PORTLAND PARKS & RECREATION
Healthy Parks, Healthy Portland

R10-26-C-004

Application Information Sheet

1. Applicant Identification

Portland Parks & Recreation
1120 SW 5th Avenue, Suite 858
Portland, OR 97204

2. Website URL

Portland Parks & Recreation: https://www.portland.gov/parks
Portland Bureau of Environmental Services: https://www.portland.gov/bes

3. Funding Requested

(a) Grant type: Single site EPA Brownfields Cleanup Grant
(b) Federal funds requested: $1,925,665

4. Location

(a) City: Portland
(b) County: Multnomah
(c) State: Oregon

5. Property Information

Tax Lot 1N1E33BA-00102
Block 290 East
NW Corner of NW Pettygrove Street and NW 20th Avenue
Portland, Oregon 97209
See site map attached.

6. Contacts

6.a. Project Director

Alex Shook
Portland Parks & Recreation
503-250-0670
Alex.Shook@portlandoregon.gov
1120 SW 5th Avenue, Portland, Oregon 97204

6.b. Chief Executive/Highest Ranking Elected Official

Keith Wilson, Mayor
City of Portland
503-823-4120
mayorgrantapplications@portlandoregon.gov
1221 SW 4th Avenue, Portland, Oregon 97204

7. Population

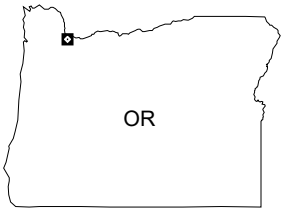
635,749 (US Census estimate, 2025)

8. Other Factors

Other Factors	Page #
Community population is 15,000 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. N-4
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).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	p. N-3
The reuse of the proposed site(s) will incorporate energy efficiency measures.	p. N-3, N-4
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	p. N-1, N-2, N-3, N-5
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	N/A

9. Releasing Copies of Applications

N/A



MAP SOURCE: ESRI
SITE COORDINATES: 45°31'59"N, 122°41'37"W

HALEY ALDRICH

BLOCK 290 EAST
PORTLAND, OREGON

PROJECT LOCUS

APPROXIMATE SCALE: 1 IN = 1000 FT
DECEMBER 2024

FIGURE 1

GIS: \\haleyaldrich.com\share\CF\Projects\0211348\GIS\211348_001_BLOCK_290_EAST_PHASE_II.aprx - ayabu - 11/25/2024 8:58 AM

NARRATIVE CRITERIA

1. Project Area Description and Plans for Revitalization

TARGET AREA AND BROWNFIELDS

1.a. Overview of Brownfield Challenges and Description of Target Area

The City of Portland Parks & Recreation (PP&R) requests a $1,925,665 U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Grant to remediate a contaminated site in the City of Portland (the City, 145 sq. mi.). The target area (TA) consists of Census Tracts (CT) 49.01 (population 3,191) and 50.02 (population 1,309) in Multnomah County, Oregon (the County). The priority site is located within CT 50.02, but is adjacent to and east of CT 49.01. Both populations will directly benefit from cleanup and reuse. The TA is bordered by NW Thurman Street to the north, NW 17th Avenue and NW Lovejoy Street to the west, W. Burnside Street to the south, and Interstate 405 to the east.

The TA is in the City's northwest "Slabtown" neighborhood, which is bound by the Willamette River to the north and east, the Northwest Industrial District to the north and west, the West Hills' foothills to the west, and downtown Portland to the south. Slabtown acquired its name in the 1870s from the many lumber mills that first populated the area and employed large numbers of laborers. The early 20th century brought manufacturing and shipbuilding, which boomed during World War II. As the City's economy transitioned away from resource extraction and manufacturing, these businesses left behind brownfields with soil and groundwater contaminated with petroleum, metals, and other hazardous substances. These properties limit land available to accommodate the growth of much-needed housing, jobs, and public amenities like recreational space and parks. Oregon's strict land use laws amplify brownfields' impacts. In Oregon, urban growth boundaries (UGBs) limit city expansion to protect forests and farmland, and changing UGBs is an expensive and time-intensive process. Brownfields further constrain what limited land is available for redevelopment in the City. Brownfield redevelopment is therefore the only feasible way to generate more land for open space and other essential uses.

Today, Slabtown is a densely populated residential neighborhood that has been disproportionately impacted by the City's industrial history. The TA's population grew by 84% from 2020 to 2023, more than 10 times the growth rate of the City and the County during this same period. This rapid growth increased demand for parks, recreational space and public gathering spaces. However, the TA and surrounding community have been identified as deficient based on PP&R Level of Service Guidelines which recommend a neighborhood park within 0.5 mile of every resident (see 1.c). Lack of available green space disproportionately impacts low-income communities, reduces opportunities for outdoor activity, and can lead to poorer public health outcomes. Brownfield reuse is PP&R's only option for meeting TA residents' need for open space. By facilitating brownfield reuse in the TA, this grant will create public green space for safe outdoor recreation, protect the bordering and sensitive Willamette River, enhance green space and facilitate safe recreation, social connection, and bolster resilience by mitigating the effects of extreme heat. This grant will also reduce the risk that future flood events might spread contamination to nearby residents (who are predominantly renters, lower income, and have existing adverse health conditions). Research shows that as cities grow and invest more in parks and open spaces, they attract and retain workforce through the expansion of businesses and growing residential populations. This, in turn, spurs demand for real estate market activity and private investment to build and redevelop housing and commercial space.[1]

1.b. Description of the Proposed Brownfield Site(s)

This grant will remediate a 1.06-acre site known as the City's Block 290 East (no physical address), located at the northwest corner of NW Pettygrove Street and NW 20th Avenue in urban northwest Portland (the Site). The Site consists of 1 parcel adjacent to a mixed-use multi-family development with a privately-owned, public hardscape community plaza to the west, NW Quimby Street to the north, NW 20th Avenue to the east, and NW Pettygrove Street to the south. The Site is vacant, with no structures, and was occupied by a church and residential properties from 1901 to approximately 1950, a Consolidated Auto Truck Service and Parking facility

[1] Trust For Public Land, 2024. https://www.tpl.org/parks-and-economic-vitality-report.

from 1959 to 1967, and a facility known as the former Consolidated Freightways truck maintenance building from approximately 1967 to 2020. During this period, trucking operations and underground storage tanks (USTs) contributed to contamination of the Site with petroleum hydrocarbons and arsenic. Since 2020, the lot has remained vacant and was most recently used as a construction staging area for the new adjoining residential building. A 2024 Phase II Environmental Site Assessment (ESA) indicated concentrations of arsenic in surface soil above background concentration and diesel range hydrocarbons up to 11 to 12 feet below ground surface. Cleanup, including removal of arsenic and petroleum-contaminated soils, is necessary to facilitate safe construction of a new and much-needed public park (see 1.c.).

REVITALIZATION OF THE TARGET AREA

1.c. Reuse Strategy and Alignment with Revitalization Plans

The Site reuse strategy envisions a new public park, with 1 square block of open green space for passive and active recreational use, including support features such as seating, restrooms, and trash cans, connected to an adjoining hardscape plaza attached to a neighboring multifamily development. The exact features provided in the new park will be guided by PP&R's Level of Service guidelines which identify gaps in the park system and through engaging with the public to learn about priorities and needs. Reuse will address a community priority and serve low-income and economically distressed populations in the TA (see 2.a.). Since 2012, the City has planned to develop the Site into a park, and in fiscal year 2015 funding was allocated for capital expenses. However, environmental contamination, changes in property ownership, and adjacent construction all stalled efforts. Park development has been further impeded by a lack of funding needed to address contamination. The Site is not located within a federally designated flood plain.

Table 1 illustrates how this reuse strategy aligns with the community's expressed priorities and with publicly informed City plans. Community stakeholders and project partners, such as the Northwest District Association (see 2.e-f), have advocated to PP&R about the need for a new park in the area for over a decade, and their feedback has informed related plans. Furthermore, Site remediation and new park development directly align with the goals of Portland's Strategic and Comprehensive Plans to invest in brownfields, support greenway access, and provide park access to low-income Portlanders.

Table 1. Reuse Strategies and Alignment with Revitalization Plans

Entity	Plan	How Project Relates
City of Portland	Con-way Master Plan (2012)	Identifies the Site for redevelopment into a neighborhood park, dating back to 2012. **Supports public space** for those living and working in the neighborhood.
PP&R	2017-2020 Strategic Plan	Site reuse supports key plan focus areas, including **park stewardship**, increased **park access** for low-income Portlanders, and **safe recreation** opportunities.
PP&R	Parks 2020 Vision Plan	Site reuse supports plan goal for **redevelopment of existing land,** including for parks/natural areas, within the urban growth boundary.
PP&R	Level of Service Guidelines	Identifies gaps in PP&R's system. Deficiencies that exist in the Slabtown Neighborhood include: neighborhood park, children's play area, community garden, and spray play.
PP&R	Healthy Parks, Healthy Portland	Highlights City's need for community-informed, safe, healthy, resilient, connected and economically productive parks.
City of Portland	2035 Comprehensive Plan	Aligns with City policies supporting **economic prosperity** through brownfields reinvestment to support job growth; **human health** through complete neighborhoods and access to greenways; **environmental health** through expansion of green spaces and infrastructure to reduce heat island effects; and **resilience** through increased tree canopy and drought-resistant vegetation.
City of Portland	Climate Emergency Workplan (2022-25)	Aligns with City goals to **sequester carbon** in trees and green spaces and **improve resilience** to extreme weather events, focusing on those at the highest risk.
Oregon Metro	2040 Growth Concept	Supports neighborhood growth goals to redevelop on vacant or underutilized land. Aligns with goals to define neighborhoods, **encourage economic activity** through mixed-use development/street trees and lighting, **reducing the amount of auto traffic** while **increasing foot traffic**.

1.d. Outcomes and Benefits of Reuse Strategy

A new park will improve safe recreational and green space access in the TA, which can lead to improved health outcomes.[2] PP&R will engage with Guardian, a private developer, to connect the park to a public hardscape community plaza at the adjoining mixed-use multifamily development immediately to the west (also developed by Guardian), providing additional space for public access, events, and services (Table 6). This is particularly important given the TA's rapid growth (see 1.a.) and expanded need for both recreational and green space. Park development at the Site would encourage outdoor recreation and social connection, which can benefit the mental and physical health of vulnerable and sensitive populations.

A new park will also protect City residents and the Willamette River's sensitive environment from contamination (see 1.b.). Reuse will transform a large impervious surface into a permeable one, reducing the volume and speed of stormwater runoff carrying pollutants into the Willamette River, and ultimately, to the Columbia River into which it flows. Parks and associated infrastructure like bioswales and rain gardens, use of which will be determined during PP&R's community-informed design process, use soil and other media to capture and treat stormwater through infiltration, which helps mitigate flood risk and pollutant loads.[3] Grass and trees reduce flood risk by limiting the volume and velocity of stormwater, which mitigates destructive impacts on infrastructure and local ecosystems. In addition, improvements in water quality resulting from the natural filtration of contaminants in stormwater runoff will enhance downstream water quality and protect the health of aquatic life, including endangered species such as salmon, and the health of people who engage in subsistence fishing for economic or cultural reasons and are often disproportionately low-income.[4]

The park would be constructed with resilience to extreme weather as a top priority. In the summer of 2021, the region endured record-breaking high temperatures caused by a "heat dome." Temperatures in the City hit 116°F, killing 72 people across the County. Tree plantings will help mitigate urban heat island effects, lowering temperatures and contributing to carbon sequestration, which improves air quality. The urban heat island effect occurs when urban landscapes (e.g., heavily paved, as in the TA) are warmer than nearby rural surroundings due to impermeable and reflective surfaces and lower levels of evaporative cooling. However, development of parks and green spaces, as well as tree planting, has been shown to decrease air temperatures by as much as 1.8°F compared to non-green space.[5] Any new facilities at the Site, such as bathrooms, will incorporate energy efficiency measures consistent with Oregon Energy Efficiency Specialty Code (OEESC), which exceeds the standards set by many states. In addition, reuse plans, particularly for any new buildings on the Site (e.g., bathrooms, picnic shelters) would consider development of solar generation.

The park will make the entire TA more attractive to the workforce and businesses; reuse therefore supports commercial development, job creation, and real estate development that contribute to economic development and an improved quality of life. For example, local public park and recreation agencies in the U.S. generate over $201B in economic activity and support almost 1.1 million jobs. In the post-pandemic era of increasing remote/hybrid work options, in which 9% of jobs in Portland are home-based businesses in residential areas, parks are a critical tool to attract and retain workforce.[6] A growing workforce will attract companies to start and expand their businesses, generating real estate market activity and spurring the development of housing and commercial spaces.[7]

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[2] City of Portland, Parks 2020 Vision. https://www.portland.gov/sites/default/files/2020/ppr-2020-vision.pdf

[3] Environmental Protection Agency, Stormwater Management Research. https://www.epa.gov/water-research/stormwater-management-research

[4] California Sea Grant. (n.d.). The predicament: Subsistence fishing and seafood contaminants. University of California San Diego. https://caseagrant.ucsd.edu/news/predicament-subsistence-fishing-and-seafood-contaminants

[5] GSI Impact Hub, Heat Reduction Benefits of Stormwater Infrastructure. https://gsiimpacthub.org/wp-content/uploads/2025/03/GSI_Heat-Reduction_Summary_Oct2024.pdf

[6] City of Portland, 2035 Comprehensive Plan. https://www.portland.gov/bps/planning/comp-plan-2035/about-comprehensive-plan/2035-comprehensive-plan-and-supporting#toc-2035-comprehensive-plan-as-amended-through-may-2023

[7] Trust for Public Land, Parks Investment and Economic Vitality. https://www.tpl.org/wp-content/uploads/2024/09/TPL-Park-Investment-and-Economic-Vitality-in-Cities-09_19_24.pdf

STRATEGY FOR LEVERAGING RESOURCES

1.e.-g. Resources Needed for Site Characterization, Remediation, and Reuse

Site characterization is complete and has been approved by the Oregon Dept. of Environmental Quality (DEQ); no additional funding is required. This grant will be sufficient to complete remediation (see 3.a) and advance the Site toward a DEQ Notice of No Further Action. Through system development charges (SDCs), PP&R has committed $5 million to support park construction. PP&R will use SDC funds to retain a design consultant, plan, design, and build the new park with energy-efficient components and nature-based stormwater infrastructure after the grant concludes; it will seek state funds in Table 2 if necessary. Without this grant, SDC funds must cover the costs of cleanup, which will eliminate resources currently allocated to park development. In total, PP&R will leverage EPA grant funds at a ratio of $2.64 City dollars to every EPA dollar.

Table 2. Potential Resources for Site Characterization, Remediation, and Reuse

Name of Resource	Resource Designation	Secured or Unsecured?	Additional Details or Information About the Resource
System Development Charges Funds	(1.g.) Reuse	Secured	$5 million allocated for design and construction of new park (see attached commitment letter). To date, $336,530 has been spent on site assessment, other costs associated with acquiring the property, and developing the Contaminated Material Management Plan.
Oregon Metro Brownfields Assessments Grants	(1.e.) Assessment	Unsecured, eligible	Could support assessment if additional funding is required.
Business OR Brownfields Redevelopment Fund	(1.e.) Assessment (1.f) Remediation	Unsecured, eligible	Could support assessment/remediation via loans/grants if additional resources are required.
Business OR Brownfields Cleanup Fund	(1.f) Remediation	Unsecured, eligible	Could support remediation through loans/grants.
Oregon DEQ Clean Water State Revolving Fund (CWSRF)	(1.g) Reuse	Unsecured, eligible	Could support stormwater and wastewater infrastructure via low-interest, partially forgivable loans.
Oregon Parks and Recreation Local Government Grants	(1.g.) Reuse	Unsecured, eligible	Could support interpretative signage/facilities in park (tables/restrooms) to enhance access, connectivity, and mobility.
Oregon Parks and Recreation Land and Water Conservation Fund	(1.g.) Reuse	Unsecured, eligible	Could support development of outdoor recreation facilities.

1.h. Use of Existing Infrastructure

Apart from road connections, the Site has no existing infrastructure. Site reuse will require water, sewer, stormwater, electrical, and broadband. However, these types of City infrastructure are available adjacent to the Site and can be connected. PP&R also plans to improve rights-of-way (sidewalks, curbs, parking, etc.) in the adjoining streets to the south and east of the Site, and NW Quimby Street is slated for development of a pedestrian/bicycle greenway. PP&R's commitment of $5 million in leverage will support infrastructure development; PP&R anticipates pursuing infrastructure-focused grants and loans listed in Table 2 to supplement this funding if needed.

2. Community Need and Community Engagement

COMMUNITY NEED

2.a. The Community's Need for Funding

Due to its small size and lower incomes, the TA is unable to draw on other sources of funding to carry out remediation. Due to many factors, including a 3-year pause in collecting new SDC funds, an estimated $750 million in outstanding capital major maintenance needs, and continuing budget cuts, PP&R has insufficient funding to support both remediation and park development. Furthermore, significant population expansion in the TA rapidly generated unmet demand for services and amenities. The percentage of people below the poverty level in CT 49.01 is 2.1% above the City's rate and 2.4% above the County's. Median household income in the TA are 8% (CT 50.02) and 24% (CT 49.01) lower than the Portland average. Furthermore, the unemployment rate in CT 50.02 exceeds the Portland and Oregon average by 1.4% and 1.5%, respectively.

People living below poverty level may have a harder time securing healthy food and are statistically more likely to experience depression and have higher health risks, greater social needs, and worse access to care.[8] The TA's relative affordability for lower income people drove its substantial population growth, but even so, since 2020, housing costs have significantly outpaced wage growth. Because TA residents are older (see 2.b), more likely to live on a fixed income and more likely to struggle to meet basic needs, the TA lacks discretionary income to support cleanup.[9]

Table 3. Economic and Population Data

Indicator	TA (CT 50.02)	TA (CT 49.01)	Portland	Multnomah County	Oregon	United States
2020 Population	712	2,469	650,380	809,869	4,176,346	326,569,308
2023 Population	1,309	3,191	642,715	803,863	4,238,714	332,387,540
Percent Change in Population (2020 to 2023)	84%	29.2%	-1.2%	.7%	1.5%	1.8%
Median Household Income	$81,731	$67,930	$88,792	$86,247	$80,426	$78,538
Below Poverty Level	6.8%	14.9%	12.8%	12.5%	11.9%	12.4%
Unemployment Rate	6.9%	4.1%	5.5%	5.4%	5.4%	5.2%

Notes: *Shading indicates disparities compared to the county, state, or the U.S. Data Source: U.S. Census 2023 American Community Survey (ACS) 5-year estimates (2019-2023). Due to lack of data for the Census Tracts, 2020 population figures were used. The 2023 ACS 5-year estimates were used for all other indicators.*

Although the City's median household income exceeds that of the TA and County, this figure hides significant local variation. Lower income residents are more likely to depend on public services for transportation, recreation and other basic needs. The City's budget is focused on addressing those needs, which it will do in this project by supporting as much park design and development as its available funding can support, and by pursuing additional federal and state grants to secure sufficient funding to complete the project (see 1.e.-g.). This, however, leaves no discretionary funding for unexpected expenses like remediation, and makes outside support from EPA critical.

2.b. Health or Welfare of Sensitive Populations

Within the TA, CT 49.01 is home to 27% more people over age 65 (18.1%) compared to the City (14.2%) and County (14.4%). Those over 65 who live below the poverty line are also substantially overrepresented in CT 49.01 (37.5%) compared to the state (9.4%), County (11.3%) and City (11.8%). Welfare issues for these groups include fixed incomes, which make access to no-cost public recreational space critical for physical exercise and social connection that can significantly improve cardiovascular health, quality of life and mental health. Extreme heat is a significant challenge impacting sensitive populations in the TA. Extreme heat can aggravate asthma, cardiovascular conditions, and other chronic conditions. People with chronic medical conditions and children, adults over 65, people living, working, or attending school in an urban heat island, and people without access to cooling in their homes are all at increased risk of the negative effects of heat exposure.[10] People over 65 are particularly vulnerable to extreme heat, and tend to experience disproportionate mortality from extreme heat exposure.[11] By 2050, the TA is projected to experience an additional 23 days of extreme heat per year.[12] Park reuse will help mitigate these risks. Studies show that an increase in vegetative area can reduce heat-related mortality by over 30% when implemented at sufficient scale.[3,4] Park reuse will substantially increase greenspace in an area that currently lacks it, contributing to evaporative cooling and helping mitigate urban heat island effects, to the benefit of all TA residents but especially people over 65.

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[8] Zare et al. 2022. How Income and Income Inequality Drive Depressive Symptoms in U.S. Adults, Does Sex Matter: 2005–2016, Int J Environ Res Public Health, 19(10):6227, doi:10.3390/ijerph19106227.

[9] Oregon Housing and Community Services. (2024). State of the state's housing. State of Oregon. https://www.oregon.gov/ohcs/about-us/Documents/state-of-the-states-housing.pdf

[10] National Integrated Heat Health Information System. Who is most at risk to extreme heat? https://heat.gov/who-is-most-at-risk-to-extreme-heat/

[11] Godman, H. (2022, June 1). Warning: Older age makes you vulnerable to the summer heat. Harvard Health Publishing. https://www.health.harvard.edu/diseases-and-conditions/warning-older-age-makes-you-vulnerable-to-the-summer-heat

[12] ClimateCheck. (n.d.). Portland, Oregon climate change risks and hazards. https://climatecheck.com/oregon/portland

Table 4. Sensitive Populations

Indicator	TA (CT 50.02)	TA (CT 49.01)	Portland	Multnomah County	Oregon	United States
Age Above 65	6.0%	18.1%	14.2%	14.4%	18.6%	16.8%
Age Above 65 Below Poverty	N/A	37.5%	11.8%	11.3%	9.4%	10.4%

Notes: *Shading indicates higher sensitive populations in the target area compared to county, state, or U.S. Data Source: U.S. Census 2023 American Community Survey 5-year estimates (2019-2023).*

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

Table 5 shows that TA residents are 15% more likely to experience asthma and 56% more likely to suffer from depression as adults compared to the national average. By creating green space that can help improve air quality through carbon sequestration and reduce urban heat island impacts through evaporative cooling, Site reuse can help reduce asthma symptoms.[3,5,9] Recreational and health benefits associated with green space have also been shown to reduce the prevalence of depression.[13] Park reuse will also facilitate social connection, which has been identified as particularly important to reduce the impacts of depression in older adults.[14]

Table 5. Inequitable Health Burdens

Health Measure	TA (CT 50.02)	TA (CT 49.01)	Portland	Multnomah County	United States
Asthma among adults	11.3	11.4	11.9	11.7	9.8
Depression among adults	32.3	31.4	30.1	29.9	20.7

Notes: *2023 CDC PLACES Data. *Age-adjusted percentages were used at the City, County, and national level. Age-adjusted data were not available at the CT level, and therefore crude prevalence percentages were used.*

2.d. Economically Impoverished/Disproportionately Impacted Populations

TA residents are disproportionately economically impoverished (Table 3) and experience lack of economic mobility. Children who grow up in the TA experience poor financial outcomes, with an average income at age 35 of $26,000 per year – just 30% of the City average.[15] Compounding these challenges, up to 44% of TA renters are estimated to be housing burdened, meaning they spend over 30% of income on housing.[16] TA residents are also disproportionately impacted by commercial and industrial operations, especially air quality issues and traffic on Interstate 405 and State Highway 30, which run to the TA's east and north, respectively.

Historically the TA was an industrial hub with few residents. In 2012, the Con-way Master Plan was adopted by the City of Portland. The Master Plan reenvisioned 15.62 acres of predominantly industrial land owned by Con-way Trucking as future mixed-use development. Over the past 13 years the Master Plan has been implemented, and the area has transformed from an industrial hub to an active mixed-use neighborhood. The Site is located at the southern edge of the Con-way Master Plan. Given the TA history, there are few parks nearby. Wallace Park is approximately 0.5 mile west of the Site, Couch Park is approximately 0.4 mile south, and the Fields is approximately 0.5 mile east. There are no parks north of the Site, where much of the recent development has occurred. For residents in this newly developed neighborhood, the distance to the nearest park exceeds 0.5 mile, which exceeds the PP&R target Level of Service (Table 1, see 1.c). Many community members already face limited access to key social determinants of health, such as affordable housing, jobs, and transportation, which are significant obstacles to well-being. By facilitating easy access to public park space, this grant can help reduce some of these economic impacts.

COMMUNITY ENGAGEMENT

2.e. Project Involvement and 2.f. Project Roles

Table 6 below provides a list of organizations involved in this project and their roles.

[13] Liu, Z., Chen, X., Cui, H. et al. Green space exposure on depression and anxiety outcomes: A meta-analysis. Environmental Research (2023).

[14] Donovan, N. J., & Blazer, D. (2020). Social isolation and loneliness in older adults: Review and commentary of a National Academies report. The American Journal of Geriatric Psychiatry, 28(12), 1233–1244. https://doi.org/10.1016/j.jagp.2020.08.005

[15] Census Bureau and Harvard University. The Opportunity Atlas: Mapping Economic Mobility Across the US.

[16] 2021 Housing Burden By Oregon Census Tracts.

Table 6. Organizational Involvement and Roles

Name of Organization/ Entity/Group	Point of Contact (name & email)	Specific Involvement in Decision-Making
City of Portland Bureau of Environmental Services	Taryn Meyer taryn.meyer@portlandoregon.gov	Supporting technical environmental phases of project delivery, coordination with all the City's bureaus.
Oregon DEQ	Kara Master kara.e.master@deq.oregon.gov	Provide technical assistance and guidance through the Voluntary Cleanup Program.
Northwest District Association (community nonprofit)	Todd Zarnitz president@nwdaportland.org	Support/participate in community outreach, especially to Site neighbors. Host community meetings, share project updates, provide input for remediation and reuse planning.
Guardian Real Estate Services (developer of adjoining multifamily building to west)	Tom Brenneke Thomas.brenneke@gres.com	Share project updates with Site neighbors who are residents of Guardian-owned multifamily building to Site's west. Provide input for reuse planning and use of adjoining Guardian-owned hardscape.
Cairn Pacific (commercial, retail, and multifamily mixed-use development company)	James Santana james@cairnpacific.com	Support and participate in community outreach, especially to Site neighbors, host community meetings, share project updates, provide input for remediation and reuse planning.
Northwest Library Multnomah County Library (local branch is immediately south of the Site)	Karen Wilkinson Karenw@multcolib.org	Host community meetings, share project updates, provide input for remediation and reuse planning.
Portland Parks Foundation	Jessica Green Jgreen@portlandpf.org	Provide input for remediation and reuse planning, and share best practices and examples. Share project updates.
Pearl District Neighborhood Association	Bruce Studer [redacted]	Provide input related to remediation and reuse planning.

2.g. Incorporating Community Input

Upon award, PP&R will develop a Community Engagement Plan (CEP) to document and formalize processes to share information and seek public input to inform cleanup and park design decision making. Partners in Table 6 will review and provide input to the CEP. PP&R will develop a project webpage and provide project updates on at least a quarterly basis during Site cleanup planning, cleanup and redevelopment. Online and printed project information will be made available in multiple languages. Outreach will include identifying people with poor access to resources or low English proficiency communities impacted by the project, and developing specific engagement strategies to reach them. Tools such as surveys, focus groups, advisory committees, and public meetings will be used to solicit feedback from the community.

The City will record meeting attendance and comments (up to 48 meetings throughout the project period, averaging one/month) for consideration during cleanup implementation and design. The City will advertise meetings using social media, website updates, email distribution lists, and fliers. The City will share at least quarterly project updates with partners in Table 6 for distribution to their networks, and will provide opportunities for written and electronic comments between and at each community meeting. The City will refer technical questions to its qualified environmental professional (QEP) and questions about community welfare and needs to appropriate partners. The City will record all public comments, transparently share them on its website as part of meeting summaries, and at subsequent public meetings share how feedback has been incorporated into the cleanup plan and/or explain why certain feedback was not, or could not, be included. The City will meet with community members living closest to the Site to directly share information about cleanup progress, including technical information with support from project partners and its QEP. The City will track and evaluate progress on community engagement monthly. Schedule or budget deviations will be addressed early, and adjustments will be made in alignment with the City's project goals and required outputs.

3. Task Descriptions, Cost Estimates, and Measuring Progress

3.a. Proposed Cleanup Plan

The preferred remedial action (draft ABCA Alternative 3) includes the removal of approximately 2,600 tons of concrete and asphalt hardscape features and removal of arsenic in soils across the Site. Removal of hardscape will be followed by 3 feet of soil removal across the Site and removal of petroleum hotspot soils (approximately 7,243 tons total). Upon soil removal and sampling to confirm removal of contaminants, a

demarcation fabric would be installed, and clean fill soil imported to bring the Site to grade with surrounding streetscape. Removal of hot spot petroleum-impacted soil will consist of the removal of approximately 525 cubic yards of soil down to a maximum approximate depth of 12 to 14 feet deep in an area on the eastern perimeter of the Site. All contaminated soil will be disposed of at an appropriate offsite facility.

This alternative would have the beneficial effect of preparing the Site for planting. To increase the sustainability of the selected alternative, several techniques are planned. The most recent Best Management Practices (BMPs) issued under ASTM Standard E-2893: Standard Guide for Greener Cleanups will be used as a reference in this effort. This would include minimizing the number of mobilizations to the Site and instituting erosion control measures to minimize runoff. In addition, the City will request bidding cleanup contractors to propose additional green remediation techniques in their response to the Request for Proposals for the cleanup contract (for example incorporating Salmon-Safe Certification recommendations).[17]

DESCRIPTION OF TASKS/ACTIVITIES AND OUTPUTS

3.b.-e. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, Outputs

The City will support all project management and community outreach and is not requesting EPA funding for these activities. The City estimates that its in-kind contribution of staff time is valued at $91,000 (.125 FTE over the course of the four-year grant period, see attached leverage documentation).

Table 7. Tasks and Activities

Task 1 – Project Management
i. Project Implementation, EPA grant funded activities: None. Non-EPA grant funded activities: The City will monitor schedule and budget, report on activities and accomplishments to stakeholders. It will procure a QEP in compliance with 2 CFR 200.317-326 and all applicable EPA guidelines and best practices. The City will oversee QEP and review documentation/reporting. The City and QEP will meet monthly to review progress, monitor timelines/budget, and make any adjustments needed to achieve project goals.
ii. Anticipated Project Schedule: Ongoing throughout grant period. Work will begin upon completion of EPA-approved workplan, assumed Oct. 1, 2026 to Sep. 30, 2030.
iii. Task/Activity Lead: The City, Assist: QEP
iv. Outputs: Up to 48 project meetings, monthly 1-page QEP updates summarizing completed and anticipated work, up to 15 quarterly reports, up to 16 Assessment, Cleanup, and Redevelopment Exchange System (ACRES) updates, and 1 close-out report detailing grant activities, cleanup progress and remaining needs.
Task 2 – Community Outreach
i. Project Implementation, EPA grant funded activities: None. Non-EPA grant funded activities: The City will develop a CEP, issue quarterly project updates and conduct community meetings at key milestones, such as grant initiation, cleanup planning, during cleanup, and cleanup completion. The City will work closely with project partners (Table 6) and QEP to conduct direct outreach to impacted stakeholders.
ii. Anticipated Project Schedule: Oct. 1, 2026 to Sep. 30, 2030. Community meetings in Jan. 2027 (pre-construction, cleanup planning), May & Dec. 2027 (mobilization/cleanup), May 2028 (post-cleanup). Other meetings as needed.
iii. Task/Activity Lead: The City, Assist: QEP
iv. Outputs: 1 CEP, 4 community open houses and notes/attendance/recordings, 16 press releases/blogs/website updates/social media posts, and direct community outreach with notes/summaries.
Task 3 – Cleanup Planning
i. Project Implementation, EPA grant funded activities: Hold 30-day public review and comment period for draft ABCA; finalize ABCA to incorporate comments from public/regulatory review and obtain R10 EPA Project Manager approval; secure all permits/regulatory approvals; develop Site cleanup plans including HASP, QAPP, and SAP; complete 100% remedial design documents; prepare bid documents for soliciting cleanup contractors and complete bidding process. QEP will assist the City with competitively procuring a remediation contractor in compliance with 2CFR 200.317-326, which Project Manager will oversee with QEP assistance. Non-EPA grant funded activities: None.
ii. Anticipated Project Schedule: ABCA finalization by Jan. 26, 2027. All permits/approvals, QAPP, HASP and SAP complete/approved by April 2027. Bid documents complete by May 2027. Contractor selected by Aug. 2027.
iii. Task/Activity Lead: QEP, Assist: The City
iv. Outputs: 1 final ABCA; 1 HASP, QAPP, SAP; 100% remedial design documents; 1 set of bid documents; 1 cleanup plan

[17] Salmon-Safe. (2025, April). Salmon-Safe accreditation program (AP) guidelines for large-scale construction management (Version 2.4). https://salmonsafe.org/wp-content/uploads/2025/04/SS-AP-Guidelines-for-Large-Scale-Construction-Management-Version-2.4-April-2025-FINAL.pdf

Task 4 – Site Cleanup	
i. Project Implementation, EPA grant funded activities: Contractor cleanup activities will include removal of hardscape, followed by 3 feet of soil from across the Site, and removal of petroleum hotspot soils. QEP will work with the City to ensure cleanup meets City, state, and federal regulations and that Site advances toward regulatory closure. Non-EPA grant funded activities: None	
ii. Anticipated Project Schedule: Procure contractor by Aug. 2027. Begin cleanup Oct. 2027, complete by June 2030.	
iii. Task/Activity Lead: Contractor, Assist: The City, QEP	
iv. Outputs: 1 Site ready for regulatory closure and reuse, 1 cleanup final report detailing progress and any remaining needs	
Notes:	
ABCA = Analysis of Brownfields Cleanup Alternatives	*R10 EPA = EPA Region 10*
HASP = Health and Safety Plan	*SAP = Sampling and Analysis Plan*
QAPP = Quality Assurance Project Plan	

3.f. Cost Estimates

The City does not plan to issue subawards or participant support costs. QEP costs are based on an average of $200/hour. Cleanup costs are based on estimates provided by environmental consultants in January 2025.

Table 8. Budget Table

Budget Categories		Project Tasks ($)				
		Task 1: Project Management	Task 2: Community Outreach	Task 3: Cleanup Planning	Task 4: Site Cleanup	Total
Direct Costs	Contractual	$ -	$ -	$ 60,000.00	$ 16,000.00	$ 76,000.00
	Construction	$ -	$ -	$ -	$1,809,665.00	$ 1,809,665.00
	Other	$ -	$ -	$ 25,000.00	$ 15,000.00	$ 40,000.00
Total Direct Costs		$ -	$ -	$ 85,000.00	$1,840,665.00	$ 1,925,665.00
Indirect Costs						
Total Budget (Direct + Indirect)		$ -	$ -	$ 85,000.00	$1,840,665.00	$ 1,925,665.00

Table 9. Cost Estimate Table

Task	Cost Basis and Assumption: avg. rate $200/hour for QEP
1. Project Management	All Task 1 activities will be funded by the City of Portland.
2. Community Outreach	All Task 2 activities will be funded by the City of Portland.
3. Cleanup Planning	Contractual Costs: $60,000. Project Specification Preparation (50 hrs x $200/hr = $10,000); Permitting support (80 hrs x $200/hr = $16,000); Workplan/SAP/QAPP (50 hrs x $200/hr = $10,000); HASP/H&S planning (20 hrs x $200/hr = $4,000); Contractor Procurement (100 hrs x $200/hr = $20,000). Other Costs: $25,000. DEQ oversight (125 hrs x $200/hr = $25,000).
4. Site Cleanup	Contractual Costs: $16,000. Project Completion Report (80 hrs x $200/hr = $16,000. Construction Costs: $1,809,665. Concrete disposal (1,545 tons x $75/ton = $115,875); Asphalt Disposal (1,054 tons x $75/ton = $79,050); Soil Disposal (7,968 tons x $80/ton = $637,440); Import Fill Soil (5,902 CY x $25/CY = $147,550); Contractor Labor (3,000 hrs x $182/hr = $546,000); Contractor heavy equipment (115 days x $2,250/day = $258,750); Material costs ($25,000). Other Costs: $15,000. DEQ Oversight costs (75 hrs x $200/hr = $15,000).

3.g. Plan to Measure and Evaluate Environmental Progress and Results

The City will use Microsoft Excel and Project to track milestones and evaluate progress monthly, coordinating with the QEP and contractor. It will document outputs and other deliverables in quarterly progress reports in ACRES and via the cleanup final report. Measurement will compare quarterly achievement to output/outcome goals so that progress can be evaluated and milestone deviations can be identified and corrected as they occur in conjunction with the City's EPA Region 10 Project Manager. Anticipated outputs are described in Section 3b. Anticipated outcomes and environmental results that the City will track include removal and disposal of 2,600 tons of concrete and asphalt and 7,243 tons of contaminated soil (see 3.a.), reduction of the threat posed to humans and the environment, protection of groundwater and soil from contamination spread, reduced pollution in stormwater runoff, and square feet of land prepared for reuse. It will also track the number of cleanup jobs created, improved access to recreation facilities, and funding leveraged.

4. Programmatic Capability and Past Performance

PROGRAMMATIC CAPABILITY

4.a. Organizational Structure and 4.b Description of Key Staff

PP&R's Capital Development Group consists of three program managers and 15 project managers with expertise in landscape architecture, engineering, architecture, and construction management. Key staff include **Jane Alexander**, who will serve as Project Manager through remediation and reuse design and construction. She has 35 years of experience guiding complex park projects through design, construction document development and construction management. Overall grant management and daily remediation operations will be performed by Environmental Risk Specialist **Alex Shook,** who will be the environmental project manager overseeing the remediation work. Alex has been with PP&R for over 3 years, and has 20+ years of experience managing environmental assessment and remedial cleanup projects. Alex will be the primary point of contact with DEQ for all site assessment, remediation, and brownfield site management projects for the Bureau. Alex will collaborate with Portland's Brownfield Program Coordinator **Jenn Bildersee**. Jenn has worked with the Portland Brownfield Program for 17 years, has managed nine cooperative agreements with EPA, and has served as project manager on dozens of assessments and cleanups. **Antoinette Toku** has 13 years of experience providing grant award management, is a Financial Analyst with the City's Grants Management Division (GMD) and will act as a primary contact for program and financial reporting. **Maija Spencer** will guide Community Engagement. Maija has been with the city for over 20 years and is PP&R's Senior Community Engagement Coordinator. She will assist with appropriate public notification and community involvement activities over the course of the remediation and park development work. Other staff include **Ross Swanson**, PP&R's Capital Growth Program Manager, who will provide oversight for the project. Ross has a master's in landscape architecture and over 28 years of experience designing and delivering public projects. **Pauline Miranda**, with 21 years of experience in financial analysis, will provide financial support.

4.c. Acquiring Additional Resources

The City has the staff and procedures to successfully acquire services to complete the grant through a competitive, qualifications-based process compliant with 2 CFR 200.317-200.326. The City has received 3 EPA Brownfields grants in the past and has repeatedly demonstrated its ability to adhere to all federal requirements (see 4.d.(1)). The City's existing systems will support efficient staff transitions should the need arise, eliminating project delays and ensuring the implementation team maintains appropriate qualifications.

PAST PERFORMANCE AND ACCOMPLISHMENTS

4.d. Currently Has or Previously Received an EPA Brownfields Grant

4.d.(1) Accomplishments

The City of Portland was awarded EPA Brownfields Assessment Grants in 2011, 2016, and 2022. The outcomes of the 2011 Assessment grant included more than 50 acres assessed, with more than 25 of those acres contributed to parks, gardens, or open space, and more than 150 units of affordable housing. Following completion of the 2016 Assessment grant, outcomes included 11.3 acres of assessed land, petroleum and hazardous substances remediated, and 5 affordable housing projects creating 348 new units. As part of the 2022 Assessment grant, outcomes included 28.89 acres of assessed land, petroleum and hazardous substances remediated, 2 shelter and transitional housing projects created/preserved serving 410 residents, and 296 units of affordable housing created/preserved. All outputs and outcomes are accurately reflected in ACRES.

4.d.(2) Compliance with Grant Requirements

The City's repeated success as a state and federal grantee demonstrates its successful expenditure of grant funds consistent with all grant requirements. The City of Portland was fully compliant with the workplan schedule and terms and conditions of the 3 EPA Brownfields Assessment Grants awarded in 2011, 2016, and 2022. The City successfully met quarterly performance deliverables and fully updated the ACRES files in a timely and complete manner. Timely and acceptable quarterly reporting was 100%. For the 2011 and 2016 grants, all funds were fully dispersed for activities as described in the Cooperative Agreement, and no funds remained at the time of closing. Regarding the 2022 Assessment Grant, over 70% of the funds have been drawn down, and the remaining amount has been allocated to incoming projects.

Threshold Criteria for Cleanup Grants – City of Portland
Funding Opportunity Number: EPA-I-OLEM-OBLR-25-07

(1) Applicant Eligibility

a. City of Portland is a General-Purpose Unit of Local Government, eligible for funding.

b. City of Portland is not exempt from Federal 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 applicant does not have an open EPA Brownfields Multipurpose Grant.

(4) Site Ownership

The applicant is the current and sole owner of the site as of August 1, 2025. The applicant will retain ownership of the site for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of the site.

(5) Basic Site Information

a) Block 290 East, also known as Slabtown property, or Consolidated Freight

b) Northwest corner of NW Pettygrove Street and NW 20th Avenue, Portland, OR 97209

(6) Status and History of Contamination at the Site

a) Hazardous substances are the predominant contaminant on the site. Petroleum is also present.

b) Initially developed in 1901, the Site featured residential structures, which remained until their removal between 1944 and 1950. During this period, the Site underwent significant changes, being redeveloped as the Consolidated Auto Truck Service and Parking facility. The new development included multiple buildings such as a truck shop, offices, a truck-greasing building, and truck scales. An office building and dry ice storage facility were also present on the southeastern portion of the Site in 1955. By 1967, these structures were removed, and a truck maintenance facility was constructed known as the former Consolidated Freightways truck maintenance building. The truck maintenance facility was comprised of an east shop located on Block 290 East (the Site), and a west shop located on the adjoining Block 290 West parcel. The previous facility had 39 service bays located

on the north and south sides of the building. Twenty-two of the service bays were located in the east truck shop, within the Site. In the east truck shop the service bays consisted of lube pits allowing access underneath the trucks while they were in the shop.

The building was demolished in 2020 and since that time, the Site has largely remained vacant, with brief usage as a construction staging area for a new multi-family residential building adjoining the western and northern Site boundaries.

c) Under an existing Oregon Department of Environmental Quality Prospective Purchaser Agreement, the City of Portland is required to address arsenic contamination in soil through a combination of capping and/or removal. Arsenic was found to be elevated throughout the site in surface (0-3 ft) and subsurface (3-15 ft) soils above both DEQ's risk-based concentrations for human health exposures and regional background levels for the Portland Basin. Petroleum contaminated soils are also present along the eastern edge of the property at NW 20th Ave, associated with a historical fuel dispensing area.

d) The site became contaminated over a long period of industrial use as a truck maintenance facility as well as from naturally occurring arsenic in the soil. Up to 14 USTs were reported to have been installed at the Consolidated Freightways truck maintenance building, including six associated with the west truck shop and eight associated with the east truck shop (Site). The eight onsite USTs were removed in November 1995 from the south side of the eastern truck shop and included: one 30,000-gallon diesel UST; one 20,000-gallon diesel UST; one 10,000-gallon motor oil UST; one 5,000-gallon antifreeze UST; one 2,500-gallon waste oil UST; one 1,500-gallon waste oil UST; one 1,000-gallon gear oil UST; and one 1,000-gallon antifreeze UST, previously stored non-halogenated petroleum-based solvent.

Based on data collected during the 1995 UST decommissioning, a subsurface investigation was conducted in 1996 to investigate the Former UST Fill Port Area. Total petroleum hydrocarbons (TPH) were detected in samples collected from the 10 to 12 feet below ground surface (bgs) along the eastern edge of the property.

Arsenic was found to be elevated throughout the site in surface (0-3 ft) and subsurface (3-15 ft) soils above both DEQ's risk-based concentrations for human health exposures and regional background levels for the Portland Basin. Petroleum contaminated soils are also present at approximately 5-10 ft below the ground surface along the eastern edge of the property at NW 20th Ave, associated with a historical fuel dispensing area.

(7) Brownfield Site Definition

a) The site is not listed or proposed for listing on the National Priorities List.

b) The site 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.
c) The site is not subject to the jurisdiction, custody, or control of the U.S. government.

(8) Environmental Assessment Required for Cleanup Grant Applications

A written Subsurface Investigation report (equivalent Phase II environmental site assessment report) was completed prior to application submission, on February 19, 2025.

Previous subsurface investigations include:

- 1995 UST decommissioning
- 1996 subsurface investigation to investigate the Former UST Fill Port Area
- 1999 Phase I Environmental Site Assessment and Limited Asbestos Survey, and Groundwater Sampling
- 2013 Phase I Environmental Site Assessment
- 2024 Phase I investigation

(9) Site Characterization

a) N/A, Applicant is not a State or Tribal Environmental Authority.

b) i. A current letter from the appropriate State Environmental Authority, the Oregon Department of Environmental Quality, is attached. The letter is for the FY26 Cleanup Grant application and not a previously submitted application. The letter:

a. Affirms that the site is eligible to be enrolled in the state voluntary response program.
b. Indicates that the site is eligible and enrolled in the state voluntary response program.
c. Indicates the site has had a sufficient level of site characterization for the remediation work to begin.

ii. N/A, additional assessment is not needed to sufficiently characterize the site for the remediation work to begin.

c. N/A, site is eligible to be enrolled in a voluntary response program.

(10) Enforcement or Other Actions

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

(11) Sites Requiring a Property-Specific Determination

The site does not need a Property-Specific Determination.

(12) Threshold Criteria Related to CERCLA/Petroleum Liability

The predominant contaminant is hazardous substances.

a. Property Ownership Eligibility–Hazardous Substance Sites

i. N/A

ii. N/A

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

The applicant was a bona fide prospective purchaser (BFPP):

(1) Applicant is asserting the BFPP liability protection:

• The owner acquired title to a property after January 11, 2002.

• The owner conducted all appropriate inquiries (AAI) prior to acquiring the property, demonstrated by completion of a Prospective Purchaser Agreement under oversight by DEQ. This agreement states: DEQ and Respondent intend for this Consent Order to be construed as an administrative settlement by which Respondent has resolved its liability to the State of Oregon, within the meaning of Section 113(f)(2) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9613(f)(2), regarding Existing Hazardous Substance Releases, and for Respondent not to be liable for claims for contribution regarding Existing Hazardous Substance Releases to the extent provided by Section 113(f)(2) of CERCLA, 42 U.S.C. §§ 9613(f)(2).

• The owner is not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination.

• All disposal of hazardous substances at the site occurred before acquisition of the site.

• The owner has exercised appropriate care by taking reasonable steps to address releases, including stopping continuing releases and preventing threatened future releases and exposures to hazardous substances on the site.

• The owner has complied with any land use restrictions and not impeded the effectiveness or integrity of any institutional controls associated with response actions at the site.

• The owner has and will continue to provide full cooperation, assistance, and access to authorized persons.

• The owner has and will continue to comply with any CERCLA information requests and administrative subpoenas and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.

• The owner has not and will not impede performance of a response action or natural resource restoration.

Demonstrate that the applicant meets the requirements for the BFPP CERCLA liability protection.

(a) Information on the Property Acquisition

(i) Property was acquired through a donation agreement with the former property owner.

(ii) Property was acquired August 1, 2025.

(iii) the owner has fee simple ownership

(iv) Property was acquired from Block 290, LLC.

(v) there are no familial, contractual, corporate, or financial relationships or affiliations between the owner and all prior owners or operators, or other potentially responsible parties, of the property including the person or entity from which we acquired the property.

(b) Pre-Purchase Inquiry

(i) Types of assessments performed

- An ASTM E1527-21 Phase I investigation was completed August 27, 2024. This assessment was performed for the City of Portland.
- A Subsurface Investigation (Phase II) was completed February 19, 2025. This assessment was performed for the City of Portland.

(ii) The AAI investigation / Phase I environmental site assessment was performed by an Environmental Professional as defined in 40 CFR § 312.10 and the required declaration by the environmental professional is included in a written report per 40 CFR § 312.21(d).

(iii) The original AAI investigation or Phase I environmental site assessment was conducted more than 180 days prior to the date City of Portland acquired the property. Equivalent updates were conducted within 180 days prior to acquisition of the property in the form of:

1. **Interviews and ongoing communication with owners, operators, and occupants.** City staff had ongoing communications with the previous (then current) property

owner throughout the Phase II site investigation activities regarding their understanding of site history and subsurface infrastructure, and to ensure that the site was secured and that no further activity of any kind was taking place that could cause or contribute to further contamination.

2. **Interviews and Ongoing Communication with Oregon Department of Environmental Quality**

   Communications were taking place weekly to monthly between City staff and Oregon DEQ regulators during development of the Prospective Purchaser Agreement (PPA) Scope of Work right up to just days before property acquisition to ensure accurate understanding of site conditions and maintenance of protective measures. Communications are ongoing today between City staff and DEQ regarding implementation of the PPA Scope of Work with quarterly updates being provided at a minimum.

3. **Searches for recorded environmental cleanup liens.** As part of its approval of closing documents for the acquisition of the Block 290 Property and to ensure there were no new exceptions on title since the previous title report dated August 27, 2024, the City reviewed all encumbrances on title in July 2025, less than 30 days before closing on August 1, 2025. No environmental liens were found on title.

4. **Reviews of federal, tribal, state, and local government records.** There were ongoing discussions and reviews of Oregon DEQ files and records for this site following submittal of the Subsurface Investigation Report (February 19, 2025) and during development of the PPA Scope of Work which was finalized in July 2025.

5. **Visual inspections of the subject property and of adjoining properties.** Visual inspections of the property have been ongoing since completing the Phase I Investigation. Inspections/site visits continued through the Phase II activities and the City continues to inspect the site for security and vegetation overgrowth as part of standard property maintenance. These inspections are conducted a minimum of once per month. The site is secured with a chain link fence and locking gate to prevent public access and illegal dumping or disposal of hazardous substances.

6. **The declaration by the Environmental Professional responsible for the assessment or update.** The declarations of the environmental professionals were included in the Phase I ESA (August 2024). An environmental professional and State of Oregon Professional Geologist from the same consulting firm who provided the Phase I declaration also signed and stamped the Phase II report, dated February 19, 2025, less than 180 days before property acquisition. The same consulting firm also

assisted in preparing the draft PPA scope of work, which was approved by DEQ in July 2025, less than 30 days before acquisition.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the site occurred before City of Portland acquired the property, and owner has not caused or contributed to any release of hazardous substances at the site. Owner has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

Property has been vacant since acquisition.

(e) Continuing Obligations

(i) There are no continuing releases occurring on the property. All former infrastructure was removed prior to acquisition.

(ii) The site is secured with a chain link fence and locking gate to prevent public access and illegal dumping or disposal of hazardous substances that could change the site's environmental condition.

(iii) The site is secured with a chain link fence and locking gate to prevent public access.

(i) Owner is complying with any land use restrictions and not impeding the effectiveness or integrity of any institutional controls;

(ii) Owner is assisting and cooperating with those performing the cleanup and providing access to the property;

(iii) Owner is complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and

(iv) Owner is providing all legally required notices.

b. Property Ownership Eligibility – Petroleum Sites

(1) Current and Immediate Past Owners

The current owner is the City of Portland (the applicant). The former owner is Block 290, LLC.

(2) Acquisition of Site

The City of Portland acquired the site on August 1, 2025, through a donation agreement with Block 290, LLC.

(3) No Responsible Party for the Cleanup of the Site

(i) Neither the current owner (applicant) nor the immediate past owner (Block 290, LLC) dispensed or disposed of petroleum or petroleum product contamination or exacerbated the existing petroleum contamination at the site.

(ii) Neither the current owner (applicant) nor the immediate past owner (Block 290, LLC) owned the site when any dispensing or disposal of petroleum (by others) took place.

(iii) Both the current owner (applicant) and the immediate past owner (Block 290, LLC) took reasonable steps with regard to the contamination at the site.

(4) Cleaned Up by a Person Not Potentially Liable

Neither the current owner (applicant) nor the immediate past owner (Block 290, LLC) dispensed or disposed of petroleum or petroleum product, or exacerbated the existing petroleum contamination at the site. Both the current owner and the immediate past owner took reasonable steps with regard to the contamination at the site.

(5) Judgments, Orders, or Third-Party Suits

No responsible party (including the applicant) is identified as potentially liable for cleaning up the site, through either:

(a) a judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the site; or

(b) an enforcement action by federal or State authorities against any party that would require any person to assess, investigate, or clean up the site; or

(c) a citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner of the site (or where a UST(s) is involved, the current or immediate past owner of the UST(s)), that would, if successful, require the assessment, investigation, or cleanup of the site.

(6) Subject to RCRA

The site is not subject to any order under § 9003(h) of the Solid Waste Disposal Act.

(7) Financial Viability of Responsible Parties

Neither the current nor immediate past landowners have been identified as responsible for the contamination at the site.

(13) Cleanup Authority and Oversight Structure

a. The site is already enrolled in the state response program and will remain under ODEQ oversight through the duration of work funded by this grant.

b. Access to neighboring properties will not be necessary to conduct the cleanup, perform confirmation sampling, or monitor offsite migration of contamination.

(14) Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

A Draft Analysis of Brownfield Cleanup Alternatives is attached. It summarizes information about:
•the site and contamination issues, cleanup standards, and applicable laws;

•the cleanup alternatives considered, including information on the effectiveness, the ability of the applicant to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness, and

•the proposed cleanup.

If the application is selected for funding, owner will finalize the ABCA and make it available for additional public review and comment as part of the pre-cleanup activities.

b. Community Notification Ad

The applicant has published a community notification ad in the manner customarily used to communicate to our target communities on January 12, 2026.

The community notification ad clearly states:

• that a copy of the grant application, including the draft ABCA, is available for public review and comment;

• how to comment on the draft application;

• where the draft application is located; and

• the date, time, and location of the public meeting.

All target communities, including community members with limited English proficiency and community members with disabilities, have received the notification and been provided an opportunity to comment on the application.

c. Public Meeting

The applicant held a public meeting to discuss the draft application and consider public comments prior to the submittal of this application. The public meeting was held virtually on January 21, 2026, and was accessible to persons with limited English proficiency and persons with disabilities.

d. Submission of Community Notification Documents

The applicant has attached the items listed below to the application submitted to EPA:

• a copy of the draft ABCA;

• a copy of the posting that demonstrates solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application was submitted to EPA.

• the comments or a summary of the comments received;

• the applicant's response to those public comments;

• summary from the public meeting(s); and

• meeting sign-in sheet/participant list.

(15) Contractors and Named Subrecipients

• **Contractors**.

N/A, a contractor has not been procured at the time of application submission.

• **Named Subrecipients**.

N/A, a subrecipient is not named at the time of application submission.

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

January 22, 2026 *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 Acknowledgement – City of Portland Parks & Recreation
FY26 EPA Brownfield Cleanup Grant Application

Terri,

The Oregon Department of Environmental Quality (DEQ) acknowledges and supports the FY26 EPA Brownfield Cleanup Grant Application for the City of Portland Parks & Recreation for the 1.06-acre property located at the northwest corner of NW Pettygrove Street and NW 20th Avenue, Portland, Oregon (Site) and referred to as the Block 290 East property. The Property is contaminated by historic industrial uses including a truck service and maintenance facility. Underground storage tanks and truck service operations have contributed to site contamination, along with sitewide elevated arsenic. To ensure site conditions are protective for planned recreational use, the cleanup grant funds will be used to address contaminants by implementing the selected remedy.

The Block 290 East property is enrolled in DEQ's voluntary response program and investigations have been conducted under DEQ's Cleanup Program oversight and under a Prospective Purchaser Agreement with DEQ, executed prior to acquisition. Several environmental investigations have been conducted that have identified risk to future site users and, thereby, impedes recreational reuse as a community park. Therefore, DEQ affirms that a sufficient level of site characterization has been completed to allow for remediation of the Property to begin.

Portland Parks & Recreation is supported by the City of Portland Bureau of Environmental Services who has demonstrated prior stewardship of Brownfield Grant funds through various EPA Brownfield Community-Wide Assessment and Cleanup Grants. DEQ recognizes the vital role brownfield redevelopment plays in promoting economic stability and the protection of human health and the environment. Therefore, DEQ encourages EPA to fund the approximate $2 million Cleanup Grant Application from the City of Portland. Please contact Kara Master, DEQ's Northwest Region Brownfields Coordinator, at (503) 229-5585 if you have any questions.

Sincerely,

Amanda Wozab

Amanda Wozab (she/her)
Northwest Region Cleanup Section Manager

Ecc: Kara Master, DEQ NWR Brownfield Coordinator
Brian Church, DEQ NWR Toxicologist/Cleanup Project Manager
Alex Shook, Portland Parks & Recreation