



EPA Brownfield Cleanup Grant Narrative Information Sheet

1. Applicant Identification:

City of Hillsboro
150 E. Main Street
Hillsboro, Oregon 97123-4028

2. Website URL:

<https://www.hillsboro-oregon.gov/>

3. Funding Requested:

- (a) Grant Type: Single Site Cleanup
- (b) Federal Funds Requested: \$2,497,280

4. Location:

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

5. Property Information

The Rock Creek Terrace property is identified as tax lot number 1S209BC01100, and is located at 3080 SE River Road, Hillsboro, OR 97213.

6. Contacts:

(a) Project Director:

Ken Christian
Business Development Liaison
City of Hillsboro
503.681.5267
Ken.Christian@hillsboro-oregon.gov
150 E. Main Street
Civic Center

Hillsboro, Oregon 97123-4028

(b) Chief Executive/Highest Ranking Elected Official:

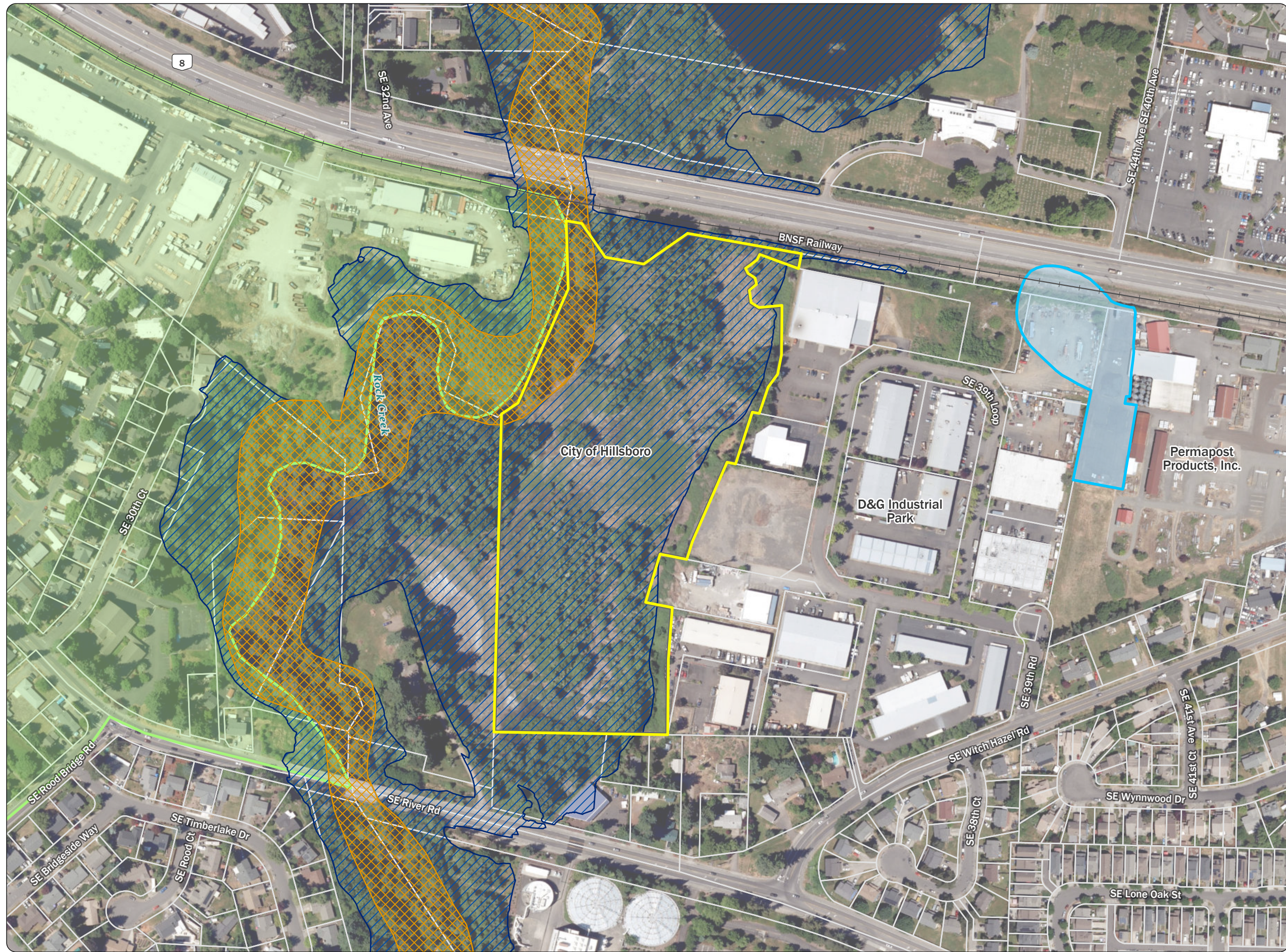
Beach Pace
Mayor
City of Hillsboro
503.681.6219
150 E. Main Street
Civic Center
Hillsboro, Oregon 97123-4028

7. **Population:** City of Hillsboro: 106,447 U.S. Census population

8. **Other Factors:**








| Other Factors | Page # |
|---|---------------|
| Community population is 15,000 or less. | |
| The applicant is, or will assist, a federally recognized Indian tribe or United States territory. | |
| The proposed brownfield site(s) is impacted by mine-scarred land. | |
| 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. | |
| The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them). | Yes, page 1. |
| The proposed site(s) is in a federally designated flood plain. | Yes, page 1. |
| The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | |
| The reuse of the proposed 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. | Yes, page 2. |
| The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing. | |

9. **Releasing Copies of Applications:** NA



**Figure
Site Map**
Rock Creek Terrace Property
Hillsboro, OR

Legend

-  Permapost RCRA Corrective Action Area
-  FEMA Floodway
-  FEMA Special Flood Hazard Area (100-year)
-  Adjacent Low-Income Community
-  Rock Creek Terrace Property
-  Tax Lot
-  Railroad

Notes

EPA = Environmental Protection Agency.
 FEMA = Federal Emergency Management Agency.
 Permapost = Permapost Products, Inc.
 RCRA = Resource Conservation and Recovery Act.



Data Sources

Aerial photograph (2023) obtained from City of Portland; tax lot data (2024) obtained from Oregon Metro; disadvantaged community data (2024) obtained from the Environmental Protection Agency's EJScreen; flood zone data (2024) obtained from the Federal Emergency Management Agency (FEMA).



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1. Project Area Description and Plans for Revitalization

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

The City of Hillsboro (the City) is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Grant to remediate the Rock Creek Terrace (the Site) in Hillsboro, Oregon. The Target Area covers a half-mile radius around the Site and includes portions of census tracts 41067032302, 41067032503, 41067032412, 41067032410, and 41067032404 in Washington County, Oregon.¹

The Target Area surrounding the Site includes developed areas with residential neighborhoods, Rock Creek and adjacent floodplain habitat, the D&G industrial park, the Permapost facility, a railroad line, and the Tualatin Valley Highway (see Attachment 2 for a Figure). The Target Area contains two contaminated sites: the Site and a DEQ-listed facility in the D&G Industrial Park stemming from historic chromium releases. Key challenges include 3.5 acres of contamination in the 15 acre Rock Creek floodplain, which poses human health risks and blocks regional habitat restoration and recreational access goals along the creek. An EPA Cleanup grant would fund site remediation, unlocking these stalled restoration efforts and broader public health, recreational, and environmental benefits.

b. Description of the Proposed Brownfield Site

The Site, Rock Creek Terrace, tax lot 1S209BC01100 at 3080 SE River Road in Hillsboro, Oregon, is approximately 15 acres adjacent to Rock Creek, and is undeveloped and vegetated with grass, trees, and brush. It is a floodplain and wetland habitat that is severely overgrown with invasives (such as Himalayan blackberry) and is largely inaccessible to the public. Rock Creek meanders along the western portion of the Property and discharges south to Tualatin River. The Hillsboro Comprehensive Plan designates the Property as floodplain land use.² The Property is further identified as a clean water services sensitive area by the City; is part of the FEMA 100-year floodplain; and is designated a habitat benefit area.

The Site is heavily contaminated with hazardous substances—including dioxins and heavy metals (arsenic, copper, chromium)—identified during DEQ-overseen investigations. These stem primarily from historic wood-treating operations at the nearby Permapost facility, which used pentachlorophenol (with dioxin impurities) and metal preservatives to fulfill Department of Defense Vietnam War contracts, US Forestry pole orders, and other needs. Contaminants migrated 800 feet westward via stormwater discharges into a drainage ditch that crossed the Site, overflowing seasonally into low-lying areas. Permapost operates under a RCRA post-closure permit (ORD 009 041 187, 2008–2018; renewal on hold pending DEQ Record of Decision) and current interim status (RCRA Part 265).

The lateral and vertical extent of dioxin and metal contamination has been delineated as summarized in the 2019 Permapost Resource Conservation and Recovery Act Permit Focused Remedial Investigation Report, a 2021 Supplemental Investigation Report, a 2023 revised Conceptual Site Model memorandum, and a DEQ 2025 Recommended Remedial Action Staff Report (ECSI Cleanup ID 0148). There are two primary areas of contamination at the Site:

- **Drainage cut.** The drainage cut (approximately 0.5 acres) has ten times the dioxin concentrations relative to all concentrations within the Property. Soil results exceeded the ecological screening criteria for dioxins, arsenic, chromium, and copper. Concentrations are more than 100 times greater than risk-based levels protective of ecological receptors, reflecting significant potential impacts to populations that rely on floodplain habitat.
- **Terrace.** South of the drainage cut, approximately 3 acres of the Rock Creek Terrace shows elevated dioxin concentrations that exceed ecological risk-based levels. These concentrations in the low-lying areas reflect stormwater overflow from the drainage cut and deposition. The extent of impacts has been delineated.

Source control measures have been completed to ensure recontamination to the Site is prevented. Feasibility analysis for cleanup has been completed under DEQ oversight. Removing dioxins and metals contamination from the floodplain improves habitat, offers environmental and public health benefits by reducing exposure to contaminants and enhancing public recreational access.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

The project restore three acres for public recreational access in an area adjacent to a disproportionately impacted community. The City purchased the purchased Site in Rock Creek Terrace in 2010 to expand the regional trail network.³ Currently managed by City Parks and Recreation, the Site is a riparian habitat that is not developed or used for public access due to safety concerns from contaminants. Following remediation, it will be incorporated

¹ U.S. Census Bureau, U.S. Department of Commerce. (n.d.) 2020 Census Demographic Data Map Viewer. Retrieved January 21, 2025 from: <https://maps.geo.census.gov/ddmv/map.html>

² City of Hillsboro. 2024. Hillsboro Comprehensive Plan. <https://www.hillsboro-oregon.gov/home/showpublisheddocument/16832/638581881286530000>

³ City of Hillsboro. 2015. Trails Master Plan. <https://www.hillsboro-oregon.gov/home/showpublisheddocument?id=8296>

into the [Crescent Park Greenway](#), a regional effort by the City to connect green spaces within the larger community by creating a 16-mile trail and corridor.⁴ The site reuse supports a key community revitalization effort that will connect parks and natural areas, expand recreational opportunities, and improve safe public access to open space. The site reuse will also provide for floodplain habitat restoration.

Restoring the floodplain habitat will improve ecosystem health, water quality, flood control, and carbon sequestration. The Site is designated as a “sensitive environment” under OAR 340-122-115(50), indicating it holds significant ecological value. The Site is also in a federally designated floodplain. The reuse strategy addresses these designations through Site remediation, which will reduce the chance that contaminants enter the watershed. Additionally, the site reuse strategy will re-naturalize the habitat, and replace invasive species such as Himalayan blackberry with native species, which have deeper root systems that are more effective at preventing erosion and will create a more resilient flood plain ecosystem.⁵

The City has been responsive to the community in developing the strategy that aligns with the revitalization and community plans listed below. More than 4000 people attended meetings and 1000 surveys were received. The Washington County Chamber of Commerce and County Board of Commissioners were engaged and provided letters of support.

The City has developed multiple plans and active restoration initiatives, particularly along Rock Creek, that support broader regional goals for the Tualatin River Watershed. The reuse strategy is consistent with local revitalization plans and advances the following goals and policies:

- A master plan to create a 16-mile trail and corridor along the north, west, and south periphery of Hillsboro (Crescent Park Greenway Plan, approved as a priority by the City in 2018).⁴
- Foster the provision of land for open space and recreation for new and existing residents (Housing Policy 3.12, Comprehensive Plan, 2024).²
- Protect and enhance the function, quality, and diversity of the City’s natural resources and ecosystems. This includes areas critical to ecosystem and watershed function, such as flood plains and riparian areas (Natural Resources Goal 1, Comprehensive Plan, 2024).²
- Protect habitat for fish and wildlife species (Natural Resources Goal 2, Comprehensive Plan, 2024).²
- Protect natural resources as shared and critical community assets, which includes providing access to the community to natural resources (Natural Resources Goal 6, Comprehensive Plan, 2024).²
- Protect and restore connected habitats and build a healthy tree canopy ([Tree for All](#) initiative, a group partnering with the City, Clean Water Services, the Tualatin Soil and Water Conservation District, and Metro).⁶

d. Outcomes and Benefits of Reuse Strategy

The City’s reuse strategy focuses on remediating contamination, restoring floodplain habitat, and creating safe public access to the Site, as described in Section 1.b. The reuse strategy is to restore an area including a 400 foot waterfront that is part of the regional trail system plan, which aligns with and advances the City’s Community and Comprehensive Plans and multiple local and regional initiatives, by as indicated in Section 1.c. The outcomes and benefits of the City’s plans include:

- **Increased economic vitality and community investment:** Post-cleanup, the Site will become a safe greenspace that serves as a foundation for future trails and recreational amenities. This transformation into a community asset will increase the area’s appeal for neighboring residents, nearby industrial workers, and visitors, increasing foot traffic and visitation that benefits nearby businesses. The City commonly measures foot traffic changes in redeveloped greenspaces as a proxy for increased economic benefit. Improved environmental conditions and future connectivity to the local trail systems can also stimulate redevelopment of adjacent properties, raise property values, and encourage investment in complementary uses. Construction and restoration activities will also generate short-term jobs, contributing to immediate economic activity.
- **Expanded safe, accessible green space for community health:** The project will remediate and restore three acres for public access in an area adjacent to a disproportionately impacted community. This neighborhood includes households with lower median incomes and limited access to safe outdoor recreation spaces. By creating walkable green space and future trail connections, the project provides opportunities for physical activity and stress reduction, which are linked to improved mental and physical health outcomes. These benefits are especially important for populations that experience higher rates of chronic health conditions and limited transportation options.

⁴ City of Hillsboro. 2018. Crescent Park Greenway Concept Plan. <https://www.hillsboro-oregon.gov/home/showpublisheddocument/22231/637636626501130000>

⁵ Bennett, Max. 2006. Managing Himalayan Blackberry in western Oregon riparian areas. Oregon State University. https://ir.library.oregonstate.edu/concern/open_educational_resources/0r967408h

⁶ Tree for All. 2026. A Bold New Vision for 2040. Retrieved January 21, 2026: <https://storymaps.arcgis.com/stories/8f5cd5ab0a0944de8d968df804e3684a>

- **Reduced human health risks from contaminated soil and water:** Removal of dioxins and heavy metals will reduce exposure for residents through direct contact and dust inhalation; improved water quality in Rock Creek will support safer recreation and reduce downstream health hazards, decreasing long-term public health risks tied to polluted environments.
- **Improved aquatic and terrestrial habitat quality and biodiversity:** The Site borders Rock Creek, which provides critical rearing habitat for federally threatened Coho and Chinook salmon. Coho and Chinook salmon are keystone species in Pacific Northwest ecosystems because they transport nutrients to rivers and forests upon spawning and dying and sustain wildlife food webs; their decline threatens biodiversity and regional fisheries. Habitat restoration of three acres of riparian habitat along Rock Creek will improve fish and aquatic health by enhancing rearing and spawning areas for native species, including threatened salmonids, and support long-term biodiversity and water quality. It will also provide protectiveness for terrestrial ecological receptors such as songbirds and riparian mammals by eliminating toxins from soil and vegetation, reducing food-chain exposure and creating safer habitats that support biodiversity and ecosystem resilience.
- **Increased resilience to flooding and extreme weather events:** Restoration of approximately 400 linear feet along Rock Creek within the FEMA-designated 100-year floodplain will improve flood management and habitat conditions. Temporary ponded areas will be restored through contaminant treatment and removal, reducing standing water that can exacerbate flood risk and improving water quality (i.e., by reducing contaminant concentrations in soil and surface water and improving turbidity and dissolved oxygen levels). Increasing species diversity in riparian zones will help build ecosystem resilience to extreme weather events such as flooding by creating a more complex and interconnected habitat structure.
- The reuse strategy does not include renewable energy generation or energy efficiency measures.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

The site characterization is complete and sufficient for remediation to proceed, as confirmed by a letter from the Oregon DEQ.

f. Resources Needed for Site Remediation

EPA funds are expected to fully cover cleanup costs. No additional resources are required for site remediation.

g. Resources Needed for Site Reuse

For site reuse as greenspace and trail development, the City has programmed a budget of approximately \$28 million as part of the Crescent Park Greenway Plan to support these initiatives. However, the budget does not accommodate Site cleanup costs. Funds will be appropriated for specific projects as they advance, ensuring resources are in place for the ongoing development of this project area.

h. Use of Existing Infrastructure

Existing infrastructure (including developed roads in the D&G industrial park) will be used for access to support the planned work for the proposed cleanup. No new or permanent infrastructure is needed for site reuse.

2. Community Need and Community Engagement

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

The City of Hillsboro's population has grown rapidly, from 5,000 in 1950 to over 110,000 today. This growth challenges greenspace preservation and housing affordability. At the same time, economic disruptions, including over 3,100 layoffs, or 5% of the workforce, in the local technology sector in 2025, threaten the city's economic growth and raised concerns about reduced tax revenues. These recent challenges also constrain the City's capacity to fund land acquisition and capital improvements. Hillsboro's economy is heavily dependent on Intel as a single major employer, making the community vulnerable to economic shocks and underscoring the need to diversify assets and attract investment beyond the tech sector.

As outlined in the City's 2035 Community Plan, integrating greenspaces near housing are top priorities. The City has programmed approximately \$28 million within its Crescent Park Greenway Plan for trail design, construction, and related improvements, but this does not include Site cleanup costs that must be funded separately. Securing an additional \$2.5 million for cleanup is not feasible, as this would require reprogramming from other priorities, new revenue, or supplemental appropriations amid a constrained fiscal environment with slowing property tax growth, inflation pressures, and competing demands for public safety, housing, and infrastructure. Hillsboro faces tight 2026-28 budgets with limited discretionary funds after bond measures and grants are allocated, making unbudgeted environmental liabilities infeasible absent external funding such as EPA brownfields grants. Further delay of remediation would threaten continued exposure to nearby residents and visitors who may access the Site via unauthorized access points.

The Target Area includes the communities most likely to be affected. The City has one of the most ethnically diverse communities in the state of Oregon, and the Target Area itself has a higher proportion of non-English

speakers than the City.⁷ Economic data show that the poverty rate in the Target Area is similar to that of Hillsboro, both of which are much higher than the Washington County poverty rate, and the unemployment rate in the Target Area exceeds that of the City of Hillsboro, Washington County, and USA (Table 1). Table 1 also shows that the percentage of people without a high school diploma is 3 times higher than Washington County, and nearly double that of the U.S. Low educational attainment produces effects such as limited employment, negative health effects, low wages, and poverty.⁸ Similarly, the amount of non-English speaking households is higher than the City of Hillsboro and the U.S. Language barriers can result in negative health outcomes.⁹

The two Target Area census tracts closest to the Site are also the most economically disadvantaged, and show heightened economic distress when compared to the Target Area, Hillsboro, Washington County, and the USA. The per capita income in the disproportionately impacted community is \$33,301, which is significantly below regional and national numbers, and the poverty rate is 14.5%, above that of the Target Area, Hillsboro, Washington County, and the USA (Table 1). Residents in these census tracts may be at a higher risk of exposure due to their proximity to the Site than other parts of the Target Area.

| Indicator | Target Area | Low-Income Population | Hillsboro | Washington County | USA |
|-----------------------------|-------------|-----------------------|-----------|-------------------|-------------|
| Population | 3,185 | 7,773 | 106,447 | 611,272 | 340,110,988 |
| Poverty Rate | 10.3% | 14.5% | 10.2% | 8.4% | 12.1% |
| Unemployment Rate | 6% | 4.6% | 5% | 5% | 5% |
| Per Capita Income | \$56,904 | \$33,301 | \$49,725 | \$52,136 | \$43,289 |
| Total Non-English | 33% | 27.1% | 30.1% | 37% | 23% |
| Without High School Diploma | 21% | 19% | 8% | 7% | 11% |

Source: US Census Bureau 2020¹⁰

Notes: The population of target area is lower than the low-income population because it reflects the use of partial census tracts. The low-income population uses the full census tracts of the two census tracts immediately adjacent to the Site location.

The proposed project to remove contamination from and promote public access to the Site. The proposed project to clean up the Site is essential for providing open space and passive recreational opportunities in the disadvantaged areas within the Target Area and the immediately adjacent community with low-income (Table 1). Reusing the Site will connect recreational areas to the north and south, enhancing community access to green spaces. In addition, residents will benefit from a cleaner, healthier natural environment, supporting the overall well-being of the community.

b. Health or Welfare of Sensitive Populations

Within the Target Area, 5% of the population is under the age of 5. Children are particularly vulnerable to health risks associated with the contamination on the Site. Childhood exposure to dioxin/furans may lead to developmental issues, immune system damage, and increased cancer risk. Additionally, these chemicals can disrupt endocrine function, potentially affecting growth, hormonal balance, and cognitive development in children. Data provided by CDC PLACES within the Target Area identifies additional sensitive population health risk factors as summarized in Table 2 (see Section 2c). The Site remediation will remove potential exposures risks to children from dioxin/furans. The projected site reuse will also provide a benefit to children by providing children with access to the outdoors and recreation.

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

Overall, the residents within the Target Area experience above average rates of health risk factors compared to the City of Hillsboro and Washington County. Health data for the Target Area shows several conditions occurring at rates higher than state and national averages (see Table 2). Asthma prevalence in the target area (11.7%) exceeds the national average (7.7%) and is slightly above Oregon's rate (11.2%). Depression is notably elevated at 25.8%, compared to 24.6% statewide and 17.8% nationally, indicating a significant mental health burden. Cancer rates in the target area (7.1%) and Hillsboro (7.0%) are above the U.S. average of 5.4%. Heart disease in the Target Area (5.4%) is higher than Oregon's rate (3.7%) and slightly above the national average (5.0%).

⁷ City of Hillsboro. 2025. Demographic & Economic Data. Retrieved January 21, 2026: <https://www.hillsboro-oregon.gov/our-city/departments/economic-development/data-demographics/demographic-economic-data>

⁸ Office of Disease Prevention and Health Promotion. U.S. Department of Health and Human Services. 2024. Healthy People 2030-High School Graduation. Retrieved January 21, 2026: <https://odphp.health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/high-school-graduation>

⁹ Shamsi, Hilal, et al. 2020. Implications of Language Barriers for Healthcare: A Systemic Review. Oman Medical Journal. <https://pmc.ncbi.nlm.nih.gov/articles/PMC7201401/>

¹⁰ U.S. Census Bureau 2020. Retrieved January 21, 2026: <https://www.census.gov/>

Oregon residents have a higher exposure to particulate matter (PM 2.5) compared to their counterparts across the U.S. (Table 3). These exposures can have serious health impacts on those who experience them. According to the CDC, exposure to PM 2.5 can be associated with respiratory and cardiovascular problems, including asthma, bronchitis, and heart attacks, and can even lead to strokes or premature death.¹¹ Additionally, Oregon residents are exposed to air quality that is unhealthy for all groups more than twice as frequently as the U.S. average (Table 3). These exposure risks represent additional sources of environmental burden, and may contribute to the elevated asthma and heart disease levels found in the Target Area as described in Table 2.

Cleaning up the Site and converting it into greenspace addresses these health disparities by removing harmful contaminants that may contribute to long-term disease risk and creating a healthier environment for residents. Green space and trails promote physical activity, reduce stress, and improve air quality, which can help lower rates of asthma and support mental health in a community where depression is significantly above the national average.

Table 2. Sensitive Population Health Risk Factors in the Target Area

| | Target Area | City of Hillsboro | Washington County | Oregon | USA |
|---------------------|-------------|-------------------|-------------------|--------|-------|
| Asthma | 11.7% | 11.3% | 11.2% | 11.2% | 7.7% |
| Cancer | 7.1% | 7.0% | 7.0 | 7.6% | 5.4% |
| Depression | 25.8% | 25.1% | 25.1% | 24.6% | 17.8% |
| Heart Disease | 5.4% | 4.9% | 4.6% | 3.7% | 5% |
| Disabilities (2023) | 13.9% | 11.5% | 12.2% | 15.9% | 13.7% |

Source for Asthma, Cancer, Depression, and Heart Disease: CDC PLACES Local Data for Better Health¹² and Southern Oregon Data Hub¹³

Source for Disabilities: American Community Survey 2023 5-Year Estimates table S1810: Disability Characteristics¹⁴

Note: the Target Area was identified as inclusive of an area within half-mile radius of the Site, inclusive of multiple census tracts.

Table 3. Identifying Sensitive Populations in the Target Area

| | State | U.S. |
|--|-------|-------|
| Particulate Matter 2.5 (mcg per cubic meter) | 12.1 | 7.3 |
| Air Quality: Unhealthy Air Days for All Groups | 38 | 15 |
| Traffic Volume (vehicles per day) | 162 | 108 |
| Limited English-Speaking Households | 15.4% | 23% |
| Less Than High School Education | 7.7% | 10.2% |

Source: Air quality and traffic volume data retrieved from Oregon Communities Reporter and the University of Wisconsin's County Health Rankings & Roadmaps; data on high school education and English-speaking households retrieved from the US Census Bureau.

d. Economically Impoverished/Disproportionately Impacted Populations

The reuse strategy will reduce environmental threats to populations in the Target Area that are economically disadvantaged. The Site is immediately adjacent to a low-income population that has a per capita income of \$33,301 and a poverty rate of 14.5% (Table 1). The low-income population within the Target Area has the highest risk of interacting with the Site. Cleanup will remove the environmental threat of dioxins and metals that could otherwise leach into soil and water, reducing exposure risks for nearby residents.

The projected site use will create recreational green space, increasing the community's access to outdoor recreation. Outdoor activities are shown to lower the risk of heart disease and asthma.^{15,16} Residents in the Target area are within a 0.5 mile radius of the Site, meaning they can walk to a recreational site and experience these benefits and it will also provide recreational access to the low-income population adjacent to the Site. This addresses a threat within the community from elevated rates of heart disease, asthma, and depression by providing recreational access to residents to reduce their risk from these health threats.

The project will reduce and address a threat that impacts salmon, a species that has deep cultural importance to the descendants of Tualatin band of the Kalapuya Tribe, who became members of the Confederated Tribes of the Grand Ronde. Chinook and Coho salmon are federally threatened species. The location of the Site in a floodplain

¹¹ U.S. Environmental Protection Agency. 2025. Particulate Matter (PM) Basics. Retrieved January 21, 2026: <https://www.epa.gov/pollution/particulate-matter-pm-basics>

¹² Center for Disease Control. 2023. PLACES Local Data for Better Health. Retrieved January 21, 2026: <https://experience.arcgis.com/experience/22c7182a162d45788dd52a2362f8ed65>

¹³ Southern Oregon Data Hub. 2022. Retrieved January 21, 2026: <https://experience.arcgis.com/experience/dad3f8bb368a44ecbfff6aea7b1809683>

¹⁴ U.S. Census Bureau. 2023. American Community Survey 2023 5-Year Estimates table S1810: Disability Characteristics. Retrieved January 21, 2026: https://data.census.gov/table/ACSST1Y2024.S1810?q=Hillsboro+city,+Oregon+Health&t=Disability&g=050XX00US41067_1400000US4106703202,41067032404,41067032410,41067032412,41067032503

¹⁵ National Heart, Lung and Blood Institute. National Institute for Health. 2022. Physical Activity and Your Heart. Retrieved January 21, 2026: <https://www.nhlbi.nih.gov/health/heart/physical-activity/benefits>

¹⁶ American Lung Association. 2024. Being Active with Asthma. Retrieved January 21, 2026: <https://www.lung.org/lung-health-diseases/lung-disease-lookup/asthma/managing-asthma/asthma-and-exercise>

means that there is a risk of dioxins and heavy entering the watershed and impacting local salmon populations. In addition to dioxins being hazardous to wildlife, they can accumulate in food chains and impact people.^{17,18} For tribes in the Pacific Northwest, a threat to salmon is seen as a threat to the tribes themselves. The Kalapuya Tribe was denied federal recognition and treaty rights, a governmental policy that impacted their and their descendants' economic wellbeing. The Confederated Tribes of the Grand Ronde carry out significant restoration work in the broader watershed and as discussed in 1c. the project site will both reduce risks to salmon from dioxins and metals.

Collectively these data demonstrate that the community in the Target Area is disproportionately impacted compared to the state and country. The proposed project will reduce the health risks to people, including vulnerable populations, in the Target Area and promote opportunities for community members to enjoy green space, which will positively impact the overall health and well-being of people with low-incomes living immediately adjacent to the Site.

Community Engagement

e.-f. Project Involvement and Project Roles (2.e.-f.)

Table 4 identifies the local organizations and entities involved in the project and outlines their specific roles, including how each will participate in decision-making for the cleanup and future reuse of the Site.

Table 4. Project Involvement and Project Roles

| Organization/Entity/ Group Name | Point of Contact | Specific Project Role or Assistance Provided |
|---|---|---|
| City of Hillsboro – Community Liaison | Beatriz Medel Beatriz.Medel@Hillsboro-oregon.gov | Community Engagement Leader. Advertise community meetings via website, newsletters, and social media. Identify additional stakeholder groups (neighborhood associations, non-profits) and facilitate meetings with the public and share project updates. Solicit and respond to feedback via Engage Hillsboro |
| City of Hillsboro | Ken Christian Ken.Christian@hillsboro-oregon.gov | Project Lead. Provide liaisons with the community, advertise community meetings, share project updates around site reuse on its website and in its newsletter. |
| City Parks and Recreation | Jeroen Kok jeroen.kok@hillsboro-oregon.gov | Terrace property management, restoration planning |
| Oregon Department of Environmental Quality | Katie Daugherty Katie.DAUGHERTY@deq.oregon.gov | Regulatory oversight, technical assistance, and state coordination |
| Oregon Department of Environmental Quality | Kara Master master.kara@deq.state.or.us | Oregon NW Brownfields Coordinator |
| Washington County Chamber of Commerce | Josh Tompkins josh@wcchamber.org | Regional stakeholder group with mission to enhance economic, environmental, and human health |
| Washington County Board of Commissioners | Kathryn Harrington Chair@washingtoncountyor.gov | Regional stakeholder group whose broader goals include enhanced housing, health services, and recreation under a council-manager government structure |
| Business Oregon | Jerry Sorte jerry.sorte@biz.oregon.gov | Oregon Brownfield funding coordination |

g. Incorporating Community Input

The project's need and purpose reflect extensive input gathered during development of the City's 2035 Community Plan, which engaged more than 4,000 participants and collected over 1,000 survey responses. Building on this foundation, the City will prepare a Public Involvement Plan upon award notification. This plan will define the timeline, outreach strategies, and roles of community partners, including residents directly affected by the cleanup and local organizations. It will detail methods to stimulate meeting participation and seek meaningful community input. Outreach

The City will use a combination of in-person and alternative engagement methods to communicate project progress and gather input. Public meetings will be scheduled at key project milestones, and updates will be posted regularly on the City's website and social media channels. To provide an alternative to in-person engagement, the City will use Engage Hillsboro, a bilingual online platform that can feature surveys, discussion boards, and interactive tools for collecting feedback from the community. This platform offers a flexible way for community members to share input early in the planning process and participate at their own pace and convenience.

¹⁷ Cornell College of Veterinary Medicine. Dioxin & PCB Toxicosis. Retrieved January 21, 2026: <https://cwhl.vet.cornell.edu/system/files/public/cwhl-fact-sheets-pcbs-dioxin.pdf>

¹⁸ U.S. Environmental Protection Agency. 2025. Learn about Dioxin. Retrieved January 21, 2026: <https://www.epa.gov/dioxin/learn-about-dioxin>

The City will document all input and publicly post written responses on the project website. The City will document which feedback was incorporated and why and explain any input that could not be adopted. These summaries will be discussed in public meetings to demonstrate how community voices influenced decision-making.

A meeting to discuss this grant application, the status of the Site, proposed cleanup alternatives, and proposed future site use was held on January 13, 2026 and previously on November 12, 2024 for a FY25 application.

3. Task Descriptions, Cost Estimates, and Measuring Progress

a. Proposed Cleanup Plan

The proposed cleanup plan described in the ABCA reflects the DEQ-identified remedy as set forth in the Oregon DEQ 2025 Recommended Remedial Action Staff Report. Contaminated media at the Site is soil impacted by dioxins and heavy metals, primarily located within the Terrace area. The preferred remedial action includes:

- Clear and grub approximately 3.7 acres of habitat to remove existing vegetation, including invasive species.
- Excavate approximately 3,400 bulk cubic yards of contaminated soil from an area of about 1.3 acres.
- Transport and dispose of approximately 5,045 tons of excavated soil in a consolidation area off-site at the nearby Permapost facility where soil would be contained under an engineered cap.
- Import and place clean fill material to return excavated areas to the existing grade.
- Amend soil exceeding remediation criteria in other portions of the Terrace with activated carbon (approximately 113 tons of carbon amendment over 15,006 square yards) and conduct effectiveness monitoring.
- Replant and reseed over 3 acres of area to restore habitat conditions.

This cleanup plan provides a protective, long-term solution that will effectively remediate soil conditions and improve habitat, as further described in the ABCA.

Description of Task, Activities, and Outputs

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

Table 5. Tasks and Activities

Task 1 – Project Management

- b. Implementation:** The City Project Manager (PM) and the qualified environmental professional (QEP) will be responsible for overall project management and execution, with oversight and input from EPA and DEQ. The City PM will manage project tasks, monitor schedule and budget, report on project activities to stakeholders, and procure and oversee the QEP pursuant to 2 CFR 200. The QEP will support reporting and developing a final closeout report documenting all project activities under DEQ oversight such as the Voluntary Cleanup Program. Two City staff will attend two regional brownfield conferences.
- c. Anticipated Project Schedule:** QEP procurement will be compliant with 2 CFR 200 and take place after the notice of grant award; grant funding is expected to become available by 2026. Procurement of the QEP is expected between July–December 2026; additional project management work will take place July 1, 2026–September 30, 2030.
- d. Task/Activity Lead:** City PM and QEP project managers.
- e. Outputs:** 15 quarterly reports, 4 federal financial reports (FFRs), 1 final summary report.

Task 2 – Community Engagement and Outreach

- b. Implementation:** The City will collaborate closely with area residents, project partners, and other stakeholders throughout the cleanup planning and remedial action; develop a public involvement plan and conduct four community outreach meetings at key project milestones; maintain and update the project websites and online information repository; and communicate project information through newspaper, newsletter, social media, email, and/or website notifications. The QEP will support the City with facilitating community meetings, drafting articles and press releases, and assisting with outreach to neighbors in the community, including finding interpretation and translation for meetings and administering stipends through partnership with the community based organizations.
- c. Anticipated Project Schedule:** July 1, 2026 to September 30, 2029 with key public meetings in 2026/7 (during cleanup), July 2029 (post cleanup), and other milestone meetings. Meeting frequency will be identified in a public involvement plan.
- d. Task/Activity Lead:** City PM and QEP project managers; assist: project partners.
- e. Outputs:** 1 public involvement plan (PIP), four community meetings and notes/attendance/recordings, website and online information archive, 6 press releases or newspaper/web articles. Other outreach as needed.

Task 3 – Remedial Design and Cleanup Planning

- b. Implementation:** Activities will include preparing a work plan for additional sampling to address data gaps for remedial design; performing a cultural resources review and assessment for the project area; preparing a wetlands delineation, obtaining permits, and undergoing wetlands compensatory mitigation (if present); negotiating and receiving regulatory approvals; completing 50%, 90%, and 100% design documents; preparing bid documents for cleanup contractors; and bidding process support, including contractor selection.
- c. Anticipated Project Schedule:** July 1, 2027–July 1, 2028.
- d. Task/Activity Lead:** City; assist: QEP, EPA, and DEQ project managers.

Table 5. Tasks and Activities

e. **Outputs:** 1 ABCA; 1 data gaps investigation work plan; 1 health and safety plan, 1 quality assurance project plan; 50%, 90%, and 100% design documents; 1 set bid documents.

Task 4 – Remedial Action Implementation

b. **Implementation:** The Applicant will use the majority of the grant funding for site cleanup implementation. With support from the QEP, the City will procure a remediation contractor in compliance with state regulations and 2 Code of Federal Regulations 200.317.326, which the Applicant project manager will oversee with QEP assistance. Contractor cleanup activities are estimated to include excavation and off-site disposal of approximately 5,045 tons of contaminated soil; with backfilling, grass seeding, and vegetation planting to restore park conditions as application of 113 tons of carbon amendment over 15,006 square yards. The Applicant will work with DEQ to ensure the cleanup meets state regulations.

c. **Anticipated Project Schedule:** July 1, 2028—September 1, 2029.

d. **Task/Activity Lead:** City PM; assist: construction contractor, QEP, and DEQ and EPA project managers.

e. **Outputs:** 1 final cleanup summary report.

Task 5 – Monitoring and Improvements

b. **Implementation:** The City PM will perform yearly carbon amendment and habitat conditions monitoring post completion to ensure park restoration is achieved for future intended use.

c. **Anticipated Project Schedule:** September 1, 2029—September 30, 2030.

d. **Task/Activity Lead:** City PM; assist: QEP.

e. **Outputs:** Yearly monitoring report.

f. Cost Estimates

The City will lead Tasks 1 and 2, with consultant support as needed. The QEP will lead Tasks 3 through 5, with assistance from the City when required. Personnel costs are based on City staff rates of \$155 per hour. No subawards or participant support costs are anticipated. All cost estimates in Tables 6 and 7 were developed by professional engineering consultants (Maul Foster & Alongi, Inc.) in coordination with the City.

| Table 6. Project Budget | Project Tasks | | | | | |
|-----------------------------|-----------------------|--------------------------------------|---|-----------------------------------|--------------------------------|--------------------|
| | 1. Project Management | 2. Community Engagement and Outreach | 3. Remedial Design and Cleanup Planning | 4. Remedial Action Implementation | 5. Monitoring and Improvements | Total |
| Direct Costs | | | | | | |
| Personnel | \$30,535 | \$15,500 | \$9,920 | \$0 | \$0 | \$55,955 |
| Travel | \$1,860 | \$0 | \$0 | \$0 | \$0 | \$1,860 |
| Contractual | \$38,745 | \$29,520 | \$218,300 | \$0 | \$44,200 | \$330,765 |
| Construction | \$0 | \$0 | \$0 | \$2,108,700 | \$0 | \$2,108,700 |
| Total Direct Costs | \$71,140 | \$45,020 | \$228,220 | \$2,108,700 | \$44,200 | \$2,497,280 |
| Total Indirect Costs | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 |
| Total Budget | \$71,140 | \$45,020 | \$228,220 | \$2,108,700 | \$44,200 | \$2,497,280 |

Table 7. Development of Cost Estimates

| Task | Cost Basis and Assumptions |
|--------------------------------------|--|
| 1. Project Management | <p>Personnel: \$30,535</p> <ul style="list-style-type: none"> 24 project team meetings (6 meetings/year) (24 x \$155/hour [hr]) x 2 City personnel) = \$7,440 15 Quarterly Reports (15 reports x \$155/hr x 1 hrs/report = \$2,325) 4 FFR reports (4 reports x \$155/hr x 1 hr/report = \$620) 1 Final Summary Report (1 report x \$155/hr x 2 hours = \$310) 2 Regional Brownfield Conferences (32 hours x \$155/hr[staff 1]) + (32 hours x \$155/hr[staff 2]) = \$19,840 <p>Contractual Costs: \$38,745</p> <ul style="list-style-type: none"> 24 project team meetings (6 meetings/year) (24 x \$205/hr x 2 QEP personnel = \$9,840) 15 quarterly reports (15 reports x \$205/hr x 7 hrs = \$21,525) 4 FFR reports (4 reports x \$205/hr x 4 hrs = \$3,280) 1 final summary report (1 report x \$205/hr x 20 hrs = \$4,100) <p>Travel Costs: \$1,860</p> <ul style="list-style-type: none"> Two staff to attend two regional brownfield conferences (\$465/person x 2 staff x 2 conferences = \$1,860; includes hotel, meals, rental car/mileage and incidental costs) |
| 2. Community Engagement and Outreach | <p>Personnel: \$15,500</p> <ul style="list-style-type: none"> Community outreach meetings (4 meetings x 8 hrs x \$155/hr= \$4,960) Public involvement plan (8 hrs x \$155/hr = \$1,240) Preparation of press releases or newspaper/web articles (40 hrs x \$155/hr = \$6,200) |

| Table 7. Development of Cost Estimates | |
|---|--|
| Task | Cost Basis and Assumptions |
| | <ul style="list-style-type: none"> Direct outreach and engagement with impacted, underserved communities (20 hrs x \$155/hr = \$3,100) <p>Contractual Costs: \$29,520</p> <ul style="list-style-type: none"> Public involvement plan (20 hrs x \$205/hr = \$4,100) Community outreach meetings (4 x 10 hrs x \$205/hr = \$8,200) Articles/media updates (6 articles x 4 hrs x \$205/hr = \$4,920) Direct outreach and engagement with impacted, underserved communities (40 hrs x \$205/hr = \$8,200) Interpretation and translation (20 hrs x \$205/hr = \$4,100) |
| 3. Remedial Design and Cleanup Planning | <p>Personnel: \$9,920</p> <ul style="list-style-type: none"> Support development of Bid Documents (RFP) for cleanup activities, evaluation of bids, calling references, coordination of pre-bid onsite meeting and selection of contractors (40 hours at \$155/hr = \$6,200) ABCA and engineering design work plan review (24 hrs x \$155/hr = \$3,720) <p>Contractual Costs: \$218,300</p> <ul style="list-style-type: none"> Finalize ABCA, including incorporating comments from public notice, further sampling and regulatory review Quality Assurance Project Plan (QAPP) Health & Safety Plan (HASP) Cultural resources review and assessment Engineering Design Documents Permitting Bid Document preparation <p>See attached ABCA for remedial design and permitting costs</p> |
| 4. Remedial Action Implementation | <p>Contractual Costs: \$2,108,700</p> <p>Contractor cleanup activities are estimated to include:</p> <ul style="list-style-type: none"> Mobilization and site preparation: \$182,220 Excavation and consolidation of approximately 5,045 tons of dioxin/furan and metal-impacted soil; with backfilling, grass seeding, and vegetation planting to restore park conditions as application of 113 tons of carbon amendment over 15,000 square yards and over 3 acres of replanting to restore habitat conditions: \$1,287,780 Project management, construction management, environmental covenant and site management plan preparation: \$243,700 Contingency: \$395,300 <p>See attached ABCA for cleanup cost estimates (1 cleanup x \$2,108,700)¹⁹</p> |
| 5. Monitoring / Improvements | <p>Contractual Costs: \$44,200</p> <ul style="list-style-type: none"> Yearly carbon amendment/habitat monitoring and reports |

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

g. Plan to Measure and Evaluate Environmental Progress and Results

The City and QEP will develop a project work plan that includes a milestone schedule and specifies the project management software for tracking progress. Key milestones will include completion of the sampling and analysis plan, quality assurance project plan, public meetings, and remedial action implementation. The City will evaluate monthly progress in coordination with the QEP and construction contractor and publish results in quarterly progress reports, which the City will review and make publicly available on the project website. Measurement will compare output and outcome goals to quarterly achievements so that deviations can be identified and corrected in a timely manner. Measurable cleanup results that the City and QEP will record include reduction of contaminant concentrations below risk-based thresholds for human and ecological health through performance and confirmation sampling during remedy construction. Oregon DEQ will provide regulatory oversight and review all reports. Upon successful completion of cleanup, additional investments that have been allocated to promote public access can be advanced. While these investments are outside of this grant request, these improvements cannot take place until cleanup occurs. The project work plan will identify methods to track post-cleanup improvement that can be tied to EPA cleanup grant outcomes.

¹⁹ MFA. 2025. *Analysis of Brownfield Cleanup Alternatives, Rock Creek Terrace, 3080 SE River Road, Hillsboro, Oregon*. Prepared for City of Hillsboro, Oregon. Maul Foster & Alongi, Inc. December 17.

4. Programmatic Capability and Past Performance

Programmatic Capability, a.-b. Organizational Structure and Description of Key Staff

The Cleanup Grant primary point of contact will be Ken Christian, Project Manager within the Economic and Community Development Department. Ken brings over 20 years of experience with the City of Hillsboro, having served across four different departments during his tenure. He will be supported by Jeroen Kok, Parks and Recreation Department Manager, who has demonstrated strong leadership in overseeing environmental and community-focused projects, making him well-suited to manage these efforts. His background in strategic planning and project oversight provides the expertise needed to achieve project milestones effectively.

Key staff also include Beatriz Medel from the City's Communications Department, who will lead outreach efforts. The City has a dedicated Grants Manager, Arlie Bonto-Kim in the Finance Department, who will offer expertise in managing the grant, including navigating federal requirements and general compliance. The City's prior success implementing an EPA Brownfield grant, knowledge of the EPA grant process, and a history of meeting compliance and reporting standards, gives the project a strong foundation for success.

c. Acquiring Additional Resources

The City has a well-established procurement process for securing qualified contractors to support brownfield projects. During a previous grant award, the City issued a Request for Qualifications (RFQ) to solicit qualifications from local QEPs during the Summer of 2021 to support the EPA Brownfield Assessment grant. The RFQ process was completed in accordance with 2 CFR Part 200 Uniform Administrative Requirements for Grants and Cooperative Agreements for Federal Awards and EPA specific Regulations for Grants and Agreements at 2 CFR Part 1500. The City then entered into a professional service agreement with the respondent determined most qualified to serve as QEP for the project. As part of the project implementation, the City retained documentation of the procurement process. City personnel provided the in-kind labor resources and supplies to accomplish this task prior to execution of the contract agreement.

Past Performance and Accomplishments

d. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments,

The City received an EPA Brownfield Assessment (BF-02J18501) grant in 2022 for \$500,000. This grant funded eight brownfield environmental site assessments (Phase 1 or 2 ESA) within the City's Downtown Urban Renewal Area, which includes the southwest industrial area, the City's traditional Main Street, light rail corridors, and historic residential neighborhoods. Accomplishments are summarized below:

| | |
|---------------------------------|---|
| 235 SE Edgeway Drive | Ph1 and Ph2 ESA completed. No environmental concerns. The City is evaluating purchase of property to use a portion for multifamily housing. |
| 247 SE Washington Street | City has completed Ph1 ESA and has demolished on-site building to allow better access. ACM survey was completed prior to demo. Building and tank removal were leveraged with funding outside the EPA grant. Ph2 ESA was completed and confirmed presence of petroleum and chlorinated solvents. |
| 874 SW Baseline Street | Ph2 ESA and UST removal completed. Private funds were used to demolish above-grade structures and complete an ACM survey. Determined VI mitigation should be included in future redevelopment. |
| 897 SW Oak Street | Ph1 ESA completed. RECs identified. Purchaser has closed on property. Plan is to merge with adjoining 874 SW Baseline parcels to create larger area for development. |
| Van Rose Farm | Ph1 ESA started but project stalled and may occur at a later date. |
| 255 SE 6th Avenue | Ph1 ESA completed and identified REC associated with adjacent heating oil USTs. Ph2 ESA completed and no contamination was identified. |
| 339 NE Lincoln | Ph1 ESA completed. Site purchased by an entity looking to redevelop the Property into an urban winery. |
| 175 SE Baseline Street | Ph1 ESA completed by potential purchaser and identified adjoining site RECs. The Property transaction did not occur. |

(2) Compliance with Grant Requirements As of the latest quarterly report issued to EPA on January 15, 2026 for reporting periods 10/01/2022 through 12/31/2025, \$406,686 has been spent with \$93,314 remaining (>80 percent spent). Additional tasks anticipated under the grant include development of an expanded site inventory, ongoing discussions with citizens interested in or actively pursuing properties using grant funds, and additional Phase 1 and 2 ESAs. All reporting requirements are up to date and routinely completed by the City's consultant (Pioneer Technologies Corporation) retained by the City. This grant was audited in 2023 by EPA and was found to have satisfied all agreements and reporting requirements to date.

ATTACHMENT 1

THRESHOLD CRITERIA

City of Hillsboro Rock Creek Terrace Restoration-EPA Brownfields Cleanup Grant

III.B. Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

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

The Applicant as a City (Oregon Municipal Corporation) is eligible to apply for a cleanup grant.

2. Previously Awarded Cleanup Grants

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

3. Expenditure of Existing Multipurpose Grant Funds

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

4. Site Ownership

The Applicant affirms that it owns Tax Lot Number:1S209BC01100 (3080 SE RIVER RD, HILLSBORO, OR), the Site of the proposed cleanup project, and has owned the Site since at least 2010. City Parks and Recreation manages the land. The City also affirms that, if awarded Brownfields Cleanup grant funds, it will retain ownership of the Site for the duration during which time the Brownfields Cleanup grant funds will be disbursed for the cleanup of the Site.

5. Basic Site Information

a) Site Name: Rock Creek Terrace

b) Site Address: 3080 SE RIVER RD, HILLSBORO, OR, 97213; Tax Lots: 1S209BC01100.

A site map showing both the Rock Creek Terrace property and the nearby Permapost site under RCRA correction action is provided as Attachment 2.

6. Status and History of Contamination at the Site

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

The Rock Creek Terrace (Terrace) is contaminated by hazardous substances. Soil conditions in the Terrace are summarized in the Permapost Resource Conservation and Recovery Act Permit Focused Remedial Investigation Report. In summary, dioxin toxicity equivalent (TEQ) and metals show elevated concentrations in Terrace soil samples (up to 6,740 ng/kg dioxin TEQ). The Permapost facility is located approximately 800 feet to the east. Permapost is subject to a RCRA Permit (Permapost Products Hazardous Waste Post-Closure Permit ORD 009 041 187, effective September 17, 2008 until September 17, 2018; application for renewal is on hold until a Record of Decision is issued by Oregon DEQ and Permapost is therefore currently under interim status (RCRA part 265 as opposed to 264). Feasibility analysis for cleanup is currently being conducted under DEQ oversight by Permapost.

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

The Terrace is riparian habitat that is severely overgrown with invasives and is currently not actively used. As noted above, a drainage ditch historically conveyed impacted stormwater to the area.

c) Environmental concerns, if known, at the site

Environmental concerns include shallow soil contamination (primarily dioxins/furans) and invasives that dominate the area (Himalayan blackberry). Rock Creek is adjacent to the Terrace and is home to a variety of fish species, including threatened and endangered species Coho salmon, Cutthroat trout, and Steelhead trout.

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

Historical sources of contamination to the City-owned Terrace include treated wooden railroad ties from the adjacent railroad, surface impoundment overflows from the Permapost facility (located approximately 800 feet to the east) that occurred between 1965 and 1975, and untreated stormwater from Permapost that discharged to the railroad ditch and nearby drainage cut on the Terrace until 2003, when a stormwater treatment system was installed by Permapost. Soil conditions in the Terrace are summarized in the Permapost 2019 Resource Conservation and Recovery Act Permit Focused Remedial Investigation Report. In summary, dioxin TEQ and metals (arsenic, chromium, and copper) show elevated concentrations in Terrace soil samples (up to 6,740 ng/kg dioxin TEQ). The area of contamination spans approximately 3.5 acres of the approximately 15 acre Terrace lot. Sources are controlled and recontamination is not expected following remediation.

7. Brownfield Site Definition

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

8. Environmental Assessment Required for Cleanup Grant Applications

A DEQ-approved 2019 Resource Conservation and Recovery Act Permit Focused Remedial Investigation Report has been completed which includes assessment of the Terrace.

9. Site Characterization

A current letter from the appropriate State Authority (Oregon DEQ) is attached stating the Terrace has been characterized by Permapost; that the Terrace is not subject to RCRA corrective action; and that there is sufficient characterization for remediation work to begin.

10. Enforcement or Other Actions

The Applicant affirms there are no known ongoing or anticipated enforcement actions related to this Site.

11. Sites Requiring a Property-Specific Determination

As determined in coordination between EPA and DEQ, a property-specific determination is not required. As stated in an email dated November 7, 2024 from EPA (Terri Griffith), it appears that the City of Hillsboro qualifies as a Bona Fide Prospective Purchaser (BFPP) for the Rock Creek Terrace property (3080 SE RIVER RD, HILLSBORO, OR, 97213; Tax Lot: 1S209BC01100.

Key factors supporting this determination are:

- The City of Hillsboro, property owner, has not been issued a RCRA permit for the Terrace property.
- The Permapost RCRA permit is issued to Permapost for the Permapost facility's property and requires investigation under Cleanup Program which includes on and off-site efforts (i.e. Terrace Property). This is the only aspect of the Permapost RCRA permit that intersects with the Terrace property, a requirement for Permapost to investigate contamination from its facility.
- The City owned Terrace property is not subject to a RCRA corrective action.
- The Permapost property is subject to a RCRA corrective action for groundwater. The Terrace property does not fall into the footprint of properties impacted by the groundwater contamination from Permapost so the corrective action for groundwater does not include the Terrace property.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a) Property Ownership Eligibility – Hazardous Substance Sites

For sites contaminated by hazardous substances, persons, including government entities, who may be found liable for the contamination under CERCLA § 107 are not eligible for grants. To be eligible for a Brownfields Grant to address hazardous substances at a brownfield property, the Applicant will demonstrate that they meet the requirements for asserting an affirmative defense to CERCLA liability through one of the landowner liability protections (e.g., the bona fide prospective purchaser liability protection per CERCLA § 101(40)).

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

The City acquired the property after January 11, 2002, and are asserting the BFPP liability protection (the most common liability protection) and demonstrates that they complied or are complying with all of the requirements listed below:

- The owner acquired title to a property after January 11, 2002.
- The owner conducted all appropriate inquiries (AAI) prior to acquiring the property. AAI, is met by having conducted a Phase I Environmental Site Assessment using the ASTM E1527-21 (or ASTM E2247-16) standard practice (May 28, 2010) as well as a

Phase II ESA (June 7, 2010), within one year prior to the date the property was acquired (July 7, 2010).

- 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 (latest 2003) the City acquired 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 and will comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls associated with response actions at the Site.
- The owner has and will provide full cooperation, assistance, and access to authorized persons.
- The owner must 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 will not impede performance of a response action or natural resource restoration.

13. Cleanup Authority and Oversight Structure

a) Describe how you will ensure adequate oversight of the cleanup at the Site(s). Indicate whether you plan to enroll in a state or Tribal response program.

The Terrace will be cleaned up under Oregon DEQ oversight.

b) Cleanup response activities often impact adjacent or neighboring properties. For example, access to neighboring properties may be necessary to conduct the cleanup, perform confirmation sampling, or monitor offsite migration of contamination. If this type of access is needed, provide your plan to acquire access to the relevant property(ies).

Access may require notification and coordination with industrial tenants in the D&G Industrial Park and the Portland & Western Railroad.

14. Community Notification

The City has provided the community an opportunity to comment on the proposed grant application and draft ABCA at a public meeting held and lead by the City (Ken Christian) on January 13, 2026. The meeting notice was published on January 9, 2026, through a Community Notification ad posted on the City website ([Brownfields Clean Up Grant for Fiscal Year 2026 | News & Announcements | City of Hillsboro, OR](#)). The notice stated the date, time, and place of the public meeting and indicated a draft of the application and ABCA is available for comment (see Attachment 5). No comments or questions were received. The following documents are included in this application package as Attachment 4 and 5:

- A copy of the ABCA (Attachment 4)

- A copy of the public meeting notice on the City of Hillsboro's website (Attachment 5)
- Public meeting screen shot/participant list (Attachment 5)

15. Named Contractors and Named Subrecipients

N/A



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 20, 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 Hillsboro
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 Hillsboro for approximately 3.5 acres of the Rock Creek Terrace site. The site is eligible and intends to enroll in the state voluntary response program. The property has been assessed by Permapost Products Co. (see ECSI ID 0148) under DEQ Cleanup Program oversight. Soil conditions in the Terrace are summarized in the 2019 Permapost Resource Conservation and Recovery Act (RCRA) Permit Focused Remedial Investigation Report and the 2022 Supplemental Investigation Report. Note that the City of Hillsboro Rock Creek Terrace site is not subject to the RCRA corrective action but has been impacted from contaminant trespass (see below).

Untreated stormwater from the Permapost facility (located approximately 800 feet east of the site) discharged to a railroad ditch and drained to the Terrace until 2003 when a stormwater treatment system was installed by Permapost. Shallow soil contaminated with heavy metals and dioxins remains onsite that poses a risk to a variety of sensitive fish species in the nearby Rock Creek. DEQ affirms that sufficient site characterization has been performed for remedial work to begin.

The City of Hillsboro has owned the property since at least 2010, and City Parks and Recreation manages the land. The Terrace is riparian habitat that is not actively used. After the site is remediated, the Terrace will be incorporated into the Crescent Park Greenway trail which will connect green spaces within the larger community, provide recreational amenities, and restore and preserve natural areas and stream corridors.

The EPA Brownfield Cleanup Grant will support the cleanup of hazardous substances that pose a risk to the environment and impede site reuse. DEQ encourages EPA to fund the \$2.67 million Cleanup Grant Application from the City of Hillsboro. 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
Katie Daugherty, DEQ NWR Cleanup Project Manager
Ken Christian, City of Hillsboro