrs = \$23,520)
Construction costs: \$4,753,444 Cost estimates from 2018 draft ABCA, updated to 2023 dollars. Contractor site preparation/mobilization/demobilization (588.25 hrs x \$170/hr = \$100,000); Vegetation removal (\$3,500/acre x 17 acres = \$59,500); Install gravel surfacing to minimize erosion, prevent contamination spread (\$50/CY x 3,500 CY = \$175,000); Excavation and grading (\$20/CY x 50,000 CY = \$1,000,000); Transport/disposal of contaminated soil/hides to appropriate landfills (\$67/ton x 40,149 tons = \$2,690,009); Wetland restoration (\$43,500/ac x 12.5 ac = \$543,750); Excavation oversight/monitoring and closure sampling (\$111/hr x 885 hrs = \$98,235); Laboratory analysis for chromium (\$20/sample x 410 samples = \$8,200); Regulatory correspondence and communications throughout project, prepare construction/closeout reports (\$175/hr x 450 hrs = \$78,750)

d. Plan to Measure and Evaluate Environmental Progress and Results

The City will track and evaluate progress monthly, coordinating with the QEP and project contractor. It will measure/report outputs and other deliverables with quarterly progress reports and in ACRES. Measurement will compare quarterly achievements to output/outcome goals, so that deviations can be identified and corrected as they occur. **Measurable cleanup results within the four-year grant period are: Removal of approximately 45,025 cubic yards of contaminated soil and hides from the Site; decrease in chromium, lead, and other metals in soil and Rock Creek sediments; preservation easements for 50-foot wetland buffer; consolidated lot lines, with potential donation of sensitive wetlands at Site’s east to TRNWR; increase in wetland buffer and wetland area; and increased floodplain capacity due to environmental restoration.**

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability; i. Organizational Structure and ii. Description of Key Staff: The City has the knowledge and experience required to manage this grant. City staff engaged in this project are experienced grant administrators capable of successfully and timely expenditure of EPA funds, meeting all technical, administrative, financial, and reporting requirements. **Key member is Project Director Jason Waters, P.E., City Engineer.** Jason has over 20 years' experience managing and delivering large public improvement projects and will manage the project day-to-day. He will work with QEP to develop, review, and approve all reports, ACRES submissions, and deliverables. He will also lead City efforts to select a remediation contractor and will serve as the City's primary budget manager. **Jason will coordinate closely with David Bodway, Project Financial Manager and the City's Finance Director,** who will manage and approve EPA funds tracking and submission of reimbursement requests. David has 18 years' experience in government finance and accounting, and holds a Masters in Public Administration from Portland State University. **Jo Guediri, Engineering Program Associate, will serve as Administrative Support.** Jo has over 20 years' experience administering complex public construction contracts, including project setup and payments. She will support development of payment requests, review of payment processing, and preparing and submitting grant reimbursement requests. **Tammy Stevens, Volunteer Coordinator, will serve as the City's Community Outreach Lead,** coordinating with Jason. Tammy has worked with the City for 10 years and enjoys strong connections with local nonprofits and other partners. **Craig Sheldon, Public Works Director, will serve as the Project Supervisor,** and will be accountable for the project and City team's success. He will support Jason with reports to City Council. Craig has over 34 years' experience completing construction and public works projects.

iii. Acquiring Additional Resources: The City has staff and systems in place to assist with and support efficient staff transitions should unforeseen events take place. This will eliminate project delays and ensure staff have appropriate qualifications and experience. The City procures \$2.2 million of contractor services annually and has the staff and procedures in place to acquire these through a competitive, qualifications-based process compliant with 2 CFR 200.317 - 200.326. Through its partnership with Sherwood School District, as well as Portland Community College and Oregon Tradeswomen,¹⁷ the City will leverage this grant to connect diverse community members with Brownfields redevelopment careers. This could include facilitating field trips, holding Q&A sessions with professionals working at the Site, and sharing project updates (2.b.iii).

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant; 1) Accomplishments: The City successfully managed a \$200,000 2014 EPA Brownfields Site-Specific Assessment Grant (assistance ID number BF 00J93201), which closed September 30, 2019. It developed a strong relationship with DEQ in the process. The award supported a Phase II ESA at the Site, and a wetlands report that was approved on May 18, 2017 by the DSL. The award also supported a draft ABCA and public meetings in July 2015, July 2016, and August 2017. At the final meeting, the Sherwood City Planning Commission and public discussed the draft ABCA. In developing the ABCA, the City and its QEP also held two publicly noticed work sessions with the City Council. The QEP revised the ABCA to address comments from the community and DEQ received in April 2018, and submitted a revised document to DEQ and EPA on July 23, 2018, after which no comments affecting the conclusions or recommendations in the ABCA were received. Associated outputs and outcomes are accurately reflected in ACRES. The ABCA has been available on the project website since 2018.

2) Compliance with Grant Requirements: The City successfully managed, drew down, and complied with the terms, conditions, workplan, and schedules associated with the FY14 grant, including all required reporting. The City submitted all quarterly, annual, and other required reports in a timely manner and completed this grant on schedule, following all EPA rules and regulations. EPA grant manager received copies of all deliverables, and no funds remained upon grant closure.

¹⁷ Oregon Tradeswomen is a Portland non-profit that received EPA Brownfields Environmental Workforce and Job Training Grants from 2004-2017.

Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

- a. The City of Sherwood is eligible to apply for an EPA Brownfields Cleanup Grant as a general-purpose unit of local government.
- b. The City of Sherwood is not exempt from taxation under Section 501(c)4 of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

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 Sherwood affirms it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The City of Sherwood owns the proposed target site.

5. Basic Site Information

- a. Site Name: Former Frontier Leather Tannery
- b. Site Address: 1210 SW Oregon Street, Sherwood, OR 97140

6. Status and History of Contamination at the Site

(a) Contamination by Hazardous Substances or Petroleum

Site soil contains high concentrations of chromium, especially within the hide-split landfill, sedimentation lagoons, and downstream of breaches in lagoon berms. Prior assessment determined that soils in the hide-split landfill pose an unacceptable risk to human health. Sediment contains high concentrations of chromium and manganese near a drainage ditch downstream of the sedimentation lagoons. Surface water and groundwater contain all metals, except mercury. Arsenic and lead were also found in soils.

(b) The Operational History and Current Use(s) of the Site

The site was the location of the former Frontier Leather Tannery from 1947 to 1972. Cattle and deer hides were treated on-site with chromium oxide and split. The less valuable halves were buried onsite. Sludge from wastewater treatment was discharged into two 3.4-acre on-site sedimentation lagoons. The Tannery operated on the site until the late 1990s. During this time, Frontier Leather also leased an onsite building to a series of lead-acid battery manufacturers from 1956 to 1972, which resulted in the removal of 743 tons of lead-contaminated soil. The site has been vacant since the Tannery closed, and the Tannery building burnt down in 2006. The site has documented police activity related to trespassing and criminal mischief (1993, 1997, 2000, 2005), arson (2005, 2013), and odor complaints (1995). Prior to about 2020 people experiencing homelessness often camped on the site and some residents have been observed using the site to exercise dogs. It is an unsecured location with frequent illegal dumping as well.

(c) Environmental Concerns, if Known, at the Site

Site contamination could impact the health of the 900-acre Tualatin River National Wildlife Refuge (TRNWR), home to hundreds of species of birds, mammals, and plants. The United States Fish and Wildlife Service (USFWS) has expressed an interest in including the eastern

half of the site as part of the Tualatin River National Wildlife Refuge (TRNWR), one of 20% of national wildlife refuges that are considered urban. The adjoining Rock Creek and associated wetlands drain to the TRNWA, which is a key stopover for migratory birds on the Pacific Flyway. Assessments identified metals in soil and sediment samples in adjacent Rock Creek, which discharges to TRNWR. Fish tissue samples show fish may be accumulating chromium and other metals from the Site, and the US Fish and Wildlife Service, which manages the NWR, has expressed concern about the Site being an attractive ecological risk to waterfowl.

(d) How the Site Became Contaminated, and to the Extent Possible Describe the Nature and Extent of the Contamination

Contamination occurred through former Tannery and battery manufacturing operations (see 6(b)) and impacts soil, sediment, and surface water. Metal concentrations are highest in the split-hide landfill at concentrations up to 32,300 mg/Kg and in the sedimentation lagoons with concentrations of chromium up to 39,677 mg/Kg. In 1994, an assessment conducted by the USFWS showed elevated concentrations of chromium were detected in fish samples collected from Rock Creek (although no direct correlation could be made). Breaches in the sedimentation lagoons pose a threat to the adjoining Rock Creek wetlands by creating a flow pathway from the sedimentation lagoons, which retain water to varying degrees, year-round, endangering Rock Creek, birds, and other wildlife. Assessments identified metals in soil and sediment samples in Rock Creek, which discharges to TRNWR. Tissue samples collected by USFWS in 1994, show fish may be accumulating chromium and other metals from the Site. Since then, the USFWS has expressed concern about the Site being an attractive ecological risk to waterfowl, as TRNWR is a key stopover for migratory birds on the Pacific Flyway. In 2018, an ecological risk assessment revealed unacceptable ecological risks in the north and south sedimentation lagoon, areas downstream of the breaches in each lagoon, areas of the Rock Creek floodplain downgradient of the lagoons and in the hide split landfill area. In an internal Memorandum dated March 19, 2002, the DEQ indicated that it believed site contamination and impacts to sensitive environments warranted state-led cleanup at the site.

7. Brownfield Site Definition

The site is not listed or proposed for listing on the National Priorities List. It is 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 it is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

Oregon Department of Environmental Quality (DEQ) performed initial assessment after adding the site to its Orphan Sites List in 2002. A Phase II Environmental Site Assessment compliant with ASTM E1903-19 was completed with support from an FY14 EPA Site-Specific Brownfields Assessment Grant. This Phase II was dated July 2016. A draft ABCA was released for public comment in 2018, and comments from DEQ and the public were incorporated in the latest version, dated July 2018 (Appendix 1). DEQ has affirmed that there is no need for additional site assessment.

9. Site Characterization

- a. Not applicable
- b. Please see attached letter.

c. Not applicable

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which a Brownfields grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The site does not require a property-specific determination in order to be eligible for funding.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. Landowner Protection from CERCLA Liability

1. Bona Fide Prospective Purchaser Liability Protection

a) Information on property acquisition

The City of Sherwood acquired the site via negotiated acquisition on November 9, 2023 and is the sole owner, holding the fee simple title. The City acquired the site from Washington County, Oregon. The City affirms it is in no way liable for contamination at the site and is not affiliated with any other person or entity potentially liable for the contamination.

b) Date of acquisition

The City conducted All Appropriate Inquiries prior to acquiring the property by conducting a Phase I Environmental Site Assessment consistent with ASTM E1527-21 standard practice, which was completed November 3, 2023. The Phase I Environmental Site Assessment was conducted specifically for the City as the potential purchaser, and was completed by WSP, an international environmental consulting firm meeting the standards for a Qualified Environmental Professional. The City took fee simple title to the property on November 9, 2023.

c) Timing and/or contribution toward hazardous substances disposal

All disposal of hazardous substances occurred prior to the City's purchase of the property. The City affirms it did not cause or contribute to any release of hazardous substances at the site, nor did it, at any time, arrange for the disposal of hazardous substances at the site or transport hazardous substances to the site.

d) Post-acquisition uses

The site has been vacant since the City acquired it.

e) Continuing obligations

- The City continues to comply with all state and local requirements. When the site was under Washington County ownership in 2020, the City removed berry bushes behind which homeless individuals were frequently observed camping, to limit potential exposure risk. As the site owner, the City plans to install fencing around the contaminated area. This will prevent the public from accessing contamination, preserve and protect the Site and associated sensitive wetlands, and will help make sure the project can start on time in the event of grant award. Estimated cost of fencing is \$25,000 over two years.

The City confirms its commitment to comply with any land use restrictions and not impeded the effectiveness or integrity of any institutional controls; assist and cooperate with those performing cleanup and provide property access; comply with all informational requests and administrative subpoenas that have or may be used in connection with the property; and provide all legally required notices.

13. Cleanup authority and Oversight Structure

- a. The City plans to enroll the site in the DEQ Voluntary Response Program and will work with DEQ to oversee cleanup at the site. The City has acquired technical expertise in the form of a Qualified Environmental Consultant and has done so in compliance with competitive procurement provisions of 2 CFR Sections 200.317-327 (see 15).
- b. Access to properties other than the site is not necessary to complete cleanup.

14. Community Notification

Sherwood provided the community an opportunity to comment on the proposed grant application and draft ABCA, in compliance with all EPA requirements. Notification was posted October 30, 2023. Please see Appendix 1 for required attachments.

15. Contractors and Named Subrecipients

On October 6, 2023, the City of Sherwood issued notice of its intent to award a contract to WSP as its consultant to provide grant writing services, to provide Qualified Environmental Professional Services if this application is funded under the current EPA Brownfields Request for Applications, and to provide additional project design and implementation services. The City chose to proceed with this method of procurement because cleanup of the former tannery will proceed in tandem with improvements to Oregon Street to complete the regional, multiuse Tonquin Ice Age Trail, which is partially funded by Metro. Selecting one consultant to perform both these tasks and support development of a grant application allows the City to harness project efficiencies and make the most of available funding.

The City's consultant was selected in compliance with fair and open competition requirements in 2 CFR Part 200, 2 CFR Part 1500, 40 CFR Part 33, and also in compliance with EPA's "Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements," as well as the EPA publication "Brownfields Grants: Guidance on Competitively Procuring a Contractor."

The City issued a Request for Proposals (RFP), which was shared in the Portland Daily Journal of Commerce, a regional publication, on both August 18 and August 21, 2023. The RFP was also posted on the City's website for over 30 days, from August 18 to September 21, 2023. Firms were broadly solicited, and two offers were received and considered. Price reasonableness for the grant implementation work was the most heavily weighted selection factor in the evaluation of proposals, although a broad array of factors were considered in evaluating proposals. The City's complete scoring criteria, listed in the RFP, was as follows:

Evaluation Factor	Maximum Points
Overall format and quality of content in the proposal document	10
Grant writing and experience seeking EPA, other special funds with success	15
Overall qualifications and experience of firm/team for project, cradle to grave	15
Qualifications and experience for environmental consulting and site cleanup services	10
Qualification and experience for land use and engineering plan services	10
Qualification and experience for construction phase and cleanup services	10
Cost factor and evaluation, understanding of the City's budget and current approach	25
References, examples of similar projects completed	5
Total Evaluation Points	100

Please see Appendix 2 for required attachments.



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

November 8, 2023

via electronic delivery

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

Re: DEQ Support – City of Sherwood Application for an EPA Brownfield Cleanup Grant

Terri:

The Oregon Department of Environmental Quality is pleased to acknowledge the Cleanup Grant Application for the City of Sherwood for the 25-acre former Frontier Leather Tannery site. The project is enrolled in the state voluntary response program (see [ECSI#2368](#)) with DEQ project management oversight. A number of site investigations including a focused feasibility study, remedial investigation, and Analysis of Brownfield Cleanup Alternatives (ABCA) have been conducted on or adjacent to the site since the 1980s. Therefore, DEQ affirms that sufficient site characterization has been performed for remedial work to begin.

Heavy metals are present in soil and sediment due to former leather tanning and battery manufacturing operations that occurred between 1947 and 1999. In 2002, DEQ issued an orphan declaration for the site to determine the extent of contamination, which was found to extend to a US Fish and Wildlife Refuge. Since then, DEQ has worked with Washington County who foreclosed on the property between 2012 and 2014, and with the City of Sherwood who plans to acquire the property in early November (prior to the EPA Cleanup grant application deadline), to discuss protective site reuse.

The proposed cleanup will allow for relocation of the City of Sherwood's public works facility, which will also serve as an emergency response facility. The cleanup will also restore approximately 4-acres of wetlands.

The EPA Cleanup grant will support the cleanup and disposal of hazardous substances that pose a risk to people and wildlife and impede site reuse. DEQ encourages EPA to fund the \$5 million Cleanup Grant application from the City of Sherwood. Please contact Kara Master, DEQ Northwest Region Brownfields Coordinator, at 503-229-5585 if you have any questions.

Sincerely,

Christine Svetkovich

Christine Svetkovich (she/her)
Northwest Region Administrator

ecc: Kara Master, DEQ NWR Brownfield Coordinator
Mark Pugh, DEQ NWR Project Manager
Rebecca Wells-Albers, DEQ HQ Brownfields Coordinator
Lorenzo Danielson, DEQ PPA Program Coordinator
Paul Seidel, DEQ NWR Cleanup Program Manager

Kevin Parrett, DEQ NWR Cleanup Program Manager
Peter Donahower, DEQ Petroleum Cleanup Section Manager
Margaret Olson, EPA R10 Project Officer
Craig Sheldon, City of Sherwood
Jason Waters, City of Sherwood
Dan Schall, WSP
John Kuiper, WSP
Jennifer Casler, Haley and Aldrich
Sarah Sieloff, Haley and Aldrich