



100 HIGH STREET S.E., Suite 200 | SALEM, OREGON 97301 | www.mwvcog.org
 T: 503.588.6177 | F: 503-588-6094 | E: mwvcog@mwvcog.org
An equal opportunity lender, provider, and employer

EPA Brownfield Assessment Grant Narrative Information Sheet

1. Applicant Identification:

Mid-Willamette Valley Council of Governments
 100 High Street, SE, Suite 200
 Salem, Oregon 97301

2. Website URL:

Mid-Willamette Valley Council of Governments: <https://www.mwvcog.org/about>
 City of Amity, Oregon: <https://www.amityoregon.gov/>
 City of Dallas, Oregon: <https://www.dallasor.gov/>
 City of Salem, Oregon: <https://www.cityofsalem.net/>
 City of Woodburn, Oregon: <https://www.woodburn-or.gov/>

3. Funding Requested:

- (a) Assessment Grant Type: Assessment Coalition
- (b) Federal Funds Requested: Requested Amount: \$1,500,000

4. Location:

- | | |
|-----------------------------------|---------------------------------|
| City of Woodburn | City of Dallas |
| (a) <u>City:</u> City of Woodburn | (a) <u>City:</u> City of Dallas |
| (b) <u>County:</u> Marion | (b) <u>County:</u> Polk |
| (c) <u>State:</u> Oregon | (c) <u>State:</u> Oregon |

5. Coalition Members' Target Areas and Priority Site Information

Coalition Member Name	Target Area	Census Tracts
Mid-Willamette Valley Council of Governments (Lead)	Cities listed below	
City of Woodburn (Non-Lead)	City of Woodburn	41047010304, 41047010305, 41047010307, 41047010308, and 41047010309
City of Amity (Non-lead)	City of Amity	41071031000
City of Salem (Non-lead)	City of Salem	41047000200-600, 41047000702-703, 41047000900 -1300, 41047001501-503,

		41047001601, 41047001603, 41047001605, 41047001607-608, 41047001701-703, 41047001801-803, 41047002001, 41047002101-102, 41047002201-202, 41047002301, 41047002303-304, 41047002400, 41047002502, 41047002701-702, 41047002800, 41053005100, 41053005203-206, 41053005301-302
City of Dallas (Non-Lead)	City of Dallas	41053020202, 41053020203, and 41053020204

6. Contacts:

(a) Program Director:

McRae Carmichael, mcarmichael@mwvcog.org
Acting Executive Director
Community & Economic Development Director
Mid-Willamette Valley Council of Governments
100 High Street SE, Suite 200
Salem OR 97302
503-540-1625

(b) Project Director:

Laura Conroy, Lconroy@mwvcog.org
Project manager, General Counsel
Community & Economic Development department
Mid-Willamette Valley Council of Governments
100 High Street SE, Suite 200
Salem OR 97302
503-540-1620

7. Population:

City of Amity, Oregon, population 1,972 (2020 Census)
City of Salem, Oregon, population 177,423 (2020 Census)
City of Woodburn, Oregon, population 26,013 (2020 Census)
City of Dallas, Oregon, population 16,854 (2020 Census)

8. Other Factors:

Other Factors	Page #
Community population is 15,000 or less.	Section 1.a.iii, City of Amity
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	--
The priority site(s) is impacted by mine-scarred land.	--

The priority site(s) is adjacent to a body of water (i.e., the border of the 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).	Section 1.a.iii, Myers Mill Site, City of Salem
The priority site(s) is in a federally designated flood plain.	Section 1.a.iii, Dallas Mill Site, City of Dallas, page 2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	--
The reuse of the priority cleanup site(s) will incorporate energy efficiency measures.	--
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	--
Other Factors	Page #
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B, for priority sites within the target areas.	Section 3b, Page 11
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	--

9. Letter from the State or Tribal Environmental Authority: DEQ letter attached.

10. Releasing Copies of Applications: No restriction on release.



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

January 21, 2026

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

RE: FY2026 EPA Assessment Coalition Grant Application for Mid-Valley Council of Governments

Dear Terri,

The Oregon Department of Environmental Quality is pleased to acknowledge the Assessment Coalition Grant Application from the Mid-Valley Council of Governments. Non-lead members are the cities of Salem, Woodburn, and Dallas. Mid-Valley Council of Governments selected four target areas in the cities of Woodburn, Dallas, Salem, and Amity. The focus site in Woodburn is the 1030 Young St property, which is a key site unlocking affordable housing and commercial reuse in an overburdened and underutilized area. The focus site in Dallas is the Dalles Mill property which was a former sawmill that operated from approximately 1906 to 2009. This assessment will support the Dallas Mill Site Redevelopment Plan, which is addressing the shortfall of commercial land and housing. The focus site in Salem is the Front Street Corridor properties along the Willamette River. This work would support the redevelopment to flexible mix use. The focus site in Amity is the Amity City Hall which the city plans to add an emergency shelter, senior center, library, and a new city hall.

Mid-Valley Council of Governments is requesting \$1.5 million in EPA Brownfields Coalition Assessment funding to assess and plan for reuse and redevelopment over the 4-year grant period. Mid-Valley Council of Governments anticipates performing 12 Phase I Environmental Site Assessments (ESAs), 12 Phase II ESA, 5 cleanup plans, and 5 reuse plans.

DEQ will support this initiative by using 128(a) State Response grant funding to assist the Mid-Valley Council of Governments Coalition with work plan development, provide technical assistance on the DEQ Cleanup process, and on-board projects. DEQ encourages EPA to fund the Coalition Assessment Grant application. 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

Brad Shultz
Western Region Cleanup Manager

ec McRae Carmichael, MCarmichael@mwvcog.org
Margaret Olson, EPA, olson.margaret@epa.gov
Rebecca Wells-Albers, HQ Brownfields Coordinator, rebecca.wells-albers@deq.oregon.gov

1. Project Area Description and Plans for Revitalization

a. Coalition Members, Overview of Brownfield Challenges and Description of Target Areas (1.a-1.b)

The Mid-Willamette Valley Council of Governments (MWVCOG), the lead member of the coalition, is a regional planning and economic development organization serving Marion (pop. 352,867; 1,194 sq. mi.), Polk (pop. 90,549; 740 sq. mi.), and Yamhill (pop. 110,866; 718 sq. mi.) Counties in Oregon. Non-lead members are the cities of **Salem** (pop. 176,666), **Woodburn** (pop. 26,845) and **Dallas** (pop. 17,214). MWVCOG members have identified four **Target Areas** (TAs): the **City of Salem** (CTs 41047000200-600, 41047000702-703, 41047000900 -1300, 41047001501-503, 41047001601, 41047001603, 41047001605, 41047001607-608, 41047001701-703, 41047001801-803, 41047002001, 41047002101-102, 41047002201-202, 41047002301, 41047002303-304, 41047002400, 41047002502, 41047002701-702, 41047002800, 41053005100, 41053005203-206, 41053005301-302), the **City of Woodburn** (CTs 41047010304-305, , and 41047010307-309), the **City of Dallas** (CTs 41053020202-203, and 41053020204), and within MWVCOG's jurisdiction, the **City of Amity** (occupying parts of CT 41071031000). All MWVCOG members need U.S. Environmental Protection Agency (EPA) resources for brownfield assessment and reuse planning because they lack resources to fund and manage these efforts that are vital to restoring economic vitality. MWVCOG requests \$1.5 million for an EPA Brownfields Assessment Coalition grant to assess and plan for reuse and redevelopment. Historically, the fertile Mid-Willamette Valley was home to many Native American tribes, including the Kalapuya people and several tribes of the Molala and Chinook people. Europeans settlers initially relied on agriculture, and much of the land, formerly occupied and stewarded by tribes, was awarded to settlers through a series of negotiations and treaties ([Lewis 2023](#)). In the 20th and 21st centuries, agricultural, industrial and manufacturing employers—including food and lumber processing—became the largest employers. Lumber processing has dwindled in recent decades due to changes in laws and the market—in 2009 the Willamette Industries timber mill closed its doors after operating for 103 years ([Polk County Itemizer-Observer 2009](#)) and Taylor Lumber and Treating ceased operations after 46 years. Another large industrial employer in the area, Tyco, shuttered operations and laid off 300 in 2007 [[Parks 2016](#)]), reducing the number of family-wage jobs available to Dallas residents. Consolidation in the agriculture sector meant job reductions for a workforce made up of Woodburn-area residents earning wages at close to the bottom of the scale ([OHS n.d.](#), [Oregon4biz n.d.](#)). These contractions have left a legacy of economic uncertainty, blight, and industrial contamination. Since the 2008 widescale job losses, the three-county region has experienced some growth; however, gross domestic product per capita is 28% lower than the state average and has grown more slowly than in the state for a decade ([Oregon4biz, n.d.](#)). Median wages in the agriculture, forestry, and manufacturing sectors lag behind the state median earnings. In the agriculture sector, wages generally range from \$25,000 to \$39,000 a year with a median of \$32,000; in forestry, from \$40,000 to \$89,000 a year with a median of \$64,500; and in manufacturing, from \$40,000 to \$88,000 a year with a median of \$64,000 with the median income in Oregon at \$85,220 (**Table 3**). In these economically depressed areas, attracting jobs, building housing, and relieving the historical burdens of the industrial past are three priorities for MWVCOG and its Coalition partners. **Salem**, the State Capital and County seat of Marion County, is located at the center of Oregon's second largest metropolitan area as and is home to nearly 30,000 jobs in the Public Sector ([ECONorthwest, 2014](#)). While Salem has historically been a site for the food and beverage manufacturing industry, the most recent Economic Opportunity Analysis indicates that there is a surplus of over 900 acres of undeveloped industrial lands and a deficit in properties suitable for traditional commercial space to support the growth in the public sector workforce expected by 2035 ([ECONorthwest, 2014](#)). In addition, the City has identified a deficit of over 200 acres for multi-family residential development to house Salem's rapidly growing population ([ECONorthwest, 2014](#)). In response to housing needs identified by the City of Salem and the State of Oregon, private property owners have begun pursuing brownfield redevelopment along Salem's Front Street corridor ([ECONorthwest, 2014](#), [Oregon Department of Administrative Services, 2025](#), [Alexander, 2024](#)). Front Street was historically a center of warehousing and specialty food manufacturing ([Alexander, 2024](#)). The area has been identified as a site of needed mixed use development, but a result of its industrial past is a commercial rail line running through the center of a city owned right of way and a multitude of semi-abandoned industrial facilities. To facilitate the redevelopment of the corridor the City of Salem has secured over \$2 million in funding to redesign and rebuild the front Street Right of Way to encourage the development of up to 370 dwelling units along the corridor ([Woodworth, 2024](#)). **Woodburn** had an estimated 11,965 jobs as of 2023 ([City of Woodburn 2024](#)). The City's focus has been on increasing jobs in materials and wood products manufacturing and food processing as well as product distribution and e-commerce ([City of Woodburn 2024](#), [ECONorthwest 2016](#)). A 2016 study identified approximately 265 acres at specific sites for the envisioned industrial and commercial uses, including a planned

Gateway District that would include mixed multifamily housing above commercial buildings ([ECONorthwest 2016](#), [City of Woodburn 2022](#)). This leaves an ongoing deficit of 264 acres for projected employment land demand under Oregon’s requirement to use available land within its urban growth boundary (UGB; Oregon Revised Statute [ORS] Chapter 197). A 2024 analysis identified the need for 529 acres of buildable land in Woodburn to support a mix of 75% industrial and 25% commercial uses that could create approximately 6,600 jobs by 2043 ([City of Woodburn 2024](#)). Oregon Department of Environmental Quality (DEQ) data show that Woodburn has 4 known leaking underground storage tank (UST) sites, and suspected environmental cleanup sites occupy more than 430 acres of land ([DEQ 2024](#)). An Amazon distribution center, opening in the city in 2025, is estimated to add 1,500 jobs, but more are needed ([Poehler 2024](#)) along with affordable housing. A 2019 Housing Needs Analysis found that 26% of renter households in Woodburn are severely rent burdened and 12% of homeowners are cost burdened—both pay more than 50% of their incomes for housing. Residential land needs are forecasted to require 333.5 acres; thus the City of Woodburn, with a 2019 rental vacancy rate of just 3%, has an unmet need for affordable housing ([City of Woodburn 2019](#)). The City’s strategy is to reuse and redevelop brownfields properties in its designated Downtown Gateway district to not only provide affordable housing but also “provide more consumers living within an area of commercial development” ([City of Woodburn 2022](#)). Currently, the primary employers in **Dallas**, the Polk County seat, are government and healthcare, employing about 1,900 people in 2018 ([City of Dallas 2024](#)). Dallas has a vision to build on its foundation of manufacturing including approving plans in 2019 to build new paper manufacturing plant that is estimated to bring 120 new jobs to the area ([ECONorthwest 2021](#), [Guzman 2019](#)). A recent economic opportunity analysis identified the potential for Dallas to add 2,440 jobs by 2041 ([ECONorthwest 2021](#)). The potential will be unrealized without suitable developable land, which is limited in Dallas’s downtown by the federally designated floodplain and floodways from the North Fork Ash Creek; an estimated nearly 28% of the industrial and manufacturing lands in the South Dallas Industrial zone are at risk of flooding ([Polk County 2024](#), [FEMA 2025](#)), which means that the city must look to redevelop its brownfields sites in order to comply with the state growth requirement of ORS 197. DEQ data show that Dallas has more than 40 leaking UST sites, and suspected environmental cleanup sites occupy more than 300 acres of land ([DEQ 2024](#)). Many of these sites are in the Dallas downtown commercial area. In addition, about 26% of households are severely rent burdened ([City of Dallas 2019](#)). **Amity**, a small city in Yamhill County, has an economy historically tied to agriculture and the growing Oregon wine industry, with public sector employment accounting for over half of its local jobs ([Mid-Willamette Valley Council of Governments, 2015](#)). The city has adequate vacant commercial and industrial land to meet projected demand through 2034, but identified a shortage of larger sites without brownfield challenges (0.5+ acres) needed to attract major employers ([Mid-Willamette Valley Council of Governments, 2015](#)). Amity’s development strategy focuses on leveraging wine-related and enhancing its central business district to support economic diversification.

c. Description of the Priority Brownfield Sites. MWVCOG has identified one priority site in each TA. In Woodburn, a 3.51-acre property at 1030 Young St. (1030 Young Street, Woodburn, OR) has undergone a Phase I environmental site assessment (ESA) which found that potential releases from the adjacent Union Oil Company (operational for 60 years) may have released contamination at the property. The ESA identified data gaps such as (1) the lack of an environmental evaluation of soil, groundwater, and/or soil gas to determine whether nearby industrial sites such as the Union Oil site and others within one-quarter mile have affected the property; (2) the presence of a heating oil tank or other fuel used for powering a steam engine; (3) a structural fire at a juice factory that occupied the site and could have released contaminants. The property is prime real estate in the Gateway area¹ of the 260-acre Woodburn Urban Renewal District, established by Ordinance 2298 in 2001) where the City needs support to plan for property reuse and redevelopment in encouraging the creation of affordable housing and commercial investments in the blighted and underutilized section of the TA ([City of Woodburn n.d.](#)). The City is investigating the site to determine its suitability as part of improvements in the Gateway area that will include mixed-use development and housing. Dallas Mill Site (1551 SE Lyle St., Dallas, OR): A former sawmill that operated from at least 1906 to 2009, the 66-acre site is bounded by residential properties in every direction, encompasses South Pacific Railroad ROWs north and south, and is contiguous with the city limits at its southern border. The site has limited transportation access, and the City is collaborating with the property owner and the Oregon Department of Transportation to improve access to and realign the North Fork Ash Creek ([City of Dallas](#)

¹ In general, the Gateway Area includes the historical downtown, Front Street to Highway 214 and Highway 214 to redevelopment sites on Stacy Allison, Young Street to Highway 99 and Highway 99 to Highway 211.

2024). Contaminants associated with the site include total petroleum hydrocarbons as diesel-, oil-, and gasoline-range organics, semivolatile and volatile organic compounds, polycyclic aromatic hydrocarbons, and phenols (Farallon 2023) impacting soil and groundwater (DEQ n.d.). In August 2024, 46.97 of the 66 acres were entered into the DEQ Voluntary Cleanup Program for contamination from sawmill operations as well as underground and aboveground storage tanks. Additional assessment will be needed for this site which is part of the Mill Site Redevelopment Project, a priority that has been recommended for redevelopment, as is described in more detail in 1.e below. Salem Front Street Corridor (3,700' section of Front Street NE between the intersection of the Front Street Bypass and South St NE): The city of Salem has identified that the industrial uses lining the front Street Corridor and the layout of the corridor itself with commercial train tracks splitting the travel lane, is unsuitable for its flexible mixed-use zoning designation and hampers redevelopment of the site. The history of the area as a site of food packing and the presence of an active rail line are indicators of contaminants such as diesel, heavy metals, oil and other unidentified byproducts of manufacturing processes. The City of Salem has begun redesigning and reconstructing front street to be a modally separated right of way with improved train crossings (Woodworth, 2024) The Corridor redesign project will require site investigations of the Front Street right of way and the surrounding abandoned packing and warehousing facilities. Amity City Hall (109 Maddox Avenue) is an aged building that has previously served as the city's fire hall. This prior use raises the potential for environmental concerns, including petroleum contamination, solvents, asbestos-containing materials, pfas, and lead-based paint. The city has identified a need for a community facility to serve multiple purposes — including an emergency shelter, senior center, library, and city hall. The current city hall site could be developed into a multi-use resilience hub for the community if the environmental concerns were identified and remediated. The city hall is adjacent to Highway 99 a major thoroughfare for industrial and commercial traffic and is part of the identified Central Business District (Mid-Willamette Valley Council of Governments, 2015). No formal environmental assessment has been conducted to date. The City needs to complete an assessment to identify potential environmental issues and, if necessary, proceed with hazardous materials removal to ensure the property is safe for continued municipal use and future development.

d. Identifying Additional Sites/ Once the priority sites in the TAs have been addressed, the Coalition will use a process similar to the one employed for choosing the priority sites for this application: (1) update the data drawn from the DEQ inventory of priority sites and refresh the data for each TA in the MWVCOG Brownfield Inventory created in 2024 to support this application. (2) Using city planning documents, Coalition and community partner knowledge of development activities and needs, input from the Brownfields Advisory Committee (BAC), and ongoing project and program reports and updates, the Coalition will select additional sites. Criteria for selection of additional sites include: (a) fit of the potential assessment and planning scope with the remaining available budget; (b) proximity of the property to areas of greatest need, existing priority development activities, opportunities for synergy with other redevelopment (such as providing acreage for expanding the number of affordable housing units developed); and (c) the surrounding land uses and limitations.

e. Reuse Strategy and Alignment with Revitalization Plans. Each of the TA cities has invested effort and resources in analyses, engagement, and actions to improve livability and economic vitality for their communities (Table 1). Woodburn's strategy for its UR District includes revitalizing its commercial downtown area and developing a diversity of much-needed rental and owner-occupied new and rehabilitated housing units in mixed-income neighborhoods (URA 2024). The urban renewal plan includes medium- and high-density development, code changes to allow for higher-density development where services, transit, and parking exist or are planned. The City's Urban Renewal Agency is continuing with a due diligence process for the 1030 Young St. property in the UR District to support this goal (City of Woodburn 2024). The City's budget mentions line items dedicated to clean transit and transportation development as well as grants to provide area business with matching funding to improve buildings, façades, and sidewalks (City of Woodburn 2024). Dallas has an estimated shortfall of 94 acres of commercial land within the existing UGB. A 2019 Housing Needs Analysis noted the need for medium- and high-density housing, especially affordable housing (City of Dallas 2019). Goals for the Dallas Mill Site Redevelopment Project include addressing the shortfall of commercial land and the need for housing (City of Dallas n.d.). The City's budget includes (1) urban renewal funds to develop the former mill site, (2) projects in the nearby La Creole Node area to provide a sanitary sewer system to prepare the site for mixed-use development including medium- and high-density housing, and (3) multiple programs and projects to improve or replace decades-old infrastructure to address current needs, climate resilience, and statutory and code requirements (City of Dallas 2024). Salem has an estimated surplus of over 900 acres of industrial land, a deficit of more than 200 acres of commercial land (primarily needed for additional professional offices and small commercial businesses), and a deficit of more than

200 acres of land suitable for multi-family housing ([ECONorthwest, 2014](#), [ECONorthwest, 2014](#)). As a result of the identified housing need, the city has considered establishing a new urban renewal area (URA) for the north waterfront which would include the formerly industrial Front St. Corridor ([ECONorthwest, 2025](#)). While the city of Salem has not yet determined the scope of a new URA the 2025 Housing Needs Analysis indicates that alongside the creation of a walkable commercial riverfront district centered on front street a waterfront URA could support the development of up to 500 dwelling units ([ECONorthwest, 2025](#)). Prior to instituting a URA, Salem has secured over \$2 million in funding to redesign the Front St right of way ([Woodworth, 2024](#)). Amity’s economic development strategy focuses on revitalizing its historic central business district (CBD) to promote the growth of jobs in the tourism and hospitality sector, leveraging the regions reputation for wine production ([Mid-Willamette Valley Council of Governments, 2015](#)). While Amity has a surplus of developable commercial, industrial, and residential land several redevelop able or City owned lots have prior uses which could lead to environmental contaminants hamstringing redevelopment ([Mid-Willamette Valley Council of Governments, 2015](#), [City of Amity, 2015](#)). To support redevelopment in the historic CBD the City has begun upgrading infrastructure in the downtown area, including upsizing to 10” water mains to support larger commercial water users ([City of Amity, 2025](#)).

Table 1. Plans, Studies, and Budgets Supporting Revitalization and Reuse Strategies and Actions

Entity/Priority Site	Plans and Strategies Supporting Reuse	Land Use Plans and Studies
Woodburn/1030 Young St.	2010 Woodburn Downtown Development Plan . Item E4 describes the need to develop features to attract visitors to the Gateway Project. Item E7 describes the steps to develop higher-density affordable and mixed-income housing, and a housing analysis sets a goal to capture between 388 and 1,163 new households in the Gateway area by 2029. 2024 Woodburn Urban Renewal Plan details projects and priorities for improvements.	2024 Economic Opportunities Analysis, 2019 Housing Needs Analysis, 2016 Target Industry Analysis, 2024 Comprehensive Plan, 2024 Parks and Recreation Master Plan
Dallas/Dallas Mill Site	2023 Strategic Plan . Goal 12 action: Better promote and utilize Enterprise Zone tax abatement program by authorizing a minimum of one business per year. Goal 16: Prepare the former mill site for redevelopment. Goal 23: Address residential land supply deficiencies identified in the City’s Housing Needs Analysis. Actions: a. Add at least 2 acres of medium density land to the City’s inventory each fiscal year until the 10.6 acre deficit is fulfilled. b. Add a minimum of 0.8 acres of high density residential land to the City’s inventory by the end of FY 2024. Goal 40: Undertake improvement projects identified in the Stormwater Master Plan and North Fork Ash Creek Flood Mitigation Study. Actions: a. Develop a strategy for implementation of North Fork Ash Creek flood mitigation projects by end of FY 2024.	2021 Economic Opportunities Analysis, 2019 Housing Needs Analysis, 2021 Comprehensive Plan
Salem/Front St. Corridor	2023 Salem Transportation System Plan . Street improvement 66: Reconstruct Front Street NE to modified Arterial standards and realign the railroad tracks down the center. Construct wide travel lanes as well as curbs, gutters, and sidewalks. The project includes the reconstruction of Mill Creek Bridge.	2014 Housing Needs Analysis, 2014 Economic Opportunities Analysis, 2021 Strategic Plan, 2025 Housing Production Strategy
Amity/Amity City Hall	2015 Economic Opportunities Analysis . Recommendation 3: Retain and consolidate Amity’s larger commercial and industrial sites, which are needed to both attract new employers and allow existing small businesses to expand in the future.	2015 Comprehensive Plan

f. Outcomes and Benefits of Reuse Strategy.

For each of the TA cities, the anticipated outcomes and benefits of the reuse strategies are tied to increasing available land for commercial and housing development, helping to improve resiliency of natural systems from the effects of climate change, and ultimately improving the economies of each TA. The projects proposed will not cause the displacement of residents or businesses. The Assessment grant will support the following benefits: reuse of some of the nearly 900 acres of suspected or confirmed environmental sites across all TAs, mitigate contamination to health indicators such as exposure to USTs and particulate matter, and create opportunities for economic development, job creation, and much-needed housing for the communities in all three TAs.

g. Resources Needed for Site Reuse. MWVCOG and its TA cities are eligible for funding from a variety of sources. The TA cities have been actively pursuing funding from local, state, county, and federal resources that can be leveraged to enhance and extend the \$1.2 million Brownfields Assessment funding (**Table 2**).

Name of Resource	Secured or Unsecured	Additional Details or Information
Business Oregon Brownfields Cleanup Fund	Unsecured	Direct loans and grant financing to assist property owners to conduct environmental actions and assessment through cleanup on brownfields. Assistance to rural and economically distressed communities is prioritized.
Business Oregon Brownfields Redevelopment Fund	Unsecured	Low-interest loans and grant financing for properties impacted by the existence of hazardous substances and for which cleanup is necessary for development or redevelopment to occur. Assistance to rural and economically distressed communities is prioritized.
Oregon Department of Environmental Quality Brownfields Grant Program	Secured 2023	\$60,000 for on-site remediation of any found contamination at the property at 791 Main Street during property redevelopment for the City of Dallas.
Oregon Revised Statute Chapter 307	N/A	Allows a local government to create a tax incentive program for property owners with confirmed brownfields properties.
EPA Targeted Brownfield Assessment Grant Program	Unsecured	Assessment assistance that uses contractors paid by EPA for assessments to minimize uncertainties at brownfields. EPA states that the average dollar value of TBAs is \$100,000.
EPA Multipurpose Grant Program	Unsecured	Assistance of up to \$1,000,000 for further investigation (Phase II ESA), cleanup, or revitalization that involves reuse for applicants that have drawn down current Assessment grant funding.
EPA Cleanup Grant Program	Unsecured	Assistance of up to \$4,000,000 to clean up and sustainably reuse brownfield sites. For applicants that have drawn down their current Assessment grant funding.

h. Use of Existing Infrastructure

The TAs have existing infrastructure (e.g. roads and highways; utilities; water, sewer, and stormwater systems, structures) that will be used to support reuse and redevelopment at the priority sites.

2. Community Need and Community Engagement

a. The Community’s Need for Funding. The TAs have different economic challenges, but persistent poverty and inconsistent employment is common to all. Residents in Woodburn, Amity, and Dallas are more likely to be living below the poverty level and residents in in Woodburn, Salem, and Dallas are unemployed at high rates (Table 3). Incomes in Woodburn and Dallas must be stretched to cover rising housing costs; two studies found that 26% of renter households in Woodburn and in Dallas are severely rent burdened, spending more than 50% of their monthly income on rent ([City of Woodburn 2019](#), [City of Dallas 2019](#)).

Indicator	Woodburn	Dallas	Salem	Amity	Oregon	U.S.
2020 Population	26,013	16,854	175,535	1,757	4.2 M	331.4M
% Population Change 2010–2020	7	13	13	9	11	7
2023 Median Household Income	\$67,469	\$65,647	\$79,638	\$93,438	\$85,220	\$81,604
% Below Poverty Level 2023	15	17	12	15	12	12
Unemployment Rate 2023	5	5.8	6.4	3.7	4.9	4.6

Sources: [U.S. Census Bureau](#) and [American Community Survey](#) data.

Lower income levels combined with proximity to sources of pollution compromise the health and well-being of the people who live there. Asthma, while common throughout the Mid-Willamette Valley is particularly common in Dallas (**Table 5**). Throughout the TA’s poverty and unemployment exacerbate the plight of people who may have no choice but to live near USTs or facilities that handle hazardous waste. Brownfield redevelopment in the TA’s directly tackles the crises of unemployment and housing availability by creating jobs through the clean-up process and new commercial development, while transforming blighted, centrally located land into sites for housing.

b. Health or Welfare of Sensitive Populations; and, c. Greater Than Normal Incidence of Disease and Adverse Health Conditions. Sensitive populations in the TAs include: a large population of the elderly as well as a large percentage of young people living in poverty in Dallas, a large population of children and teenagers in Amity and Woodburn, and a large population of women of reproductive age in Salem and Amity (Table 4). The TAs all are affected by incidence of disease which can be associated with poor air quality or the presence of airborne pollutants. The crude prevalence of Asthma in the Mid-Willamette valley is greater than the prevalence of asthma in the state of Oregon and the US, in addition the rate of lung and throat cancer in Yamhill, Polk, and Marion Counties is much greater than the state Mean (Tables 5 and 6). Polk and Marion Counties, home to Dallas, Salem, and Woodburn, also have much higher than average rates of hospitalization for chronic obstructive pulmonary disease (COPD), air pollution which often results from the presence of industrial sites, has been closely linked to rates of COPD (Table 6, [Duan, Hao, and Yang, 2020](#)). The people who can least afford illness, especially chronic illnesses like asthma and COPD, are likely suffering from their proximity to sources of contamination. The lack of market rate and below market rate housing not only burdens residents financially but may force some into housing that is closer to sources of contamination ([Hood 2005](#)). Residents in the cities of Woodburn and Dallas suffer the double disadvantages of greater proximities to sources of contamination such as leaking USTs and facilities that must file risk management plans for the hazardous materials handled in them.

2023 Indicator	Woodburn	Dallas	Salem	Amity	Oregon	U.S.
% Age 65 and over	17.2	22.8	15.8	7.6	19.6	17.7
% Age under 18	25.1	20.4	21.4	24.9	19.6	21.7
% Age under 5	5.9	6	5.2	7.1	4.7	5.5
% Age under 18 below poverty	22.1	19.8	17.2	22.9	13.3	16.3
% Females 15–44 years	18.7	18.8	20.6	26.1	19.8	19.7
% with a Disability	15.2	19.8	15.4	17.7	15.1	13

Notes
Shading indicates Target Area percentages that are higher than Oregon or U.S. and could be outside the margin of error.

Indicator	Woodburn	Dallas	Salem	Amity	Oregon	U.S.
Asthma Crude Prevalence ^[1]	11.6	12.9	12.4	12.5	11.2	10.8

[1] Per Center for Disease Control

Indicator	Yamhill	Polk	Marion	Oregon
Lung and Bronchus Cancers ^[1] Rate per 100,000 population between 2014-2018	57.3	54.4	59.4	52.5
Very Low Birthweight ^[1] Percent of live births under 1,500 grams between 2014-2018	0.8	0.8	0.9	0.7
COPD Hospitalizations ^[1] Rate per 10,000 population 25 and older, 2021	5.8	9.0	9.9	6.4

[1] Per Oregon Health Authority

Critical service gaps documented for the TAs include risks of flooding in Dallas and Salem, as well as gaps in broad band services in Woodburn, lack of access to transportation in all areas, and food deserts (areas where more than 1/3rd of the population must travel 0.5 miles or more to a supermarket) in Woodburn, Salem, Dallas ([FEMA, 2025](#), [FCC, 2025](#), [USDA, 2025](#)). In addition to the established benefits to the struggling economies in the TAs, assessment funding will help alleviate the burdens for sensitive populations and others struggling in the TAs by supporting the communities’ efforts to leverage the industrial legacies of yesterday into revitalized properties.

d. Economically Impoverished/Disproportionately Impacted Populations. TA residents, particularly those in Woodburn and Salem, are at risk for environmental consequences at far higher rates than others in the state due to exposure to a high number of a leaking USTs ([Loew, 2025](#)). Decades of deferred investments have created environmental consequences that negatively impact health and economic opportunities, leading to poor health outcomes, a cycle of poverty, and blighted landscapes in the TAs. Funding to assess brownfields in these communities would support local efforts to protect human health and reduce environmental injustices, provide employment and housing in communities with high concentrations of poverty, and increase local tax bases critical to funding future efforts (Table 3). Redeveloping brownfields in these four TAs with high rates of youth and adults in poverty aims to break the cycle of poor health outcomes linked to industrial uses, such as the elevated asthma

rates and prevalence of extremely low birthweights noted in the region by mitigating future contamination and transforming underutilized land into assets (Tables 5 and 6). All four TAs contain a greater number of children per capita than is typical in the state of Oregon, and Woodburn and Amity in particular have a greater percentage of persons under 18 than the national average (Table 4). Children are disproportionately affected by airborne pollutants ([Children’s Environmental Health Collaborative, 2025](#)). Air pollutants from active industrial sites are often trapped in the Willamette Valley by temperature inversions or “stagnant air” while pollutants in the soil surrounding brownfields sites can be introduced into the air via wind and dust storms, which occur during periods without rain in the Willamette Valley ([Cozart, 2020](#)). The remediation and re-use of identified brownfields sites will reduce the amount of airborne pollutants, including PM 2.5, in the CTs which contain brownfields. As children are disproportionately represented in the TAs and are disproportionately affected by airborne pollutants, the re-use strategy will identify and reduce the impacts on a key sensitive population within the TAs.

Community Engagement

e.–f. Project Involvement and Project Roles (2.e through 2.f)

Throughout the grant, non-lead Coalition members will work with MWVCOG to coordinate the participation of community and civic groups in their TAs with respect to assessment needs and remediation and reuse decision-making. The community partners listed in **Table 7** will provide advice to MWVCOG on community needs and MWVCOG will share updates on project progress with them. MWVCOG and partners will provide stipends to cover for time, loss of wages (as attendees may need to skip work), and other costs associated with meeting attendance including transportation and childcare.

Table 7. Project Involvement and Project Roles

Entity Name	Point of Contact	Mission	Specific Project Role or Assistance Provided
Business Oregon	Arthur Chaput arthur.chaput@biz.oregon.gov	Business Oregon invests in Oregon businesses, communities, and people to promote a globally competitive.	Advise Coalition members on community needs related to poverty and housing, share project updates with the public in the region.
SEDCOR	Erik Andersson President, erik.andersson@sedcor.com	We find, create and cultivate economic opportunities in Oregon’s Willamette Valley.	Leverage its network of business organizations to advertise community meetings and provide project updates and progress via website, newsletters, and social media for the region. Assist with property owner outreach.
Salem, Woodburn, and Dallas Chambers of Commerce	Salem: Tom Hoffertt, CEO Woodburn: Jen Cantu, President Dallas: Sam Dufner, President	Salem: We help business people in our community innovate, grow and make the Salem area a great place to live. Woodburn: To make the Woodburn Area a great place to live <i>and</i> work. Dallas: Improving our community one business at a time.	Leverage networks to advertise community meetings, provide connections to property owners, and communicate project updates and progress via website, newsletters, and social media. Provide assistance with property owner outreach. Generate support for projects through events.
MWVCA	Jimmy Jones Executive Director, jimmy.jones@mwvca.org	Empowering people to change their lives and exit poverty by providing vital services and community leadership.	Advise Coalition members on community needs related to poverty and housing, share project updates with the public in the region.
Willamette Workforce Partnership	Kim Parker-Llerenas Executive Director, kparker-llerenas@willwp.org	Through collaboration, training and outreach, Willamette Workforce Partnership efficiently drives results that lead to a skilled workforce, successful employers and thriving communities.	Advise Coalition members on community needs related to poverty and housing, share project updates with the public in the region.
PolkC Economic Devel.	Brent DeMo, Director demoe.brent@co.polk.or.us	All people are empowered and healthy.	Advise Coalition members on community needs and share project updates with the public in Polk County.
Evolve Workforce &	Maria Elena Guerra, Executive Director, mariaguerra@fhdc.org	To improve communities historically oppressed by housing and labor industries through	Advise Coalition members on housing and workforce needs in the community; provide connections to, and the most effective ways to

Table 7. Project Involvement and Project Roles

Entity Name	Point of Contact	Mission	Specific Project Role or Assistance Provided
Multifamily Housing Services		culturally specific workforce development and community-centered affordable housing management services.	communicate with, members of vulnerable communities such as Spanish-speaking households. Share project updates with members and the public.
CAPACES/ Alianza Poder	Jaime Arredondo, Executive Director, jaime@capacesleadership.org	The Capaces Leadership Institute strengthens the wellness, capacity, and political consciousness of individuals, organizations, movements, and community to eliminate social disparities.	Provide connections to the Coalition on affordable housing and youth needs. Share project updates with members and the public.
Provoking Hope	Diane Reynolds Founder/President diane@provokinghope.com	Providing a clean and sober team and environment to transition peers onto the path for successful recovery.	Advise Coalition members on community needs related to poverty, housing, and community health; share project updates with the public in the region.

g. Incorporating Community Input. Project goal is to inform meaningful community participation in grant implementation by helping the community understand its role in brownfields reuse, responding to information needs, engaging communities, especially vulnerable and underserved communities, and incorporating their input around site prioritization and planning for cleanup and reuse. MWVCOG will designate **McRae Carmichael, Community and Economic Development Director**, as the point of contact, and the Coalition will form a Brownfields Advisory Committee (BAC) consisting of representatives from project partners (Table 7). The BAC will meet quarterly with in-person and virtual options and will assist in developing a written public involvement plan (PIP), using the priority sites described here and a brownfield inventory for each TA to give input on site prioritization, provide feedback on next steps at priority sites, and assist with property owner outreach. Coalition members will hold monthly project management meetings and share update materials with members for their own leadership updates. Coalition members will conduct meetings with 20 owners of identified potential brownfield sites to educate them about this grant. The Coalition will also convene 8 community open houses over the course of the grant, each with a focus on different aspects of community education and engagement. Community open houses will be advertised via radio stations such as Spanish-language KWBY and KWIP in Woodburn and Dallas; the *Woodburn Independent*, the *Polk County Itemizer-Observer* for Dallas, and ; and at food bank, library, senior center, community center, chamber of commerce, and City venues such as list serves, newsletters, bulletin boards, and websites. MWVCOG will collect attendance information and record all public comments at each BAC and community open house. Input received at meetings and via other channels will be compiled, reviewed, and incorporated into decision-making. Subsequent communications will note responses to community feedback. MWVCOG will communicate project progress to Coalition members and project partners and will share public updates at least quarterly via its website, social media, and e-newsletter; will encourage members and project partners to share through their own channels; and will provide stipends to assist partners with the expense of translating materials into Spanish and providing interpretation at meetings. MWVCOG will also work with members and project partners to organize quarterly presentations to social and professional organizations and meet with neighbors near priority sites.

3. Task Descriptions, Cost Estimates, and Measuring Progress

a–d. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, Outputs (3.a - 3.d)

Table 8. Tasks and Activities

Task 1 – Programmatic Support

- i. **Implementation:** Procurement of QEP and other contractors in compliance with all federal and state procurement standards. Monthly Coalition coordination meetings. Programmatic performance and financial reporting (quarterly reports [QR], final closeout report, ACRES updates, annual DBE and financial reports, etc.). 4 Coalition representatives will attend up to 2 national brownfields conferences and up to 4 regional/state conferences.
- ii. **Anticipated Project Schedule:** QEP procurement will take place after the notice of grant award; grant funding is expected to become available in 2026; remaining work will take place October 1, 2025–September 30, 2030.
- iii. **Task/Activity Lead:** MWVCOG with support from Coalition partners; QEP may assist with reporting at MWVCOG direction.

Table 8. Tasks and Activities

- iv. **Outputs:** Procure QEP, 16 QRs, closeout report, ACRES updates, 4 annual DBE/financial reports, up to 48 monthly Coalition coordination meetings, 2 national conferences and 4 regional conferences attended with up to 4 Coalition representatives participating at each.

Task 2 – Community Engagement and Outreach

- i. **Implementation:** Prepare public involvement plan (PIP). Prepare informational materials about priority and other sites and update as new milestones are reached, prepare site nomination form. Host a project webpage with updates, informational materials, meeting dates/minutes, site inventory, and a comments/question section that will be responded to as appropriate. Translate materials as necessary. Convene the Brownfields Advisory Committee (BAC) to meet quarterly, guide grant activities, disseminate outreach materials, serve as brownfield ambassadors, and provide input on key milestones and site prioritization. Hold up to 8 community open houses at accessible hours with a virtual option for maximum participation. Conduct direct outreach to, and educational activities with, residents, businesses, community leaders, community groups near priority sites via phone, social media, email, handouts, and mail throughout the grant period. Hold up to 16 engagement meetings with owners of potential priority properties. Provide up to 8 educational presentations to social and professional organizations. MWVCOG will update its board every 4 months and share materials so that non-lead members can update their leadership. Tabulate public input, review and incorporate into decision-making, and publish on project website. Update existing site inventory quarterly. Participant support costs (PSCs) of \$10,000 include stipends to cover for time, loss of wages (as attendees may need to skip work), and other costs associated with meeting attendance including transportation and childcare.
- ii. **Anticipated Project Schedule:** Set up October 1, 2026–March 31, 2027, then ongoing until September 30, 2030(end of grant period).
- iii. **Task/Activity Lead:** MWVCOG and Coalition members with assistance from QEP. Coalition members will update their leadership and assist with public outreach, community open houses, property owner meetings, and presentations to social and professional organizations. Project partners will assist with public outreach, community open houses, contacting owners of potential brownfields identified in inventory, and outreach to civic organizations.
- iv. **Outputs:** 1 PIP; site nomination form, fact sheets and informational materials about priority and other sites (digital and print). Project webpage; up to 16 BAC meetings; up to 8 community open houses, outreach materials and notes; up to 16 property owner meetings; up to 8 presentations to civic organizations; up to 12 MWVCOG board updates and related materials for non-lead member use. Quarterly inventory updates, up to 17 site eligibility forms.

Task 3 – Environmental Site Assessments

- i. **Implementation:** QEP prepares QAPP, site eligibility forms and access agreements for private property. QEP completes up to 17 Phase I ESAs consistent with All Appropriate Inquiries Final Rule and latest ASTM standards and up to 12 Phase II ESAs, prioritized based on Phase I ESAs and public input. QEP prepares asbestos/hazardous materials assessments for buildings on sites, and SAP and HASP for each Phase II ESA. QAPP and site-specific plans will be reviewed and approved by EPA prior to sampling, as will ESA and Section 106 consultations.
- ii. **Anticipated Project Schedule:** Prepare QAPP October 1, 2026–March 31, 2027. Phase I ESAs completed April 2027 August 2030, with Phase II ESAs scheduled as Phase I ESAs are completed, with public input incorporated.
- iii. **Task/Activity Lead:** QEP with MWVCOG and Coalition partner support and technical support from EPA/DEQ. Where applicable, EPA to review to ensure technical and QAQC consistency.
- iv. **Outputs:** QAPP; up to 17 Phase I ESAs; up to 12 Phase II ESAs with SAP, HASP, and Endangered Species Act Compliance, Section 106 and ESA consultations, and building assessments as needed.

Task 4 – Cleanup and Reuse Planning

- i. **Implementation:** QEP prepares Analysis of Brownfield Cleanup Alternatives (ABCAs) and cleanup plans for the 3 priority sites and up to 2 additional sites. ABCAs will comply with EPA guidance and evaluate green remediation options. Cleanup plans will evaluate cleanup alternatives and costs, determine remediation/reuse planning to reduce health/environmental risks, and position site for preferred remedy identified in ABCA. QEP coordinates review of cleanup plans and risk-based cleanup options with DEQ. Solicit public comment at community open houses and tabulate, review, and incorporate into decision-making process. Conduct reuse visioning for up to 5 sites. Prepare reuse plans for up to 5 sites, with market assessment, physical site plan, and implementation strategy for funding/risk management.
- ii. **Anticipated Project Schedule:** October 1, 2026–September 1, 2030.
- iii. **Task/Activity Lead:** QEP with assistance from MWVCOG and partners. EPA and DEQ to provide guidance.
- iv. **Outputs:** 5 ABCAs, 5 cleanup plans, 5 reuse vision processes, 5 site reuse plans (3 priority sites & up to 2 more sites).

Notes	Ecology = Washington State Department of Ecology.	PSC = participant support cost.
ABCA = analysis of brownfield cleanup alternatives.	ESA = environmental site assessment.	QAPP = quality assurance project plan.
BAC = Brownfields Advisory Committee.	HASP = health and safety plan.	QEP = qualified environmental professional.
DBE = disadvantaged business enterprise.	PIP = public involvement plan.	SAP = sampling and analysis plan.

ii. e. Cost Estimates

iii. Tables 9 and 10 show the breakdown of estimated costs by task. MWVCOG Personnel and Fringe Benefits costs are \$254/hour (60% personnel [\$152/hr], 40% fringe [\$98/hr]). The average rate for QEP services is \$190/hr. As outlined under Tasks 3 and 4, over 60% of grant funds (more than \$720,000 for QEP services in Task 3 and Task 4) will support site-specific work, including Phase I/II ESAs and site-specific cleanup planning. In addition, 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities (\$360,000 for QEP services in Task 4) for priority sites in the TAs.

Table 9. Development of Cost Estimates

Task	Cost Basis and Assumptions
------	----------------------------

1. Programmatic Support

Personnel and Fringe Costs: \$49,784 (\$29,870 personnel + \$40,580 fringe benefits). 48 monthly coordination meetings = \$24,384 (48 hrs [2 hr/mtg] × \$254/hr); programmatic performance and financial reporting = \$25,400 (100 hrs × \$254/hr).

Travel Costs: \$32,480. Travel for 4 Coalition representatives to 2 National Brownfields Training Conferences: \$16,000 (\$1,500 [airfare, lodging, food, transportation] × 4 attendees × 2 conferences). Travel for 4 Coalition representatives to 4 regional/state brownfields conferences: \$16,480 (\$1030 [lodging, food, transportation] × 4 attendees × 4 conferences).

Contractual Costs: \$43,320 48 monthly coordination meetings with prep and follow-up = \$36,480 (96 hrs [2 hr/mtg] × \$190/hr); quarterly, annual, and final summary reporting = \$6,840 (36 hrs x \$190/hr).

Indirect Costs: \$75,000. Administrative costs; 5% of total EPA-requested funds.

2. Community Engagement and Outreach

Personnel and Fringe Cost: \$50,700 (\$30,420 personnel + \$20,280 fringe benefits). Up to 8 educational meetings with social and professional organizations = \$6,096 (24 hrs × \$254/hr); 8 community open houses = \$8, 128(32 hrs × \$254/hr); direct community outreach = \$40,640 (160 hrs × \$254/hr); 16 BAC meetings = \$6,096 (24 hrs × \$254/hr); website development and maintenance = \$5,080 (20 hrs x \$254/hr).

Supplies Cost: \$1,990. Direct costs (printing and mailing) for up to 8 community open houses, 8 educational meetings with social and professional organizations, and 16 BAC meetings. \$1,990 (32 meetings × \$62.20/meeting).

Contractual Costs: \$49,350. Prepare PIP and project fact sheets = \$7,600 (40 hrs × \$190/hr); direct community engagement and outreach = \$20,900 (110 hrs × \$190/hr); up to 8 educational meetings with social and professional organizations = \$4,560 (24 hrs × 190/hr); 8 community open houses = \$6,080 (32 hrs × \$190/hr); 16 BAC meetings = \$4,560 (24 hrs × \$190/hr); site prioritization and inventory update \$7,600 = (40 hrs × \$190/hr); property owner engagement, including meeting with up to 16 owners of potential brownfields identified in inventory = \$6,080 (32 hrs × \$190/hr); foreign language translation and interpretation = \$4,180 (22 hrs × \$190/hr).

Other (PSCs): \$15,000. This includes \$12,500 in stipends to cover for time, loss of wages (as attendees may need to skip work), and other costs associated with meeting attendance including transportation, and \$2,500 (25 hrs @ \$100/hr) for a dedicated childcare provider for residents attending community meetings which are usually after-hours. MWVCOG will obtain prior approval from EPA before paying out PSCs and will track disbursements.

3. Environmental Site Assessments

Contractual Costs: \$654,000. Prepare programmatic QAPP = \$7600 (40hrs × \$190/hr); prepare Phase I ESAs = \$150000 (20× \$7600); prepare 14 Phase II ESAs with federal cross-cutting reviews (HASp, SAP, Endangered Species Act, and Section 106 consultations) = \$504,000 (14 × \$36,000). Costs for ESAs will vary depending on the history, complexity, and pollutants of each brownfield site; these estimates are based on similar work in the region, but actual costs may vary as a QEP will need to be selected.

4. Cleanup and Reuse Planning

Personnel and Fringe Costs: \$25,400 (\$15,240 personnel + \$10,160 fringe benefits). Facilitate reuse visioning exercises for 5 sites = \$25,400 (100 hrs × \$254/hr).

Contractual Costs: \$456,000. Reuse visioning for up to 5 sites = \$114,000 (600 hrs × \$190/hr); prepare 5 ABCA reports = \$114,000 (600 hrs x \$190/hr); prepare 5 cleanup plans = \$114,000 (600 hrs x \$190/hr); prepare 5 reuse/area-wide plans = \$114,000 (600 hrs x \$190/hr).

Notes	EPA = U.S. Environmental Protection Agency.	PSC = participant support cost.
BAC = Brownfields Advisory Committee.	ESA = environmental site assessment.	QAPP = quality assurance project plan.
PIP = public involvement plan.	hr = hour.	QEP = qualified environmental professional.

iv.

Table 10. Project Budget					
Project Tasks	1. Programmatic Support	2. Community Engagement and Outreach	3. Environmental Site Assessments	4. Cleanup and Reuse Planning	Total
Direct Costs					
Personnel	\$49,870	\$30,420	—	\$15,240	\$95,530
Fringe Benefits	\$40,580	\$20,280	—	\$10,160	\$71,020
Travel	\$32,470	—	—	—	\$32,470
Supplies	—	\$1,100	—	—	\$1,100
Contractual	\$43,320	\$61,560	\$654,000	\$456,000	\$1,214,880
Other (PSCs)	—	\$10,000	—	—	\$10,000
Total Direct Costs	\$166,240	\$123,250	\$654,000	\$481,400	\$1,425,000
Total Indirect Costs	\$75,000	—	—	—	\$75,000
Total Budget	\$241,240	\$123,250	\$654,000	\$481,400	\$1,500,000

Note — = no costs in category.

f. Plan to Measure and Evaluate Environmental Progress and Results

MWVCOG will prepare an Excel Gantt chart with a detailed schedule of milestones, such as contracting a QEP, establishing the BAC (see 2.b.iii), holding community open houses and educational meetings with social and professional organizations, providing inventory updates, and site prioritization. MWVCOG and Coalition members will measure project results on a quarterly basis, in coordination with EPA progress reports. Measurable outcomes will include: # of properties assessed; # of properties that can be marketed with information about the presence or absence of contamination; # of properties readied for reuse; # of acres of new/renovated commercial, industrial, mixed-use, and residential space; # of property title transfers that are facilitated; # of jobs created or retained; and amount of funding and private investment leveraged. Tracking will also include increased tax revenue and property values, the value of active transportation improvements, and the number of affordable housing units permitted. MWVCOG and Coalition members will work with the BAC to prioritize projects and funding. Results will be reported in ACRES and the close-out report. Post-grant, MWVCOG will continue to update its brownfield inventory and post progress reports on its website for one year after the grant period.

4. Programmatic Capability and Past Performance

a - c. Organizational Capacity and Structure, Description of Key Staff (4.a - 4.c)

As the lead coalition partner, MWVCOG has the staff resources to ensure timely completion of all programmatic, administrative, and financial requirements of this grant. COG will use its significant in-house grant management and economic development skills to manage the Coalition while building the capacity of non-lead members to promote brownfield reuse. Upon award, COG will execute MOUs with the Coalition members, documenting roles and responsibilities and specifying grant funds use to conduct assessments at a minimum of two priority sites within each member’s jurisdiction. COG will use a collective governance that includes facilitating monthly meetings with all Coalition members to ensure each community is meaningfully involved in all aspects of the project and that clear objectives are established for successful expenditure of funds. The BAC (see 2.b.iii) will include each Coalition member and project partners, and will guide site prioritization and assist with stakeholder outreach. Roles/responsibilities of MWVCOG staff include: **McRae Carmichael** Interim Executive Director and Community and Economic Development Director will serve as project director. She brings over 25 years of public administration experience including; convening and facilitating a regional water planning coalition of 7 cities and Yamhill County creating a pathway to a regional system for water supply, treatment and distribution funded by HIIP 2501 \$250,000 Business Oregon grant; overseeing COG’s \$1.3M revolving loan fund business lending program, spearheading the process to update the region’s Comprehensive Economic Development Strategy (CEDS). She will manage program implementation, coordinate with the QEP, lead Coalition communications with EPA, and facilitate communication among Coalition members and be assisted by staff members, John Schmidt and Laura Conroy. **John Schmidt**, Grants Specialist has over 23 years managing multi-million dollar HUD, USDA, and EDA grant funded projects. He is currently managing over \$70M in federal and state grants across five cities; Willamina, Falls City, Independence, Aumsville, and Molalla, for all phases of the project; design, engineering, environmental, wage monitoring and labor reporting. He also manages the Housing Rehabilitation Lending program for Marion County. **Laura Conroy**, JD Project Manager and General Counsel brings 20+ years in public and nonprofit administration. She is actively managing P22009 a \$1.3M HUD CDBG sewer grant for the City of Sheridan, B-24-CPF-1829 FY24 a \$750k CDF HUD grant for

Ella Curran Food Bank and a \$60k phase I and phase II Brownfields Assessment grant for the City of Aurora.

Theresa Whisenhunt, senior accountant at COG, will assist with financial management, accounting and reimbursements. Theresa has over 20 years' accounting experience managing grants, grant accounting, and conducting compliance audits. She will be assisted and supported by a contract accountant with over 40+ years of grants management and local government accounting.

d. Acquiring Additional Resources. MWVCOG will procure additional resources as needed to successfully complete the project, following competitive qualifications-based procurement rules in compliance with EPA's best practice guide, local and federal requirements (2 CFR 200 and 2CFR Part 1500), as well as MWVCOG's internal procurement policies and procedures to select a QEP to assist with project implementation. MWVCOG routinely procures contractor services and has procedures in place to acquire these services through a competitive process.

e. Currently Has or Previously Received an EPA Brownfields Grant: NA

f. Has not previously received an EPA Brownfields Grant but has received other Federal/State/Local Grants.

(1) Accomplishments

COG manages over \$70M in active USDA/EPA/HUD CDBG funded sewer and water infrastructure grant administration projects ranging from \$1.3M to \$50M in size, across eight of our member cities. Additionally, we manage a \$1.4 million RLF small business loan program, and a housing rehab program.

ED23SEA3030022 EDA Partnership Planning Grant. COG was awarded a \$225k EDA partnership grant to help implement the five-year CEDS across our three county and 43 member territory.

HIIP 1025 Business Oregon Regional Water Coalition Grant. COG is facilitating a regional water resilience initiative grant thru Business Oregon for the cities of Amity, Lafayette, Carlton, Dayton, Dundee, McMinnville, Yamhill, and Yamhill County funded by Business Oregon. This project began with 6 months of monthly two-hour consensus-building meetings with mayors and city managers and county commissioners and staff to identify shared drinking water vulnerabilities resulting in application and award of regional grant.. Ongoing staffing and governance outputs include weekly check-ins with the technical study consultant, 3 Technical Advisory Committee meetings (TAC) to assist the consultant in developing the study deliverable, semi-weekly emailed progress updates to the city councils, mayors, and staff, county commissioners, state agencies, and state legislators, and 3 Policy Advisory Committee (PAC) meetings to facilitate inter-jurisdictional cooperation and planning. The final phase of the grant includes 7 individualized presentations to the participating city councils to review the study and authorize an alternatives analysis to inform the region's decision for system inerties, cost efficiencies and resiliency.

Business Oregon N26006 Brownfields Grant. COG is assisting the City of Aurora with a \$60k Phase I and II Brownfields project. COG assisted with agency consultation regarding the potential site, prepared and submitted the grant, and is assisting the city in procuring the Phase I and II consultants through a competitive process. Project completion date is February 2027.

(2) Compliance with Grant Requirements. MWVCOG complies with approved workplans, schedules, and terms and conditions for all referenced financial assistance agreements and applies documented systems for performance tracking, financial management, and reporting. COG has provided grant administration for over 25 years.

25SEA0G0027 DOC EDA RLF. The COG manages a portfolio of \$1.4M for small business lending including a \$400,000 EDA RLF grant it received in December 2024. COG prepared and submitted all necessary documentation included SF-424, ED 900F, RLF Plan, CD 511 and submits quarterly and annual updates.

EPA 02J25401/ HUD CDBG-CV IA 2210/ SWDR LF \$9M Willamina Water Intake Relocation Project. (\$9,000,000.) COG administers this drinking water infrastructure project for the City of Willamina funded through EPA, HUD, COVID-CV, SDWRLF. COG's work includes; AIS and BABA, Environmental Review, monthly disbursement requests, updated workplans and budgets to Business Oregon and EPA Project Performance Reports to DEQ. Labor compliance outputs included the technical audit of 20 weekly certified payroll reports, preparing and submitting semi-annual HUD 4710 Labor Standards reports, and conducting and completing 48 on-site interviews for 10% of the active workforce via form SF-1445. BOLI Payroll/Certified Statement Form WH-38. BOLI Payroll Certified Statement Form WH-347, DEQ 30%, 60%, and 90% completion. **IA2304 HUD CDBG-CV Food Bank Grant (\$250,000)(Closed).** COG prepared and provided all first draw requirements, environmental, and disbursement requests, three budget amendments and completed the final report. Business Oregon completed its periodic monitoring and issued a letter of no findings or concerns. This grant closed in 2025 with final compliance and all funds disbursed and in compliance.

ATTACHMENT 3

THRESHOLD CRITERIA

Mid-Willamette Valley Council of Governments EPA Brownfields Coalition Assessment Grant

III.B. Threshold Criteria for Assessment Grants

1. Applicant Eligibility

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

The Mid-Willamette Valley Council of Governments, as a council of governments, is eligible to apply for a cleanup grant. The foundational document for the COG is included as Attachment 4. None of the coalition members qualify for federal tax-exempt status under 501(c)4.

2. Number and Eligibility of Non-lead Coalition Members

There are a total of two non-lead coalition members:

- The City of Amity, Oregon is a General Purpose Unit of Local Government and is eligible to apply for and receive funding from an EPA Brownfields Assessment grant.
- The City of Dallas, Oregon is a General Purpose Unit of Local Government and is eligible to apply for and receive funding from an EPA Brownfields Assessment grant.
- The City of Salem, Oregon is a General Purpose Unit of Local Government and is eligible to apply for and receive funding from an EPA Brownfields Assessment grant.
- The City of Woodburn, Oregon is a General Purpose Unit of Local Government and is eligible to apply for and receive funding from an EPA Brownfields Assessment grant.

3. Target Areas

MWVCOG members have identified three Target Areas: the City of Amity (occupying parts of CT 41071031000), the City of Dallas (census tracts 41053020202, 41053020203, and 41053020204), City of Salem (CTs 41047000200-600, 41047000702-703, 41047000900 -1300, 41047001501-503, 41047001601, 41047001603, 41047001605, 41047001607-608, 41047001701-703, 41047001801-803, 41047002001, 41047002101-102, 41047002201-202, 41047002301, 41047002303-304, 41047002400, 41047002502, 41047002701-702, 41047002800, 41053005100, 41053005203-206, 41053005301-302), the City of Woodburn (census tracts 41047010304, 41047010305, 41047010307, 41047010308, and 41047010309)

4. Existing Brownfields Grants to Non-lead Members

a. Non-lead Member that Has Never Had an EPA Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup Grant

- The City of Amity
- The City of Woodburn, Oregon
- The City of Dallas, Oregon

b. Coalition Agreement

The Memorandum of Agreement between the Mid-Willamette Valley Council of Governments, the City of Amity, Oregon, the City of Salem, Oregon, the City of Woodburn, Oregon, and the City of Dallas, Oregon, is provided as Attachment 5, immediately following this Threshold Criteria document.

c. Community Involvement

MWVCOG will designate Project Manager, Laura Conroy, as the point of contact, and the coalition will form a Brownfields Advisory Committee (BAC) consisting of representatives from project partners (Table 9 in grant application narrative). The BAC will meet quarterly with in-person and virtual options and will assist in developing a written public involvement plan (PIP) using the priority sites described in the application narrative and a brownfield inventory for each Target Area to give input on site prioritization, provide feedback on next steps at priority sites and assist with property owner outreach. Coalition members will hold monthly project management meetings and share update materials with members for their own leadership updates. Coalition members will conduct meetings with 20 owners of identified potential brownfield sites to educate them about this grant.

The Coalition will also convene 8 community open houses over the course of the grant, each with a focus on different aspects of community education and engagement. Community open houses will be advertised via radio stations such as Spanish-language KWBY and KWIP in Woodburn and Dallas, the *Woodburn Independent*, the *Polk County Itemizer-Observer* for Dallas, and the *News Register* in Sheridan, and at food bank, library, senior center, community center, chamber of commerce, and city venues such as list serves, newsletters, bulletin boards, and websites. MWVCOG will collect attendance information and record all public comments at each BAC and community open house. Input received at meetings and via other channels will be compiled, reviewed, and incorporated into decision-making processes. Subsequent communications will note responses to community feedback.

MWVCOG will communicate project progress to Coalition members and project partners and will share public updates at least quarterly via its website, social media, and e-newsletter, will encourage members and project partners to share through their own channels, and will provide stipends to assist partners with the expense of translating materials into Spanish and providing interpretation at meetings. MWVCOG will also work with members and project partners to organize quarterly presentations to social and professional organizations and meet with neighbors near priority sites.

7. Expenditure of Existing Grant Funds

MWVCOG, the City of Woodburn, City of Salem, the City of Dallas and the City of Amity are not currently parties to a Multipurpose cooperative agreement with EPA.

8. Contractors and Name Subrecipients

Contractors and subrecipients have not been selected for this effort.