

APPLICATION INFORMATION SHEET

1. Applicant Identification

Port of Columbia County (Port)
100 E Street
Columbia City, Oregon 97018

R10-26-C-006

2. Website URL

<https://www.portofcolumbiacounty.org/>

3. Funding Requested

- a. Cleanup Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$4,000,000

4. Location

- a) St. Helens
- b) Columbia County
- c) Oregon

5. Property Information

Former Pope & Talbot Wood Treating Site
1550 Railroad Avenue
St. Helens, Oregon 97051
See attached map.

6. Contacts

A. PROJECT DIRECTOR

Elliot Levin
North County Operations & Terminal Manager
503-369-9414
levin@portofcolumbiacounty.org

B. CHIEF EXECUTIVE/HIGHEST RANKING ELECTED OFFICIAL

Sean Clark
Executive Director
503-397-2888
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7. Population

St. Helens: 14,152

8. Other Factors

Information on the Other Factors	Page #
Community population is 15,000 or less.	1
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.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The proposed site(s) is in a federally designated flood plain.	1
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2-3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	2-3
The proposed project will improve local climate resilience to the impacts of extreme weather events and natural disasters.	2-3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	N/A

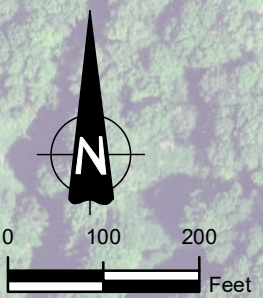
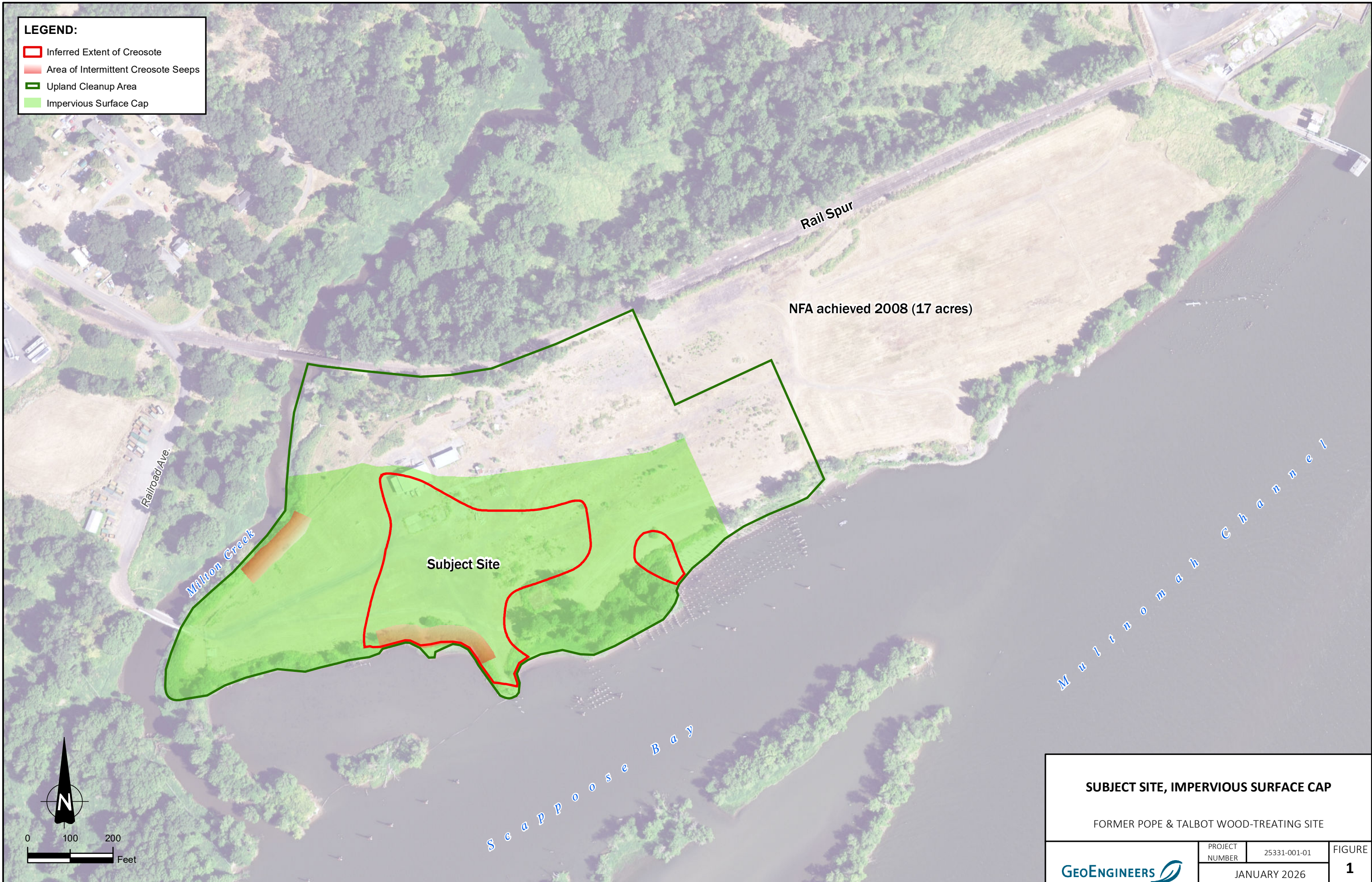
9. Releasing Copies of Applications

Not applicable.

Attachment: Site Map

LEGEND:

- Inferred Extent of Creosote
- Area of Intermittent Creosote Seeps
- Upland Cleanup Area
- Impervious Surface Cap



SUBJECT SITE, IMPERVIOUS SURFACE CAP

FORMER POPE & TALBOT WOOD-TREATING SITE

	PROJECT NUMBER	25331-001-01	FIGURE
	JANUARY 2026		1

NARRATIVE

1. Project Area Description and Plans for Revitalization

TARGET AREA AND BROWNFIELDS.

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

The Port of Columbia County (the Port) requests a \$4,000,000 U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Grant to remediate a contaminated site in the City of St. Helens, Oregon. The Port is a special district serving the entirety of Columbia County, Oregon (the County, pop. 53,178, approx. 25 miles north of Portland). The County encompasses 51 miles along the Columbia River (River), which is the boundary between Oregon and Washington. The County includes seven cities with populations ranging from 59 to 14,152, of which St. Helens (the City; 5.3 square miles) is the largest and the County seat.¹ The Target Area (TA) is Census Tract 9707, which forms the southernmost part of the City. The TA is bounded by Scappoose Bay to the south and east, Old Portland Road and Milton Creek to the west, and undeveloped land to the north. The TA is adjacent to the confluence of Scappoose Bay and the Multnomah Channel of the Willamette River, which joins the Columbia River 1.3 miles northeast of the TA.

Beginning in 1850, the City's waterfront powered its growth as a center for lumber and paper mills that treated wood using hazardous substances including creosote, a compound that is acutely toxic to aquatic life and a risk factor for respiratory irritation and cancer in humans. By the 1990s, the County's relatively small mills could not compete due to timber industry consolidation. They closed, leaving behind brownfields concentrated in the TA, high unemployment, and economic hardship. The County's timber-related workforce dropped from 14% in 2001 to 6% by 2023.²

Brownfields have impacted the TA more than any other area of the County because TA residents depended on jobs located at these sites and they live closer to them than other City residents. This increases TA residents' vulnerability to environmental impacts and compounds economic vulnerability due to job losses. Large, hazardous, waterfront brownfields cover 324 acres along the TA's eastern boundary with Scappoose Bay and the Multnomah Channel, stretching along 2.5 miles of waterfront. Assessments show these sites are contaminated with creosote, carcinogenic polycyclic aromatic hydrocarbons (PAHs, contained in creosote),³ heavy metals, dioxins, and other hazardous substances, all of which are linked to human and ecological health risks. These brownfields cut off almost all waterfront access in the TA. They also threaten human health, contaminate water and aquatic life, and pollute air. They constrain land availability for economic development because they occupy the County's best industrial land and leave it idle, which reduces tax revenue and stymies job creation. Of 33 available industrial sites County-wide, only 7 are shovel-ready within 6 months.⁴ Today, due to lack of local jobs, 73% of employed City residents commute outside the City for work, and over 41% work outside the County.⁵ Because commuters buy groceries and gas elsewhere, small local businesses lose revenue and local tax receipts decline, which further limits resources for site reuse and economic recovery. Oregon land use laws compound these impacts because they require cities to develop only within urban growth boundaries, which can only be expanded with considerable time and expense. Brownfield redevelopment is therefore the City's, County's, and Port's only option to generate the land necessary for economic recovery, but due to lack of local resources, cleanup will not happen without this grant.

Cleanup funding will make land available to facilitate development of a new industrial or power generation facility. This will create jobs and expand the local economy while also safety expanding waterfront access and local trail networks, a top community priority (1.c). Because creosote profoundly impacts soil microbial communities and limits the soil's ability to support plant life, cleanup will support habitat protection and biodiversity (see 1.d). Despite the presence of contamination, these sites are still home to rare plant and animal communities. Expanding public access to this area with appropriate trails, interpretive signage, and infrastructure will help correct a profound lack of safe waterfront access while also supporting local economic development through tourism.

¹ U.S. Census Bureau. 2022 American Community Survey 5-Year Estimates (2018-2022)

² Headwaters Economics. 2023. Economic Profile System – Columbia County, OR Profile of Timber and Wood Products

³ PAHs are formed by burning organic material and are therefore linked to combustion activity.

⁴ Port of Columbia County (2022). Columbia County Industrial Land Supply.

⁵ U.S. Census Bureau. 2023 American Community Survey 5-Year estimates (2018-2022)

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

The target site (the Site, 1550 Railroad Avenue), is an 8.9-acre (387,350 square foot) upland portion of the 42-acre former Pope & Talbot (P&T) property, a wood-treating plant that operated from 1912 to 1960. P&T declared bankruptcy in 2008. The Site is bordered by a rail spur and green space on the north, Milton Creek on the west, Scappoose Bay on the south, and on the east, a 17-acre portion of P&T for which the Oregon Department of Environmental Quality (DEQ) issued a Notice of No Further Action (NFA) in 2008 (see map). The Site is at Lat. 45.840750° N, Long. 122.811605° W, zoned industrial, and is within the 100- and 500-year floodplains. The Port purchased the Site in 1963, and it has been vacant since 1974 except for a single-story, 3,500-square-foot warehouse and covered parking structure leased to a septic company for vehicle storage. A city road through the north-adjacent brownfield site provides Site access. A 2020 Phase II Environmental Site Assessment (ESA) identified that creosote from P&T's past wood-treating activity contaminates Site soils and groundwater and seeps into multiple adjacent water bodies, including Scappoose Bay and Milton Creek. PAHs in creosote pollute air (see 2.b). The Port has selected the Site for remediation for multiple reasons. Its cleanup will address the remaining unremediated upland area of P&T and will substantially advance the P&T property toward regulatory closure. Site cleanup and reuse can immediately facilitate safe reuse to meet community demand for trails and waterfront recreation, and land for medium and longer-term economic development needs. Remediation will raise the Site's natural elevation out of the 100-year floodplain, which, in combination with the adjoining 17-acre area of P&T that received an NFA from DEQ in 2008, will generate 25.9 (8.9+17) contiguous acres above the floodplain to help address a County-wide shortage of viable industrial land.⁶ In addition, the Port has selected the Site for remediation because it poses serious health risks to people and the environment due to creosote, which is acutely toxic to aquatic life, and increases risk for respiratory irritation and various forms of cancer for people in the TA who ingest creosote by eating contaminated fish. Cleanup planning is also moving forward at the adjacent northern and southern brownfields sites, and this funding would ensure the Site's cleanup keeps pace with them.

REVITALIZATION OF THE TARGET AREA.

1.c. Reuse Strategy and Alignment with Revitalization Plans.

Immediate Site reuse strategies include recreational trails and a boat launch for waterfront access. Medium to longer-term strategies include industrial use or energy generation. All strategies reflect robust public comment collected from 2023 to 2025 at public meetings and via ongoing community feedback to local leaders. Informal feedback to local leaders indicates that residents across all income levels want improved park and river access via trails and boat launches, and that they value expanding existing regional trail networks to new parts of the City, including the TA. Waterfront access ranked among the top four most requested amenities in the City's 2014 Community Survey and ranked as the top priority in a 2011 County survey.

A boat launch would encourage local use and recreational tourism, a priority in Columbia Pacific Economic Development District's (ColPac's) Destination Development Plan, which calls for leveraging infrastructure and assets to support tourism development. Recreational tourism is also a priority in the 2022-2027 Comprehensive Economic Development Strategy (CEDS), which ColPac manages.

Recreational reuse aligns with City, Port, and County plans and is an appropriate use for land in a floodplain (1.b). The City's 2016 Waterfront Development Framework identifies trail development as a goal, and its 2015 Parks and Trails Master Plan identifies the Site as a priority location for trail expansion. It also identified a parks shortage: only 29% of City residents and 0% of TA residents live within a 10-minute walk of a park, and this grant would help address those gaps. The Port has partnered with Friends of Parks and Trails – Milton Creek Park (Friends) to support outreach in the TA (which lacks a neighborhood association) about cleanup and planning for future construction of a 2.6-mile loop trail around the Site. This trail will connect the TA with the local trail network and lead to McCormick Park (the City's largest public park and a regional tourist destination), and the City's riverwalk (2.e-f). Port staff have walked the Site with Friends' founders multiple times to map the future trail, and Friends' feedback has shaped cleanup plans and timelines. Friends has committed volunteer labor for trail development (Table 1 and attached documentation).

Industrial/power generation reuse also aligns with the regional 2022-2027 CEDS, which identifies power for well-supported business development as a priority. The City's 2023 Comprehensive Plan and the 2023 Columbia River

⁶ *Port of Columbia (2022). Columbia County Industrial Land Supply.*

People’s Utility District (CRPUD) Strategic Plan also identify energy generation as a critical need for economic development. This aligns with informal community feedback indicating that more local jobs are a priority (see 1.a). More jobs, however, require more energy: in 2024, the County lost access to two major manufacturing investments that would have totaled over \$1 billion and generated 1,250 jobs (1.d). Lack of adequate energy supplies was a primary reason. Remediation will raise the Site out of the 100-year floodplain (3.a) and make industrial reuse viable for multiple activities, which could include solar power, an appropriate use for a federally designated floodplain since equipment can be elevated. A proprietary analysis from 2024 indicated that the Site could generate 10 megawatts of solar power annually, sufficient to power several new, mid-sized manufacturing operations.

1.d. Outcomes and Benefits of Reuse Strategy.

Trail development can proceed immediately following cleanup with support from project partners like Friends (1.e-g). This will improve TA residents’ quality of life by reducing risk of exposure to contamination, opening green space and waterfront for safe recreational access, and supporting economic development through job creation and small business development linked to recreational tourism. Tourism is one of the top three export industries for rural Oregon Counties.⁷ The County’s top tourist attraction is the City’s marina, which is owned and operated by the Port. The marina, however, cannot accommodate deeper draft vessels, whereas a boat launch at the Site could, expanding access for local and tourist boats. Cleanup will also contribute to tourism by helping protect economically valuable sport fish; for instance, the legal-sized population of white sturgeon in the lower River, which use Milton Creek and Scappoose Bay to migrate to and from the River, diminished by 68% between 1995 and 2023. By reducing the release of contaminants into sediment, cleanup will mitigate threats to these vulnerable bottom feeders, promoting ecological health and bolstering the local economy via fishing tourism.

By reducing threats to regional biodiversity, cleanup will create new destinations for recreational tourism. Per local conservation experts, despite contamination, biodiversity on the TA’s brownfields is unmatched elsewhere in the County. Cleanup and trail development will improve habitat for threatened animal and plant species including salmon, Columbian white-tailed deer, northern spotted owl, bull trout, monarch butterfly and a rare species of sphagnum moss—an Ice Age relic found only in a single basalt-lined pool on the Site and known from only three places statewide due to habitat loss – which will be a further tourism draw. The proposed 2.6-mile trail includes an Americans with Disabilities Act-compliant section to support universal access and economic development plans.

Medium and longer-term industrial reuse directly addresses economic development constraints like lack of viable industrial land, tax revenue, and jobs by raising the cap above the 100-year floodplain (see 3.a). Because the cap will be designed to withstand potential flooding, this will improve local resilience by preventing predicted larger, more frequent future flood conditions from discharging contamination.⁸ If used to generate solar energy, industrial reuse can also address the lack of adequate power (see 1.a) and leverage ongoing electrical infrastructure investment (see 1.h) while potentially boosting energy resilience for local industry. Any buildings on Site will incorporate energy efficiency measures per Oregon’s Energy Efficiency Specialty Code, which exceeds the standards set by many states.

STRATEGY FOR LEVERAGING RESOURCES

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

Characterization of the Site and the larger 42-acre P&T property is complete and requires no additional funding, but Table 1 shows potential resources should additional investigation be needed and if cleanup/reuse costs increase. This grant is sufficient to complete cleanup. Total cleanup costs are \$5,247,072, or \$1,247,072 more than this grant will support. To complete Site cleanup, DEQ will leverage \$500,000 from its Industrial Orphan Site Account, and the Port will leverage the remaining \$747,072 from insurance funds paid to the Port by two P&T insurers (see Table 1). Via an Intergovernmental Agreement (IGA) with the Port, DEQ will leverage an additional \$2.5 million in Industrial Orphan Site Account funds to install a permeable reactive barrier (PRB) post-cleanup, completing upland cleanup at the P&T property and significantly advancing the Site toward closure (see 3.a).¹² Under this IGA, the Port will match DEQ’s funds with \$2,500,000 to support potential PRB installation, and will contribute an additional \$2,452,928 to support additional cleanup costs, which may include PRB installation, shoreline cleanup, or cleanup within the 6.6 in-water

⁷ Travel Oregon. (2024). “The Economic Impact of Travel in Oregon.”

⁸ US Sea Level Rise Technical Report. (2022). <https://earth.gov/sealevel/us/resources/2022-sea-level-rise-technical-report/>.

acres that remain for a later remedial phase (see 3.a). All Port funds are historical insurance funds. Total leverage by the Port and DEQ is \$8.7 million, a leverage rate of \$2.18 against EPA dollars. Leverage documentation is attached.

Table 1. Resources for Assessment, Remediation and Reuse

Name of Resource	1.e. Assess, 1.f Remed., or 1.g Reuse	Secured or Unsecured?	Additional Details or Information About the Resource
Historical Insurance Funding	1.f Remediation	Secured	\$5.7 million from responsible party's two insurance carriers. \$747,072 is for Site cleanup, \$4,952,928 leveraged for potential PRB installation.
DEQ Environmental Cleanup Industrial Orphan Site Account	1.f Remediation	Secured	\$3.0 million. \$500,000 is for Site cleanup, \$2.5 million leveraged for potential PRB installation.
In-kind labor to support trail construction and maintenance	1.g Reuse	Secured	Friends of Parks and Trails – Milton Creek Park will provide \$48,000 in in-kind labor
Business Oregon	1.e and f Assessment & Remediation	Not secured, eligible	Grants and loans available via two Brownfields Revolving Loan Funds
Col-Pac EPA Brownfield Revolving Loan Program	1.f Remediation	Not secured, eligible	Loans and grants to support cleanup or hazardous building materials assessment for structure on-site
Travel Oregon Competitive Grants	1.g Reuse	Not secured, eligible	Supports ADA-accessible tourism infrastructure, like trails and boat ramps
Business Oregon Water/Wastewater Financing Program	1.g. Reuse	Not secured, eligible	Loans and grants to support sewer system design and build, if needed, for industrial use

1.h. Use of Existing Infrastructure.

This grant will facilitate the reuse of existing road, water, and electrical infrastructure at the Site. At a cost of \$14.9 million, the City is upgrading an existing Portland General Electric substation on the north-adjacent property, which will accommodate any energy eventually produced on the Site. Investments to increase transmission line capacity are also underway by CRPUD, estimated at \$5.7 million. The Site has a septic system, and if sewer is required, the Port will access state funds (Table 1) to connect to sewer from neighboring parcels. The Port will leverage Friends' in-kind labor by funding a boat ramp post-cleanup, or it may apply for Travel Oregon grants to support this and trail signage.

2. Community Need and Community Engagement

COMMUNITY NEED

2.a. The Community's Need for Funding

The Port's resources are extremely limited by its earning capacity, the County's small size and tax base, maintenance obligations, and state-mandated seismic resilience requirements. Since 2022, the Port has operated at a loss and lacks sufficient funding to support cleanup, except for historical insurance funds (see 3.b). Due to its small population, loss of industrial tax base, and maintenance commitments for existing assets, the City and County lack the requisite funding for Site cleanup and reuse. For example, the City resorted to selling City-owned property and timber harvests to maintain service levels in the 2024-25 budget.

Per Table 2, the TA's median income is 14% below the County's, while unemployment in the TA (4.8%) exceeds County levels (4.4%) by 9%. More TA residents live in poverty compared to the County, and TA households receive 34% more food stamps/SNAP benefits (23.6%) compared to the County (15.6%) and state (15.4%). At the only school in the TA, 74.4% of students are eligible for free/reduced price lunch versus 49% statewide.⁹ Educational attainment is lower, with 26.8% of TA residents possessing less than a high school degree, more than double the U.S. rate (11.6%) and 52% higher than County levels (17.6%). Some of this disparity may be due to the TA's history of timber-focused employment, which often did not require a high school diploma and paid family wages until the 1980s.¹⁰ 17% of TA residents are also cost-burdened, spending over 45% of household income on housing and transportation combined.¹¹ Small population size and limited resources prevent the Port, City or broader community from independently funding brownfields cleanup.

⁹ Oregon Dept. of Education. (2024). *Free and Reduced Price Eligibility for Oregon Public Schools, 2024-2025*. <https://tinyurl.com/y6a7b6xv>

¹⁰ Beda, Steven. (2014). *"Landscape of Solidarity: Timber Workers and the Making of Place in the Pacific NW."* University of Washington.

¹¹ *The Housing + Transportation Affordability Index by the Center for Neighborhood Technology defines cost burden as spending more than 45% of household income on housing and transportation combined.*

Table 2. Economic and Population Data

Indicator	TA (CT 9707)	St. Helens	Columbia County	Oregon	United States
2013 Population	4,221	12,985	49,317	38,687,21	311,536,594
2023 Population	4,227	14,152	53,178	4,238,714	332,387,540
Percent Change in Population (2013 to 2023)	0.1%	9.0%	7.8%	9.6%	6.3%
Median Age	42.2	36.7	43.2	40.1	38.7
Median Household Income	\$74,107	\$82,123	\$86,359	\$80,426	\$78,538
Below Poverty Level	9.2%	8.8%	8.7%	11.9%	12.4%
% Households Receiving FS/SNAP	23.6%	23%	15.6%	15.4%	11.8%
Unemployment Rate	4.8%	4.5%	4.4%	5.4%	5.2%
% Less than HS Graduate	26.8%	18.4%	17.6%	12.4%	11.6%

Notes: Shading indicates disparities compared to the county, state, or the U.S. Data | Source: U.S. Census 2023 American Community survey 5-year estimates (2019-2023)

2.b. Health or Welfare of Sensitive Populations

Per Table 3, the TA is home to multiple sensitive populations, including 18% more people over 65 compared to the City, 81% more people over 65 living in poverty versus the County, and 14% more females ages 15-44 versus the County. Health and welfare issues among these groups include food insecurity and substantially lower educational levels (Table 2); increased prevalence of asthma and chronic conditions like chronic obstructive pulmonary disease (COPD), obesity, and mental health conditions like depression (Table 4); and lack of access to waterfront and green space for physical exercise and recreation. For example, TA residents live ~0.5 miles from the river, but because the Site and other brownfields block access (1.a), to access waterfront they must travel ~2 miles to the City’s marina. These factors may increase TA residents’ sensitivity to contamination on or released by the Site, which can aggravate chronic conditions if inhaled, drunk, or consumed in fish. For example, in 2022-2023, Oregon State University (OSU) conducted an air sampling study at the Site for carcinogenic PAHs,¹² which creosote contains. In late summer and fall when temperatures are higher, water levels are lower and uncontrolled creosote seeps from previous industrial operations are exposed to air at the riverbank, PAH compounds volatilize. The OSU study found that airborne PAHs were elevated at the Site relative to in the City, where automobiles and other fuel combustion sources concentrate. PAHs at the Site may irritate lungs, trigger asthma attacks and exacerbate COPD, and accumulate in fish and increase the risk of cancer in fish consumers. This grant will reduce the risk of contaminant exposure and associated health impacts by capping and containing creosote and PAHs and preventing their release into water, sediment, and air.

Table 3. Sensitive Populations in the TA

Indicator	CT 9707	St. Helens	Columbia County	Oregon	U.S.
Age Above 65	17.3%	14.7%	19.6%	18.6%	16.8%
Age Above 65 Below Poverty	12.7%	10.9%	7%	9.4%	10.4%
Age Under 18	18.6%	22.8%	20.5%	20.2%	22.2%
Age Under 18 Below Poverty	7%	8.2%	9.7%	13.3%	16.3%
Female Ages 15-44	40.5%	41.5%	35.5%	39.2%	38.9%
Persons with Disability	15%	19.7%	16.7%	15.1%	13.0%

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.

Despite a slightly more physically active population compared to the U.S. and County, Table 4 shows that the incidence of multiple chronic conditions and diseases in the TA exceeds national and County rates. These conditions may be aggravated by an increased risk of exposure to hazardous substances present at the Site: creosote exposure has been linked with cancer, and PAHs in creosote aggravate asthma.¹³ Site cleanup with a protective cap will help mitigate these issues by preventing contaminants that may contribute to poor health outcomes in the TA from entering air, water, or accumulating in fish, which will reduce risk of exposure for TA residents. Reuse for trails and a boat launch provides accessible outdoor space to further encourage physical activity, promoting cardiovascular health and potentially reducing psychological burdens from disease and depression.

¹² PAHs are formed by burning organic material and are therefore linked to combustion activity.

¹³ Agency for Toxic Substances and Disease Registry. (2021). "Toxic Substances Portal: Creosote."; Hara, A. and Nakamura, H. (2025). "Exposure to PAHs and Asthma/Cough Diseases."

Table 4. Heath Indicators for Target Area

Health Indicator	TA (CT 9707)	Columbia County	United States
Asthma in adults	12.6%	12.2%	9.8%
Cancer in adults (non-melanoma)	8.1%	9.8%	7.9%
Chronic Obstructive Pulmonary Disease (COPD) in adults	7.2%	7.9%	6.2%
Heart disease in adults	6.0%	7.2%	6.4%
Physical inactivity in adults	21.6%	24.5%	22.1%
Obesity in adults	33.7%	33.5%	32.8%
Depression in adults	28.4%	27.3%	20.2%

Notes: Shading indicates higher sensitive populations in the target area compared to U.S. All data from 2023 CDC PLACES

2.d. Economically Impoverished/Disproportionately Impacted Populations

Job losses and environmental impacts from mill closures have disproportionately impacted TA residents, who experience lower incomes and elevated unemployment compared to the City and County (see 2.a). Some TA residents subsistence fish out of economic necessity; however, in 2020, the Oregon Health Authority issued a still-active fish consumption advisory for Scappoose Bay due to contamination, including PAHs. Despite signage, fishing continues at or near the Site. Tainted fish disproportionately impacts the impoverished population of the TA, who cannot afford to stop fishing. Bioaccumulation of PAHs in humans via fish ingestion aggravates health disparities identified in sections 2.b-c, which are already more common in economically distressed groups like TA residents, resulting in compounding negative effects. Site cleanup and reuse will directly benefit impoverished TA residents by preventing entry of creosote into waterbodies, thus improving water quality in Milton Creek and Scappoose Bay. This will also reduce contamination that impacts fish, human consumers, distressed TA populations, and recreational boaters. Because brownfield cleanup will reduce the risk of exposure to PAHs and creosote via water and off-gassing from soil and riverbank seeps, it will make the Site safe to visit and occupy. This will provide TA residents with local, low-cost access to safe natural spaces that support outdoor recreation and also foster recreation-based economic development. A boat launch at the Site could generate jobs and new tourism-related economic activity by serving deeper draft vessels (1.c). Likewise, solar or industrial reuse can support economic development and provide job opportunities. Regardless of their source, jobs can mitigate economic distress by increasing incomes, which can foster economic mobility and improve welfare for TA residents.

COMMUNITY ENGAGEMENT

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

Although it is within City limits, the TA is effectively rural and lacks a neighborhood association. Friends and the Scappoose Bay Watershed Council organize community activities in the TA, and the Port will collaborate with both to lead outreach efforts to Site neighbors and meaningfully engaging TA residents. Table 5 identifies additional partners who will assist the Port in connecting directly with TA residents and the broader community.

Table 5. Selected Project Partners and Roles.

Organization Name/Mission	Point of Contact (name & email)	Specific involvement or assistance provided
Friends of Parks and Trails – Milton Creek Park. Mission: Organize volunteers to beautify Milton Crk Park starting 6/1/26.	Lucas Green, Chair [REDACTED]	Contribute labor to trail planning/dev't/ maintenance, act as local project champions, share project updates and support direct outreach to impacted communities.
Scappoose Bay Watershed Council. Mission: Support and promote a healthy watershed through community restoration projects.	Rachell Meyers, Director director@scappoosebay-wc.org ; (503) 298-6996	Share cleanup information, organize restoration events along Milton Creek/Scappoose Bay and conduct outreach to engage TA residents and schools.
Columbia Pacific Economic Development District (Col-Pac). Mission: Promote regional economic dev't/collaboration	Sarah Lu Heath, Exec. Director SarahLu@nworegon.org , 971-328-2877	Host community meetings, share website/social media cleanup updates. Provide cleanup funding via Brownfields RLF if needed.
City of St. Helens	John Walsh, City Administrator jwalsh@sthelensoregon.gov 503-366-8211	Host community meetings; share project updates via website, social media; support business recruitment for reuse, partner on proposed trail planning and development.
City of St. Helens Parks Commission Mission: Oversee park planning, develop	Scott Jacobson, Chair [REDACTED]	Has worked with Port to lay out a 2.6-mile loop. Will share cleanup information, host public meetings, assist

partnerships to support park planning and development		in trail development, educate community (esp. Site neighbors) about cleanup.
Lower Columbia Estuary Partnership (nonprofit). Mission: Restore and protect lower Columbia River Estuary	Elaine Placido, Exec. Director elplacido@estuarypartnership.org ; 503-226-1565	Provide input on cleanup and restoration opportunities, support community outreach for cleanup updates cleanup, trail/rec. reuse.
Columbia Health Coalition (nonprofit) Mission: Promote policy change for health lifestyles	Nicholas Clark, Wellness and Engagement Manager contact@columbia-health.org 800-244-4870	Share cleanup information and how it relates to community health/wellness, share project updates and support direct outreach to impacted communities
Clean Columbia County (nonprofit) Mission: Support citizen efforts to ensure clean, healthy communities	Brady Preheim, President brady@preheim.com 503-543-4884	Provide input on cleanup and reuse, share project updates and support outreach to/input from the community about cleanup/reuse
South County Collaboration (convenes municipal and county leaders from area surrounding the TA)	Gina Sisco, Administration and Communications Manager 503-397-1844	Share cleanup progress with South County stakeholders, support outreach to/input from South County stakeholders on cleanup/reuse
Oregon DEQ	Katie Daugherty, Proj. Mngr; Katie.Daugherty@deq.oregon.gov ; 503-860-3943	Provide regulatory oversight, funding via DEQ Industrial Orphan Site Account Fund, feedback and approval of cleanup plans

2.g. Incorporating Community Input.

Upon award, the Port will develop a Public Involvement Plan (PIP) outlining strategies to meaningfully engage various stakeholders throughout this grant; it will seek input on the PIP from partners in Table 5. The Port will update its Commission quarterly, and will share at least quarterly project updates via local public radio, its monthly column in a local newspaper, and updates on its website and social media. The Port will also share project updates with the partners in Table 5 for distribution to their networks, and will distribute printed materials at the City library, and community and senior centers to engage residents with limited internet access. The Port will hold four community open houses to provide updates at key project milestones, including project start, cleanup mobilization, cleanup, and post-cleanup. Meetings will include virtual and in-person options for maximum participation and recordings will be posted on the Port's YouTube channel. The Port will record all public comments, share them on its website as part of meeting summaries, and at subsequent public meetings, will share how feedback has been incorporated into the cleanup plan and/or explain why certain feedback was not or could not be included. With partner support, the Port will meet regularly with communities living closest to the Site to directly share information about cleanup progress. The Port 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 Port's project goals and required outputs.

3. Task Descriptions, Cost Estimates, and Measuring Progress

3.A. PROPOSED CLEANUP PLAN.

ABCA Alternative 2 is the preferred cleanup action. To isolate contamination, Alternative 2 proposes construction of a low-permeability water and vapor cap with 2 feet of clean soil fill below it across the entire 8.9-acre Site. The cap will raise the Site above the 100-year floodplain, and the latest sea level rise projections will be used to establish final cap grade. Construction of multiple large bioswales on Site, outside areas of contamination, will manage stormwater runoff and provide soil for cap construction using characterized, clean Site soil. Because soil is coming from on-Site, no additional permitting is required. Alternative 2 uses institutional controls to restrict certain land and water uses and requires development and implementation of a contaminated media management plan, and implementation of contingency measures based on groundwater and riverbank monitoring. With leveraged DEQ and insurance funds, or ColPac resources in Table 1, the Port will abate any hazardous building materials and demolish the existing structure. Given available funding constraints, DEQ plans to monitor reduction of creosote discharge following cap placement before designing and installing a 750-foot PRB adjacent to the Site. If needed, the PRB will treat contaminated groundwater beneath the cap before it discharges into Scappoose Bay. If not needed, DEQ and the Port will use leveraged funds to conduct in-water cleanup on the P&T property's 6.6 in-water acres.

DESCRIPTION OF TASKS/ACTIVITIES AND OUTPUTS

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

Table 6. Tasks and Activities

Task 1 – Project Management	
b. Project Implementation, EPA-funded tasks: Port 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. Port will oversee QEP and review documentation/reporting. Port and QEP will meet monthly. Three Port staff will attend one National Brownfields Training Conference and 3 state/regional conferences.	
c. Anticipated Project Schedule: Ongoing throughout grant period. Work will begin upon completion of EPA-approved workplan, with grant period assumed Oct. 1, 2026 to Sept. 30, 2030.	
d. Task/Activity Lead: Port; Assist: QEP	
e. Outputs: Up to 48 project team meetings, 15 qtlly reports, 4 Federal Financial Reports, attend 1 Nat’l Brownfields Conf. and 3 state/regional confs., up to 16 qtlly ACRES updates, and 1 grant close-out report detailing cleanup progress and remaining needs.	
Task 2 – Community Engagement	
b. Project Implementation, EPA-funded tasks: Develop PIP and conduct four community meetings at key milestones (upon award, pre-, during and post-cleanup). Work closely with project partners (Table 5) and QEP to conduct direct outreach to impacted stakeholders.	
c. Schedule: Oct. 1, 2026 to Sept. 30, 2030. PIP by Oct. 31, 2026. Community meetings anticipated in Jan. 2026 (pre-construction, cleanup planning), May & Dec. 2026 (mobilization/cleanup), May 2028 (post-cleanup). Others as needed.	
d. Task/Activity Lead: Port, Assist: QEP	
e. Outputs: One PIP, 16 Port Commission updates, four 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	
b. Project Implementation, EPA-funded tasks: Hold 30-day public review and comment period of 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.	
c. Anticipated Project Schedule: ABCA finalized by Dec. 31, 2026. All permits/approvals, QAPP, HASP and SAP complete/approved by April 2027. Bid documents complete by May 2027. Contractor selected by July 2027.	
d. Task/Activity Lead: QEP, Assist: Port	
e. Outputs: 1 final ABCA; 1 HASP, QAPP, SAP; 100% remedial design documents; 1 set of bid documents; 1 cleanup plan	
Task 4 – Site Cleanup	
b. Project Implementation, EPA-funded tasks: Port will competitively procure a remediation contractor in compliance with 2CFR 200.317-326, which Project Manager will oversee with QEP assistance. Contractor cleanup activities will include soil capping and stormwater infrastructure development. QEP will work with Port to ensure cleanup meets City, state, federal regulations and that Site advances toward regulatory closure in accord with 2023 DEQ Record of Decision. Non-EPA grant resources needed to carry out tasks: See 1.e-g.	
c. Anticipated Project Schedule: Procure contractor by Aug 2027. Begin cleanup Oct 2027, complete on/before June 2028. Continue monitoring through September 2030.	
d. Task/Activity Lead: Contractor; Assist: Port, QEP	
e. Outputs: 8.9 acres of capped land; immediate land available for 2.6-mile trail development; ~25 acres available for industrial reuse (includes 17 acre portion with pre-existing DEQ NFA issued in 2008) available for industrial reuse following capping	
Notes:	
ABCA = Analysis of Brownfields Cleanup Alternatives	HASP = Health and Safety Plan
ACRES = Assessment, Cleanup and Redevelopment Exchange	QAPP = Quality Assurance Project Plan
	R10 EPA = EPA Region 10

3.F. COST ESTIMATES

The Port does not propose to use EPA funds to support subawards, participant support costs or indirect costs. Costs have been developed by the Port based on current consultant rates.

Table 7. 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	Personnel	12,415	11,960	7,800	10,400	42,575
	Fringe Benefits	4,966	4,784	3,120	4,160	17,030
	Travel	13,707	-	-	-	13,707
	Supplies	-	896	-	-	896
	Contractual	29,200	26,400	220,000	320,000	595,600
	Construction	-	-	-	3,260,192	3,260,192
	Other	-	-	30,000	40,000	70,000
Total Direct Costs		60,288	44,040	260,920	3,634,752	4,000,000
Indirect Costs*		-	-	-	-	-
Total Budget (Direct + Indirect Costs)		60,288	44,040	260,920	3,634,752	4,000,000

Table 8. Cost Estimate Table

Task	Cost Basis and Assumptions (Avg. Rate \$65/hr + 40% fringe for Port = \$91/hr; \$200/hour for QEP)
1. Project Management	<p><u>Personnel and Fringe Total = \$17,381 (Personnel = \$12,415 + Fringe (40%) = \$4,966).</u> Review QEP-prepared monthly summaries and generate quarterly reports (1h/quarter x 15 quarters = 15 hrs x \$65/hr + 40% fringe = \$1,365); attend 48 team meetings (1.5h/mo x 48 months = 72 hrs x \$65/hr + 40% fringe = \$6,552); review annual reports (2h/year x 4 years = 8 hrs x \$65/hr + 40% fringe = \$728); financial mgmt (2h/month x 48 months = 96 hrs x \$65/hr + 40% fringe = \$8,736)</p> <p><u>Travel Costs for Three Port staff: \$13,707.</u> National Brownfields Training Conference (1 conference, estimated at \$300 flight + \$300 hotel/night x 3 nights = \$900 lodging + \$75/day MIE x 3 days = \$225 MIE + \$300 registration) = \$1,725/person x 3 people = \$5,175). Regional Brownfields Conferences (Estimated at \$168 for 150 miles roundtrip + \$250 hotel/night x 2 nights = \$500 lodging + \$65/day MIE x 2 days = \$130 MIE +\$150 registration = \$948/person x 3 conferences x 3 people = \$8,532)</p> <p><u>Contractual Costs: \$29,200.</u> 48 project team meetings (48 x \$200/hr x 1 hr = \$9,600); 15 quarterly reports (15x \$200/hr x 2 hrs = \$6,000); Annual Federal Financial Reports (8 x \$200/hr = \$1,600); 1 grant closeout report (\$200/hr x 30 hrs = \$6,000); ACRES updates (30 x \$200/hr x 1 hr = \$6,000)</p>
2. Community Outreach	<p><u>Personnel and Fringe Total = \$16,744 (Personnel = \$11,960 + Fringe (40%) = \$4,784).</u> Develop PIP (12 hrs x \$65/hr + 40% fringe = \$1,092); Plan/attend 4 community outreach meetings (12h/meeting x 4 meetings = 48 hrs x \$65/hr + 40% fringe = \$4,368); Quarterly articles/website/Commission updates (4h/quarter x 16 quarters = 64 hrs x \$65/hr + 40% fringe = \$5,824); Community engagement outside meetings (60 hrs x \$65/hr + 40% fringe = \$5,460)</p> <p><u>Supplies: \$896.</u> Community open house supplies (sticky notes, voting dots, pens, markers, paper) (4 x \$224/meeting = \$896)</p> <p><u>Contractual Costs: \$26,400.</u> QEP support for Public Involvement Plan (2 hrs x \$200 = \$400); QEP support at community outreach meetings (5h/meeting x 4 meetings = 20 hrs x \$200/hr = \$4,000); Articles/media updates (2h/quarter x 16 quarters = 32 hrs x \$200/hr = \$6,400); Support Port with direct outreach and engagement with key constituencies outside of community meetings (50 hrs x \$200/hr = \$10,000); Interpretation and translation (20 hrs x \$200/hr = \$4,000); printing (\$200/meeting x 4 meetings = \$800 + \$800 for flyers, posters= \$1,600)</p>
3. Cleanup Planning	<p><u>Personnel and Fringe Total = \$10,920 (Personnel = \$7,800 + Fringe (40%) = \$3,120).</u> Review ABCA, coordinate with QEP (20 hrs x \$65/hr + 40% fringe = \$1,820); review remedial design documents (20 hrs x \$65/hr + 40% fringe = \$1,820); support for permitting (40 hrs x \$65/hr + 40% fringe = \$3,640); review site workplans (20 hrs x \$65/hr + 40% fringe = \$1,820); review final design documents, review RFP for contractor services, review bids and select contractor with support from QEP (20 hrs x \$65/hr + 40% fringe = \$1,820).</p> <p><u>Contractual Costs: \$220,000.</u> ABCA Update/Finalization (100 hrs x \$200/hr = \$20,000); Remedial design documents (500hrs x \$200/hr = \$100,000); Permitting support (200 hrs x \$200/hr = \$40,000); Develop site workplans (200 hrs x \$200/hr = \$40,000); Final design/bid support with contractor (100 hrs x \$200/hr = \$20,000)</p> <p><u>Other Costs: \$30,000.</u> DEQ design oversight (150 hrs x \$200/hr = \$30,000)</p>
4. Site Cleanup	<p><u>Personnel and Fringe Total = \$14,560 (Personnel = \$10,400 + Fringe (40%) = \$4,160).</u> Oversee QEP, including site visits, meetings and correspondence (80 hrs x \$65/hr + 40% fringe = \$7,280); closeout reporting, regulatory communication, correspondence (80 hrs x \$65/hr + 40% fringe = \$7,280)</p> <p><u>Contractual Costs: \$320,000.</u> Project contracting and contractor coordination (200 x \$200/hr = \$40,000); CMMP, geotechnical evaluation, QAPP, HASP (400 x \$200/hr = \$80,000); Construction oversight (400 x \$200/hr = \$80,000); Groundwater/seep monitoring (200 x \$200/hr = \$40,000); Progress reporting (200 x \$200/hr = \$40,000); As-builts and project closeout (200 x \$200/hr = \$40,000)</p> <p><u>Construction Costs: \$3,260,192.</u> Surveying (252 hrs x \$200/hr = \$50,400); Implementation of institutional controls (250 hrs x \$200/hr = \$50,000); Waste disposal (175 hrs x \$200/hr = \$35,000); Asphalt concrete cap (241,849 x \$8/sf = \$1,934,792); Construct stormwater management catch basins (405 hrs x \$200/hr = \$81,000); Stormwater management trenching and conveyance piping (891 hrs x \$200/hr = \$178,200); Stormwater management infiltration pond (4,654 hrs x \$200/hr = \$930,800)</p> <p><u>Other Costs: \$40,000.</u> DEQ oversight (200 hrs x \$200/hr = \$40,000)</p>

Additional Port staff time will be leveraged in-kind at the rate of \$91/hour (\$65/hr salary + \$26 fringe).

3.G. PLAN TO MEASURE AND EVALUATE ENVIRONMENTAL PROGRESS AND RESULTS

The Port will use Excel to track and evaluate progress monthly, coordinating with the QEP and contractor. It will report outputs and other deliverables with ACRES quarterly progress reports and will compare quarterly achievement to output/outcome goals, so that deviations can be rapidly corrected. Anticipated outputs include constructing an almost 2.5-foot-thick cap consisting of a minimum 2-foot-thick layer of clean soil, a geomembrane and/or geotextile and a 4-inch-thick layer of asphalt; this will generate approximately 25.9 (8.9+17) contiguous acres above the 100-year floodplain that will help address a County-wide shortage of viable industrial land. Additional outputs include preventing PAHs from off-gassing, preventing surface water infiltration into contaminated soil, reducing discharge of contaminated groundwater and creosote seeps into water bodies and advancing DEQ’s planned PRB

design/installation efforts. Throughout the grant period, the Port will monitor groundwater monitoring wells and riverbanks along the Site's perimeter in early fall when movement of creosote in groundwater towards Scappoose Bay and Milton Creek is greatest due to rain, lower surface water levels, and warmer temperatures. The Port will make results available to EPA on request post-grant closure. Outcomes and eventual results include new trails and recreational amenities, newly available industrial land, reduced risk of exposure to contamination for humans and the environment, improved habitat for vulnerable species, and improved health and economic outcomes for TA residents.

4. Programmatic Capability and Past Performance

PROGRAMMATIC CAPABILITY.

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

An appointed executive director reports to the Port's five-member elected Commission and manages the Port's 19 staff. The Port's grant implementation team have successfully managed similar federally funded projects in the past (see 4.d) and possess the financial, organizational, communications and management skills necessary to successfully manage this grant. Elliot Levin, the Port's North County Operations & Terminal Manager, will be Project Director. Elliot has 35+ years' experience in the maritime industry. He has managed cleanup of P&T since 2021 and worked with DEQ to develop a cleanup plan. Elliot will coordinate with Guy Glen Jr., Executive Finance Manager, who will manage and track EPA funds and generate, approve, and submit reimbursement requests. Guy has 14 years' experience in port administration and has managed over 35 projects funded by local, state, and federal programs. Lindsay Gobel Wilson, Communications and Grants Manager, supports community engagement, communications, and partner coordination, with 20+ years of experience in communications and an educational background in environmental science. Lacey Tolles, Airport Manager & Project Specialist, has 20+ years' experience with public project administration. She will provide additional project management and administrative support, and has extensive experience with federal grant reporting.

4.c. Acquiring Additional Resources.

The Port procures an average of \$2.8 million annually in contractor services and has the staff and procedures in place to successfully acquire resources through a competitive, qualifications-based process compliant with 2CFR 200.317-200.326. Since 2014, the Port has received 15 Federal Aviation Administration (FAA) grants totaling \$9,185,166 to support capital projects at the Scappoose Airport and has repeatedly demonstrated its ability to adhere to all federal requirements, including procurement. The Port's existing administrative systems will support efficient staff transitions should unforeseen events arise, to eliminate project delays and ensure the team maintains appropriate qualifications.

PAST PERFORMANCE AND ACCOMPLISHMENTS

4.d. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance.

(1) Purpose and Accomplishments.

Three past grants most similar to this project are: 1) A \$2.73 million active grant from the Oregon Dept. of Transportation to extend Beaver Dock's pipe bridge by 1,200 feet, enabling relocation of pipes used for oil transport from the dock to a seismically stable structure. Grant period is March 2025, construction will begin in late 2027 and the grant will close by June 2028; 2) \$125,000 from Oregon Parks and Recreational Trails Program (grant period 2013-2014) to resurface 3,200 feet of paved trail at the Scappoose Bay Marine Park and replace a culvert with a bridge at trail entrance; and 3) \$2 million Connect Oregon Grant (grant period June 2014-June 2016) for the Westward Beaver Dock Extension, which created a new berth with modern mooring. Total project cost was \$6.6 million, and a private tenant funded the remaining \$4.6 million. All three grants closed successfully; all goals described were achieved.

(2) Compliance with Grant Requirements

Across all grants awarded, including those in 4.d.(1), the Port has complied with all grant reporting requirements, including complete and timely submission of workplans and programmatic, annual financial and close-out reports. All funds were utilized during the designated period of performance. In each case, the Port achieved all expected results in a timely manner and communicated these results to the funding agencies. Grants number 2 and 3 in 4.d.(1) have been completed in accordance with approved work plans, schedules and terms and conditions with no corrective actions issued. Grant number 1 in 4.d.(1) is adhering to established schedules, and the Port is expending funds and achieving and communicating results in a timely manner, meeting all reporting requirements and terms and conditions. It is on track to complete the grant within the approved project period.

THRESHOLD CRITERIA

1. Applicant Eligibility

A. APPLICANT TYPE

The Port of Columbia is a government entity and a special district established under [Oregon Revised Statute number 777](#).

Attachment: Founding/Charter Document

B. EXEMPTION FROM FEDERAL TAXATION

The Port is not a 501(c)(4) Tax Exempt organization.

2. Previously Awarded Cleanup Grants

The Port affirms it has not received any previous EPA Brownfields Cleanup grants for the proposed site or any other site.

3. Expenditure of Existing Multipurpose Grant Funds

The Port affirms it does not have a current EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Site is currently owned by the Port.

5. Basic Site Information

a) Site name: 8.9 acre section of former Pope and Talbot Site

b) Site address: The former Pope and Talbot Site is located at 1550 Railroad Avenue, St. Helens, OR 97051. The proposed Site is a portion of the former Pope and Talbot Site, located at Lat 45.840750° Long -122.811605°. It is approximately 387,850 SF (8.9 acres) in area.

6. Status and History of Contamination at the Site

a) Site contamination status (hazardous or petroleum): The site is contaminated with creosote, a hazardous substance.

b) Operational history and current use(s) of the site: A wood-treating facility operated at the site from 1912 to 1959. There is currently one building and a covered parking area on the site, which is leased to an industrial client for vehicle storage.

c) Site environmental concerns: Environmental concerns at the site include creosote contamination related to wood-treating activities.

d) Site contamination origin, nature, and extent: Contamination originates from creosote storage and wood treating facilities formerly located at the site and owned by Pope and Talbot. Creosote exists as non-aqueous phase liquid at depths of 8 to 10 feet below the surface. Rainwater infiltration is causing creosote to seep into the Multnomah Channel. Polycyclic aromatic hydrocarbons (PAHs) are volatilizing from creosote exposed to air.

7. Brownfield Site Definition

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

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

8. Environmental Assessment Required for Cleanup Grant Applications

Description of environmental assessments conducted at the site: This 8.9-acre portion of the former Pope and Talbot site was the subject of a remedial investigation (RI)/feasibility study (FS) between 1996 and 2022. The nature and extent of contamination was defined and the Site was divided into priority action areas (PAAs) as part of the RI.

Date of Phase II or equivalent: January 17, 2020

9. Site Characterization

Option b, for non-State/Tribal Environmental Authority eligible for voluntary cleanup:

The FS evaluated and recommended remedial action alternatives (RAAs) within each PAA. The focus of this application is the preferred RAA within an 8.9-acre upland PAA.

Attachment: Letter Certifying Environmental Cleanup Program Status

10. Enforcement or Other Actions

The Port affirms that there are no known ongoing or anticipated environmental enforcement or other actions related to the site.

11. Sites Requiring a Property-Specific Determination

The Port affirms that the site does not need a property-specific determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

A. PROPERTY OWNERSHIP ELIGIBILITY – HAZARDOUS SUBSTANCE SITES

i. Exemptions to CERCLA Liability

N/A

ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability

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

a) Circumstances of acquisition: The Port purchased the former Pope and Talbot site prior to establishment of the Brownfields Law.

b) Acquisition date: 1963.

c) Did disposal of all hazardous material happen prior to acquisition? Yes.

d) Affirm you have not caused/contributed to release of hazardous substances at the site.

The Port affirms it has not caused or contributed to the release of hazardous substances at the site.

e) Affirm you have not arranged for disposal/transportation of hazardous substances at/to the site.

The Port affirms it has not arranged for disposal/transportation of hazardous substances at/to the site.

iii. Landowner Protections from CERCLA Liability

N/A

iv. Sites with Hazardous Building Material That Is Not Released into the Environment

The Port affirms that there has been no release and that there is no threat of release of hazardous substance(s) from building materials into the outdoor environment based on the site conditions.

B. PROPERTY OWNERSHIP ELIGIBILITY – PETROLEUM SITES

N/A

13. Cleanup Authority and Oversight Structure

a. Description of cleanup oversight: The Port will work with DEQ to oversee cleanup at the site. The Port will acquire technical expertise in the form of a Qualified Environmental Consultant, in compliance with competitive procurement provisions of 2 CFR Sections 200.317-327 (see 15). The Port will enroll the site in a state response program.

b. If applicable: plan to acquire access to neighboring properties: Road access is through the neighboring property on a road owned and maintained by the City of St. Helens. The City of St. Helens and the Port approved an Intergovernmental Agreement in 2024, allowing the Port to access the Site to complete cleanup. The Port maintains active channels of communication with all surrounding landowners.

14. Community Notification

a. Draft ABCA

The Port provided the community an opportunity to comment on the proposed grant application and draft ABCA, in compliance with all EPA requirements. Notification was posted January 9, 2026. Please see Appendix A for required attachments.

Attachment: Draft ABCA

b. Community Notification

Attachment: Newspaper ad, Port website, Columbia County Spotlight article

c. Public Meeting documents

Attachment: Comments Received and their Responses

Attachment: Notes/Summary of Public Meeting

Attachment: Meeting Sign-In Sheet/Virtual Participant List

15. Contractors and Named Subrecipients

CONTRACTORS

Not applicable. The Port affirms that it will select contractors in compliance with the fair and open competition requirements in 2 CFR Part 200, 2 CFR Part 1500 and 40 CFR Part 33.

NAMED SUBRECIPIENTS

Not applicable.

Attachment List

Question	Attachment Name
1a	Founding/Charter Document
9b	Letter certifying environmental cleanup program status from State/Tribal Environmental Authority
14a	Draft ABCA
14b	Newspaper ad, Port website, Columbia County Spotlight article
14c	Comments from the public and applicant's responses to them
14c	Public meeting notes/summary
14c	Public meeting sign-in sheet/participant list

Please find these attachments in Appendix A: Threshold Criteria Attachments.



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

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 – Port of Columbia County
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 Port of Columbia County for the approximate 9-acre upland portion of the larger 42-acre former Pope and Talbot wood treating property in St. Helens, OR. Several site investigations have been conducted, and an Analysis of Brownfields Cleanup Alternatives was prepared for the upland priority action area (PAA). DEQ issued a Record of Decision for the property in September 2023 approving cleanup actions to address contamination. Therefore, DEQ affirms that sufficient site characterization has been performed for remedial work to begin in the Upland PAA.

The Upland PAA has been prioritized for cleanup for the environmental and economic benefits associated with remediation and potential reuse, including clean energy generation and waterfront access via the adjacent municipal trail system. These reuses align with existing plans for the City of St. Helens's 2015 Parks and Recreation Plan, broader area Comprehensive Economic Development Strategy, and the Oregon Climate Action Plan.

The Port of Columbia County purchased the property in the 1960s after all wood treating activities ceased and associated facilities were removed. In 2008, Pope and Talbot declared bankruptcy and ceased all remedial actions on the property which DEQ then declared an "orphan site". The project is under DEQ project management oversight through DEQ's industrial orphan site program (see ECSI #0959). DEQ continues to work collaboratively with the Port of Columbia County to secure funding to implement remedial actions at the property sitewide.

The EPA Brownfield Cleanup Grant will support the cleanup of hazardous substances that pose a risk to people and impede site reuse. DEQ encourages EPA to fund the \$4 million Cleanup Grant Application from the Port of Columbia County. Please contact Kara Master, DEQ's Northwest Region Brownfields Coordinator, at (503) 229-5585, if you have any questions.

Sincerely,

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

Ecc: Kara Master, DEQ NWR Brownfield Coordinator
Katie Daugherty, DEQ NWR Cleanup Project Manager
Elliot Levin, Port of Columbia County