



The Confederated Tribes of the Grand Ronde Community of Oregon
Umpqua Molalla Rogue River Kalapuya Chasta

Tribal Council
Phone (503) 879-2301
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1-800-422-0232
9615 Grand Ronde Road
Grand Ronde, OR 97347

Application Information Sheet

1. Applicant Identification:
Confederated Tribes of the Grand Ronde (CTGR)
9615 Grand Ronde Road
Grand Ronde, Oregon 97347-9712
2. Website URL:
<https://www.grandronde.org/>
3. Funding Requested:
 - a. Grant Type: Multiple Site Cleanup (the 23-acre Property is comprised of 9 "Sites" and cleanup funding is being requested for 8 of the 9 Sites that comprise the Property)
 - b. Federal Funds Requested: \$4,000,000
4. Location:
 - a. Oregon City
 - b. Clackamas County
 - c. Oregon
 - d. Tribal fee lands within the ceded territory of CTGR
5. Property Information:
tumwata village (former Blue Heron Paper Mill Site)
Sites 1, and 3 through 9
419-427 Main Street
Oregon City, Oregon 97045

A map depicting the Property and 9 Sites that comprise the Property is provided in **Attachment A.**

6. Contacts:

a. Project Director

Ryan Webb, Project Manager
 503-879-2404
 ryan.webb@grandronde.org
 9615 Grand Ronde Road, Grand Ronde, Oregon 97347-9712

b. Highest Ranking Elected Official

Cheryle Kennedy, Chairwoman
 503-879-2352
 cheryle.kennedy@grandronde.org
 9615 Grand Ronde Road, Grand Ronde, OR 97347-9712

7. Population:

Non-tribal members affected: The population of the city in which the Property is located (Oregon City, Oregon) is 37,572
 Number of Tribal members: 5,502

8. Other Factors Checklist:

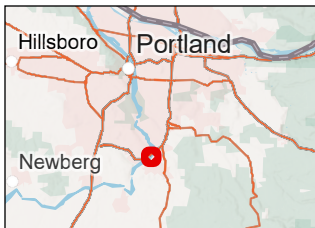
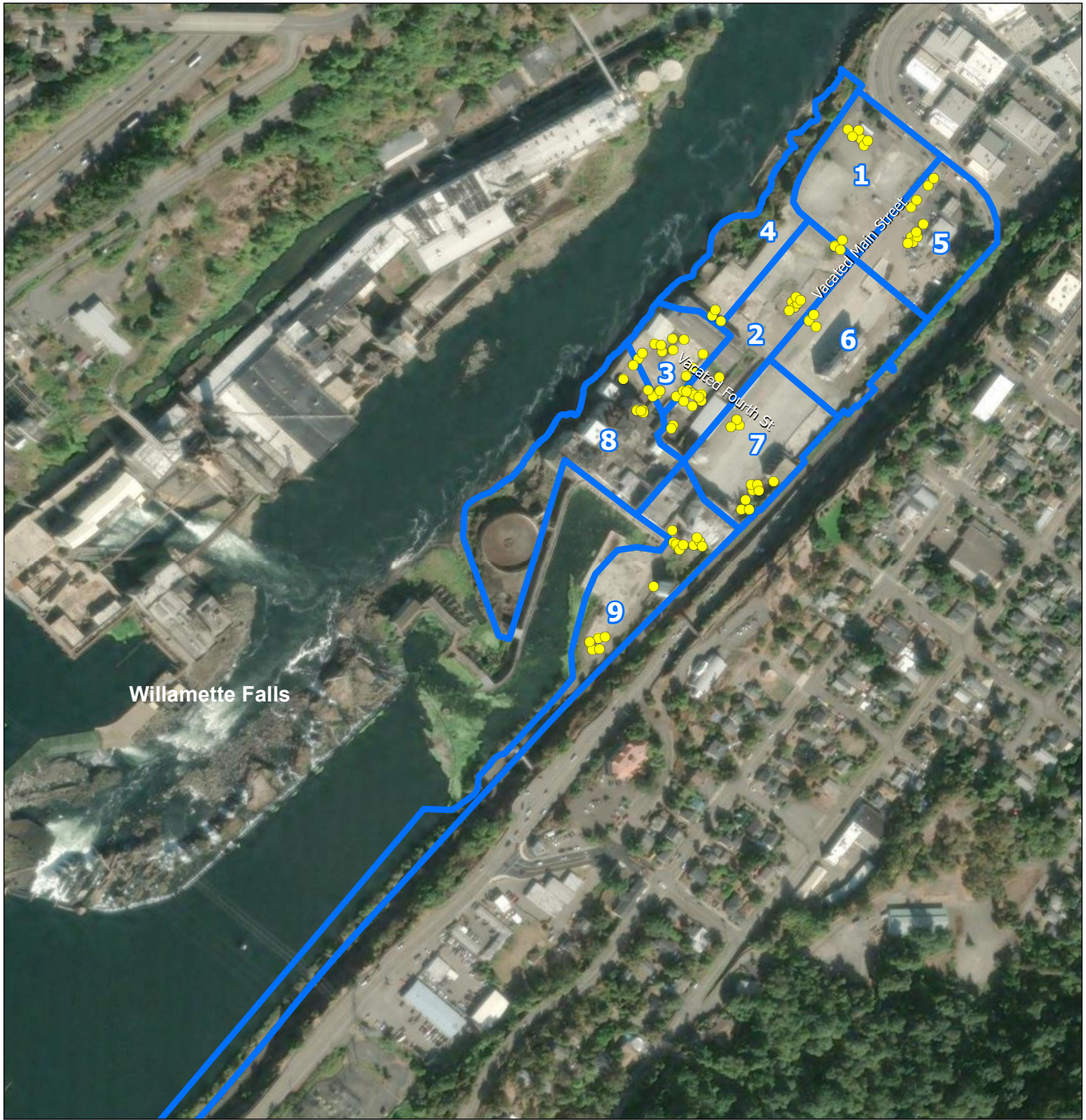
Other Factors	Page #
Community population is 15,000 or less.	4 (CTGR tribal members)
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	3 (CTGR is a federally recognized Tribe)
The proposed site(s) is impacted by mine-scarred land.	Not applicable
Secured 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 and 4
The priority site(s) is adjacent to a body of water (i.e., the border of the priority 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 Property is adjacent to the Willamette River)
The proposed site(s) is in a federally designated flood plain.	2
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Not applicable
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2015 or later) or is closing.	Not applicable


9. Releasing copies of applications: Not applicable


Application Information Sheet

ATTACHMENT A

Property Map Depicting the Nine Sites that Comprise the Property



 Parcel Boundary

 RI Borehole Locations

0 200 400
US Feet
1 inch equals 417 feet
(at original document size of 8.5x11)



Project Location
419 - 427 Main Street
Oregon City, Oregon

Prepared by NZ on : 2024-01-26
TR by EN on 2024-01-26

Client/Project

Confederated Tribes of the Grand Ronde
tumwata village

Figure No.

Title

**Parcel Boundary and Borehole
Locations Map**

Notes
1. Coordinate System: NAD 1983 2011 Oregon Statewide
Lambert Ft Intl
2. Credits: Stantec, 2023.

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

Target Area and Brownfields: 1.a. Overview of Brownfield Challenges and Description of Target Area: The *tumwata village* (former Blue Heron Paper Mill or Property) in Oregon City, Oregon (pop. 37,572) is one of the state’s most significant and anticipated brownfield redevelopment opportunities. This 23-acre vacant former paper mill sits on a rocky outcrop in the Willamette River adjacent to Willamette Falls—the second largest waterfall by volume in the U.S. and a place of deep cultural, spiritual, and ecological importance to Native Americans. The Property anchors the southern end of **downtown Oregon City (Target Area)**, which extends approximately one mile north of the Property along the river.

For generations, the Property and Target Area were a tribal gathering place. In the 1800s, Oregon City was the western terminus of the Oregon Trail, the first incorporated city west of the Rockies, and capital of the Oregon Territory. The hydropower of Willamette Falls powered 19th-century wool, flour, and paper mills, tanneries, and dye works. In the 1900s, downtown Oregon City became a commerce and government hub, and its Main Street reflected auto-oriented development patterns dominated by gas stations and auto dealers. The Blue Heron Paper Mill operated on the Property for 60 years, closing permanently in 2011.

Despite safety and security measures, the Property forms an unsafe, contaminated eyesore attracting vandalism and crime. In January 2025, trespassers started a massive fire, largely destroying one of the Property’s vacant buildings. The Property has long been a barrier between the community and the natural wonder that is Willamette Falls. Blighted Property conditions cause a ripple effect into the Target Area, with multiple vacant lots and buildings along Main Street north of the Property. Oregon Department of Environmental Quality (DEQ) records also show a string of leaking underground storage tank sites in the Target Area. Property and Target Area conditions harm the river ecosystem, deter investment and developer interest, reduce property values, and cause economic stagnation. Despite its scenic location, contamination impedes Property redevelopment with new residential and commercial development that would catalyze local and regional revitalization.

In 2019, the Confederated Tribes of Grand Ronde (CTGR) purchased the Property to steward its redevelopment. In fiscal year (FY) 2021, CTGR was awarded an \$800K EPA Brownfield Multipurpose Grant, using the funds to successfully complete environmental assessment and focused cleanup. A FY 2026 EPA Brownfield Cleanup Grant will facilitate substantial further cleanup, advancing community goals to transform the Property into a regional commercial, cultural, and recreational destination. Cleanup of the Property is a powerful opportunity to spur Target Area economic growth by promoting in-fill commercial development and cultural and recreational tourism. Cleanup and reuse will also protect and restore the local ecosystem, and reconnect the community with Willamette Falls, one of Oregon’s most beautiful and storied natural features.

1.b. Description of the Proposed Brownfield Site: The Property extends along 4,000 feet of the Willamette River with Willamette Falls located at the southern terminus of the Property. Railroad tracks and State Highway 99E form the eastern boundary. Beyond the highway the land rises to a bluff topped by a residential/commercial neighborhood. Except for a few isolated areas of vegetation along the river, the Property is paved or occupied by numerous vacant and blighted structures.

In 2019, CTGR acquired the Property after executing a Prospective Purchaser Agreement (PPA) with the DEQ agreeing to complete assessment and cleanup actions at the Property in exchange for environmental liability protections. At the time of Property acquisition, more than 50 former industrial buildings were present. Since acquiring the Property, the CTGR has demolished more than a dozen buildings in the northern portion of the Property. Using FY2021 brownfield grant funding, high priority and remedial investigation (RI) assessment has delineated areas of arsenic, lead, petroleum, polycyclic aromatic hydrocarbon (PAH), and dioxin soil contamination in discrete areas across much of the Property. In 15 areas, soil contamination exceeds DEQ screening levels protective of future Property users. Contaminant concentrations exceeding DEQ clean fill standards were detected in most Property soils, including soils planned for removal as part of the planned ecological restoration. Fortunately, basalt bedrock underlying Property soil/fill acts as a barrier preventing vertical contaminant migration and protecting Property and vicinity groundwater and the adjoining river.

Revitalization of the Target Area: 1.c. Reuse Strategy and Alignment with Revitalization Plans: Finalizing Property cleanup will advance a reuse strategy developed through years of collaborative planning. Following the paper mill closure, Oregon City, Clackamas County, Metro (regional planning agency), state agencies, and CTGR launched a robust community engagement program beginning in 2013, involving

thousands of Oregonians and resulting in four guiding Property reuse principles: economic revitalization, historic and cultural interpretation, public access, and environmental health.

Building on these principles, a Framework Master Plan (2014) established a mixed-use Willamette Falls Downtown zone in the Target Area, replacing the Property’s former industrial zoning. Subsequent efforts included a Catalytic Value Study (2015), a Riverwalk Master Plan (2018), and a Roadmap to Redevelopment (2018), each shaped by input from state and tribal government, business, nonprofits, and the community. CTGR advanced these plans in the tumwata village Master Plan¹ that hones the vision for the Property (see parcel redevelopment plans in the table below). In 2025, the OR Department of Land Conservation and Development awarded CTGR an Achievement in Community Engagement Award for the robust public engagement undertaken in completing the Master Plan. Also in 2025, the Master Plan was formally adopted by Oregon City.

The Master Plan envisions the Property as a regional destination with homes, offices, recreational and hospitality amenities, and restored natural areas. The northern end of the Property will be a vibrant extension of downtown Oregon City, with a green gateway leading to homes, shops, restaurants, and offices connected by pedestrian- and bike-friendly streets. From north to south, the Property’s character will transition from green urban form to a pedestrian-centered area with gathering and park areas, a hotel, and cafes. Public access to view Willamette Falls will be restored for the first time in nearly two centuries.

To support the reuse plan, CTGR has subdivided the Property into nine “Sites” as summarized below.

Site No.	Size (acres)	Location and Current Conditions	Redevelopment Plan
1	2.6	Adjacent to downtown Oregon City. All buildings demolished.	Office building that extends downtown Oregon City onto the Property.
2	2.7	Center of Property. Portion of buildings remain. Only parcel where cleanup occurred as part of FY 2021 Brownfield Multipurpose Grant.*	Street and public plaza at the southern terminus of the street with view of Willamette Falls.
3	1.9	Adjacent to river in northern portion of Property.	Hotel (north) and ecological restoration area (south). Also Riverwalk trail.
4	2.3	Adjacent to river in northern portion of Property.	Ecological restoration area including Riverwalk trail.
5	2.5	Adjacent to downtown Oregon City. Minor buildings remain.	Parking garage and native plant garden.
6	2.4	Adjacent to Hwy 99E in north-central portion of Property. Only parcel building was burned/demolished in 2025.	Multi-family housing.
7	2.8	Adjacent to Hwy 99E in south-central portion of Property. Multiple structures remain.	Public facing cultural interpretive center.
8	3.4	Adjacent to river in northern portion of Property.	Ecological restoration area including Riverwalk trail.
9	2.4	Adjacent to Hwy 99E in southern portion of Property. Multiple structures remain.	Tribal cultural amenities including a gathering space.

*No FY 2026 Cleanup Grant funding will be used on Parcel 2.

The southern area of the Property is located in a **federally designated floodplain**. The 2024 Grading and Floodplain Plan for the Property outlines balancing cut-and-fill during ecological restoration to increase floodplain capacity. Site reuse may incorporate stormwater management strategies including natural stormwater treatment systems that reduce contaminants and reuse water for irrigation.

The Property reuse strategy aligns with regional plans and priorities: Oregon City’s Comprehensive Plan and Downtown Urban Renewal Area prioritize Target Area development for shopping, working, tourism and recreation, social interaction, with pedestrian and bicycle access. The Oregon City Downtown Association 2024 Strategic Plan developed through extensive community surveys identifies underused properties and a lack of riverfront connection as major challenges which this project will address. Clackamas County’s Comprehensive Plan highlights a need for developable land and protecting and supporting natural features and parks. Metro’s 2040 Regional Growth Concept encourages infill development, a healthy economy, and protection of rivers and natural areas.

¹ https://www.tumwatavillage.org/wp-content/uploads/2024/09/2023-0112-WM_GBD-Tumwata_Small.pdf

1.d. Outcomes & Benefits of Reuse Strategy: Metro prepared a *Catalytic Value Study* in 2015 to assess the potential for the transformed Property to stimulate economic development. The study identified a robust set of regional economic and community benefits resulting from the Property’s planned reuse:

Job Creation and Income Tax Revenue: The Property could house up to 926K square feet of commercial space creating an estimated 2,500-5,000 temporary and permanent jobs. This could generate over \$40M in annual local income and millions in income tax revenue to be reinvested locally.²

Tourism: Oregon is a tourist destination. In 2023, visitor spending topped \$14B for the first time in state history. The Catalytic Value Study shows the redeveloped Property could attract 1M visitors annually, creating 931 tourism-related jobs and generating up to \$73M in annual visitor spending.

Property Value Impacts: The Property currently reduces nearby property values by an estimated \$2M. Studies show that brownfield redevelopment can increase surrounding values by 5–15%³, creating homeowner equity and economic stability in the Target Area. Higher property values also make redevelopment financially viable, attracting investment and catalyzing revitalization.

Park/Open Space: Property reuse will include ecological restoration, river access, and a riverwalk. Plans feature a revitalized boat dock, overnight park accommodations, and naturalized trails as well as a community space for markets and destination events framed by historic mill remnants.

Housing: The Oregon City 2021-2041 Housing Needs Analysis projects a need for 50% more housing to accommodate growth. With Oregon City projecting a 50% increase in needed housing, the Property offers a vital opportunity to sustainably expand the housing supply and ease the cost burdens residents face due to current housing shortages.

Natural Disasters: Heavy winter rains in the Target Area increase flood and landslide risks. By naturalizing a portion of the Property, redevelopment will boost floodplain capacity and enable stormwater capture and reuse.⁴ With extreme summer heat, including a 2025 extreme heat warning, regreening the Property will help cool the area and lessen energy needs for building cooling.⁵ Providing a vegetated street envelope of native plants will lower surface and air temperatures by providing shade and through evapotranspiration. Shaded surfaces can be up to 20-45-degrees (F) cooler than peak temperatures of unshaded materials.⁶

Renewable energy: Reuse plans include rooftop solar panels on newly constructed buildings.

Strategy for Leveraging Resources: 1.e. Resources Needed for Site Characterization: Using CTGR and EPA Brownfield Multipurpose Grant funding, assessment has been completed and cleanup has begun. No additional assessment is anticipated; however, if further assessment is needed, CTGR will fund this work, and has access to leveraged funding sources such as the Business Oregon Brownfield Program or Metro’s FY20 EPA Brownfield Assessment Grant.

1.f. Resources Needed for Site Remediation: The estimated total cost for the cleanup program described in this application is \$7M. The table to the right summarizes funding resources totaling \$3.5M, that when combined with a \$4M EPA Cleanup Grant will be sufficient to fund the cleanup program described in this application with a 7% contingency. Additional information regarding these cleanup funding sources is described in the table below. Documentation for all cleanup funding sources identified to the right are attached with additional details summarized below.

<i>tumwata village</i> Cleanup Funding Plan	
2022 Congressional Appropriation	\$1,000,000*
Business Oregon Loan/Grant	\$500,000
CTGR Funding	\$2,000,000*
EPA Brownfield Cleanup Grant	\$4,000,000
TOTAL	\$7,500,000
*Secured funding	

Metro FY24 EPA Brownfield Coalition Assessment Grant – Unsecured (available upon request)

Purpose: Assessment, Reuse Planning	Metro has an active \$1.5M EPA Brownfield Coalition Assessment Grant that includes the Target Area and has expressed support for funding work at <i>tumwata village</i> .
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FY22 Economic Development Initiative Congressional Appropriation - \$2M SECURED

² Conservatively assuming 2,500 part time (1,040 hrs/year) minimum wage (\$16.30/hr) jobs

³ [The Value of Brownfield Remediation | Journal of the Association of Environmental and Resource Economists: Vol 4, No 1](#)

⁴ [Cooling centers open throughout Clackamas County](#)

⁵ <https://louisvilleky.gov/sites/default/files/2020-12/louisvillefactsheet.pdf>

⁶ Environmental Protection Agency (EPA). Using Trees and Vegetation Reduce Heat Islands.

Purpose: Cleanup, Infrastructure Const.	\$1M eligible for cleanup, \$1M for demolition, and infrastructure development.
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Business Oregon Brownfield Program - \$500K

Purpose: Cleanup	The state of Oregon is committed to supporting the project and will provide loan/grant funding for cleanup through its Brownfield Program in 2028.
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CTGR Fiscal Year 2028 Funding - \$2M SECURED

Purpose: Cleanup	CTGR has budgeted up to \$2M annually for several years to further the <i>tumwata village</i> project. The letter provided in the Threshold Criteria section indicates a commitment to use planned FY28 funding for cleanup.
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1.g. Resources Needed for Site Reuse: In 2021, \$3.7M was allocated for street and utility improvements, including extending Main Street and redeveloping Water Avenue for public access. Additional resources necessary to complete all project street/utility infrastructure improvements are estimated at \$5-6M and will be completed in phases. This work will be funded using grants or by CTGR, for example, the transportation improvement program funding identified in the table below. Substantial funding (\$22.5M) has been secured for historic and cultural interpretation and public access improvements (see table below). For new commercial projects (e.g., hotel, office building, housing, etc.), CTGR may seek private partnerships with developers willing to invest in the Property and/or may invest its own funds.

2009/2017 Oregon State Parks Bond/City of Oregon City Allocation - \$12.5M SECURED

Purpose: Reuse	For reuse activities to be determined collaboratively by City of Oregon City and CTGR, likely to include in part publicly accessible Willamette Falls park areas.
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2019 Metro Parks and Recreation Bond, Large Scale Community Visions - \$20M SECURED

Purpose: Reuse	For reuse activities to be determined collaboratively by Metro and CTGR, likely to include in part publicly accessible Willamette Falls park areas.
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Highway Trust Fund 2024-2029 Transportation Improvement Program Grant – \$2M SECURED

Purpose: Reuse	This is non-competitive Federal Highway Administration funding CTGR receives annually through the Bureau of Indian Affairs for road/utility network development.
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FY26 Federal Highway Administration BUILD Grant – Application will be submitted February 2026

Purpose: Reuse	\$8M for <i>tumwata village</i> Complete Streets project for roadway, safety, accessibility, and utility infrastructure – Funding decision anticipated June 2026.
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FY25 NOAA Habitat Restoration and Coastal Resilience Grant – Application submitted 2025

Purpose: Reuse	\$10M for increasing flood storage capacity and enhancing ecosystem resilience – CTGR applied in 2025 and is awaiting funding decision.
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Oregon DLCDC Transportation and Growth Management Grants - Unsecured

Purpose: Reuse	Up to \$350K for transportation planning and implementation.
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Metro Planning & Development Grants - Unsecured

Purpose: Reuse	Up to \$750K for fostering community, housing, and job growth.
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1.h. Use of Existing Infrastructure: Because this project is true infill development adjacent to downtown Oregon City, it will capitalize on the existing infrastructure framework including utility corridors and roadway connections that adjoin the Property to the northeast. Various studies completed in evaluating redevelopment options have confirmed the adequacy of adjoining infrastructure, both street and utility, so infrastructure improvements are needed only on the Property and not beyond. However, Oregon City and the Oregon Department of Transportation are currently partnering to evaluate options for a shared-use pedestrian and bicycle path and streetscape enhancements on McLoughlin Boulevard between 10th Street and *tumwata village*. These public improvements will be carried into, and made a part of, *tumwata village*. Existing Property infrastructure requires upgrades to meet current capacity and safety standards, and the completion of these upgrades has been initiated (see 1.g. above). These new improvements (streets and utilities) will be public following their completion. In addition to CTGR’s secured funds and the eligible sources listed in Section 1.f., CTGR is well positioned to receive infrastructure grants and financing through the Oregon Special Public Works Fund, Oregon Water/Wastewater Fund, Oregon Regional Solutions Infrastructure Fund, and U.S. Economic Development Administration programs to support the completion of required Property infrastructure improvements.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT: Community Need: 2.a. The Community’s Need for

Funding: The CTGR community is very small, with just over 5,500 members. The median household income of Tribal members living on the Grand Ronde reservation is 33% of the statewide median income, and the

Table 1: Indicator	CTGR	Oregon	US
Median Household Income	\$26,667	\$80,426	\$78,538
Unemployment 2019-2023	9.2%	3.3%	3.3%
Poverty (all people)	44.9%	11.9%	12.4%
Poverty Age <18	46.9%	12.9%	16%

Source: 2023 5-Year US Census American Community Survey

poverty rate is over 3 times the statewide rate (Table 1). Unemployment in the community is also much higher than the statewide rate. Tribal funds are limited, and primarily dedicated to education, healthcare, and community support. While CTGR is fully committed to Property redevelopment, it cannot accomplish it without funding support. With its limited funds, CTGR has begun the redevelopment process, but this is an immense undertaking requiring far more funding resources than possessed by CTGR. Oregon City supports the project monetarily as

feasible (see Oregon Parks Bond funding in 1.g. above) but also does not have the revenue sources needed for this large scale cleanup. EPA grant funding for Property cleanup will allow CTGR to continue to advance Property redevelopment. The grant will help CTGR and the community by preparing the Property for new job opportunities and revenue generating uses through leases, business income, tourism spending, and destination events. Due to limited resources, CTGR and the Target Area community are unable to fund all Property cleanup and reuse making the EPA Brownfield Cleanup grant a critical component of the Property cleanup and revitalization plan.

2.b. Health or Welfare of Sensitive Populations: Homeless people are a significant sensitive population in the Target Area. In 2017, Clackamas County declared a state of emergency due to the lack of shelter for the growing homeless population after a woman died in a tent fire less than 2 miles from the Property. The population of unsheltered people in the county rose from 410 individuals in 2023 to 568 individuals in 2025, and the number of homeless children also increased.⁷ In December 2025, emergency crews rescued homeless campers stranded in high water during flooding in Clackamas County. Unhoused people may seek shelter in vacant areas like the Property, where they may be exposed to contaminants and unsafe conditions in old buildings and along the river. Although the Property is secured, people have gained access. In January 2025, trespassers sheltering in one of a vacant Property building started a massive fire. The health and welfare of the Target Area’s elderly and young residents are also at risk. 22% of Oregon City residents are under 18 and 14% are over 65. These groups may have underdeveloped or weakened immunity, making them more vulnerable to the health effects of contaminants. The young and elderly, as well as unhoused people, are also vulnerable to extreme heat. During a 2025 heat wave, Clackamas County emergency rooms and clinics recorded 101 heat-related medical visits and Clackamas County investigated the death of a 55-year-old woman in Oregon City as potentially heat-related.

This grant will remove contaminants, eliminating potential exposure of sensitive populations on and near the Property. Cleanup and reactivation of the Property will remove an attractive nuisance and will boost the local tax base allowing revenues to be directed toward addressing homelessness. The Property redevelopment plan will also increase greenspace, which will help mitigate extreme heat events, increase flood management capacity, and provide an area for the community to exercise and recreate.

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

Conditions: The most recent Clackamas County Health Assessment (census tract level data is unavailable) shows that cancer is one of the leading causes of preventable deaths in the county (Table 2).⁸ Clackamas County is in the worst 25% of Oregon counties for cancer rate among the Medicare population comprised mostly of people who are either over 65, or younger people with disabilities.⁹ The Oregon Health Authority found that Clackamas County’s 2018-2022 incidence rate for all cancers (443.6 per 100K) was

Table 2 Cancer type	Clackamas County State Percentile
All cancers	78 th
Melanoma	99 th
Breast Cancer	75 th
Childhood Cancers	96 th

Source: NIH National Cancer Institute 2017-2021

⁷ [2025 Point in Time Count](#)

⁸ [2017 Community Health Assessment Clackamas County Public Health Division](#)

⁹ [NIH National Cancer Institute 2017-2021](#)

higher than the state rate of 402.1 per 100K.¹⁰ Residents in the three census tracts closest to the Property are in the 73rd to 90th state percentiles for low life expectancy.¹¹

Known Property contaminants include carcinogens and additional substances linked to serious health risks including asbestos, dioxins, polychlorinated biphenyls, petroleum constituents such as benzene and benzo(a)pyrene, and heavy metals. Exposure to contamination in surface soil and crumbling buildings at this large brownfield may occur as they become airborne as vapor or dust or be washed from the Property into the surrounding area, and trespassers may come into direct contact with these contaminants.

The Centers for Disease Control (CDC) reports that the adult asthma rate in the Property’s census tract is 12.7%, compared to 11.2% in Oregon and 8% nationally.¹² Table 3 shows the numerous sources of air pollution which, along with Property contaminants, may be causing or exacerbating asthma and other lung conditions for Target Area residents. This grant will enable final cleanup of the Property, removing these contaminants and preparing the Property for healthy reuse.

Table 3 – Environmental Burden/Economic Indicator ¹³	Target Area* Percentile in US
Total Environmental Burden	92 nd
Air Pollution	97 th
Water Pollution	89 th
Toxics Release Inventory	82 nd
Risk Management Plan Sites	77 th
Housing Built Pre-1980	74 th
Railways	77 th
Poverty	54 th
Housing Cost Burden	67 th

2.d. Economically Impoverished/Disproportionately Impacted Populations: The Target Area is impoverished and living near one of the largest brownfields in Oregon (former Blue Heron mill). They are also exposed to a concentration of additional pollution sources including buildings built before 1980 that may contain asbestos and lead paint, and a busy highway/railroad. Target Area residents disproportionately share the negative environmental effects of industry and land use policies. The US Agency for Toxic Substances and Disease Registry (ATSDR)¹² ranks the environmental burden of the Target Area as “High” based on the risk factors in Table 3. Air pollution in the Property’s census tract is worse than 97% of US

census tracts. This overburdened population also experiences a disproportionate economic burden. The area has more households living in poverty than over half of US census tracts and has a higher housing cost burden (ratio of income to housing cost) than 67% of US census tracts.¹⁴

While in operation, the Blue Heron Mill was identified by DEQ as a major source of hazardous pollutants and was cited for multiple violations of its National Pollution Discharge Elimination System and Resource Conservation and Recovery Act (RCRA) permits due to wastewater discharges and exceedances of limits on hazardous materials generation and storage. The Property’s past RCRA reporting shows that ignitable and corrosive waste, and wastes containing arsenic, chromium, lead, mercury, and solvents were generated on the Property. This grant will aid CTGR in addressing the residual contamination left by former industrial operations on this large brownfield that is potentially impacting a community overburdened by pollution. It will also spark economic activity bringing jobs and property value benefits to low income and housing-cost burdened residents.

Community Engagement: 2.e. Project Involvement and 2.f. Project Roles:

Organization and Contact	Organization Mission	Specific Project Involvement or Assistance
City of Oregon City – Denyse McGriff, 503-656-3912, dmcgriff@orc.org	Build a dynamic community that leads the state in safety, economic opportunity, livability, and historic significance.	Advocate for the project amongst constituents and partner with CTGR in obtaining desirable project outcomes.
Citizen Involvement Committee of Oregon City – Jared Lyman, 503-496-1547, communications@orc.org	Boosting public participation in local government by providing information and training, and connecting citizens with government officials.	CIC is made up of representatives of Oregon City’s neighborhood associations. CIC will share project information through their established communication networks.

¹⁰ [Oregon Health Authority](#)

¹¹ Policy Map

¹² [CDC Places Database](#) accessed January 2026 and [CDC Website](#) accessed January 2026

¹³ ATSDR Place and Health GRASP Database <https://www.atsdr.cdc.gov/place-health/php/eji/eji-explorer.html>

*Represented by Census Tract 41005022400 which includes the Site

¹⁴ US Census 2023 American Community Survey 5-yr Data

Downtown Oregon City Association Juliana Allen, 503-802-1640, admin@downtownoregoncity.org	To build community and cultivate commerce in downtown Oregon City.	This non-profit organization focused on the revitalization of Oregon City’s 175-year-old downtown will assist with outreach and provide input to help align Property reuse plans with the downtown neighborhood.
Clackamas County Public Health Erika Zoller, 503-502-1243, ezoller@clackamas.us	Protecting and promoting the community's health by advancing health resources, addressing needs from mental health and substance abuse to chronic disease.	The County Health Department will assist with outreach to sensitive populations and establishing metrics to track project outcomes.
Willamette Riverkeeper Heather King – 503-223-6418 heather@willametteriverkeeper.org	To protect and restore the Willamette River.	Willamette Riverkeeper will represent environmental interests in the project.
Business Oregon – Jerry Sorte, 971-345-7401, jerry.sorte@biz.oregon.gov	Use state and federal funding sources to advance brownfield redevelopment and economic development.	Provide cleanup loan or grant funding and technical support to the project
Oregon DEQ - Mark Pugh , 503-229-5587, pugh.mark@deq.state.or.us	Advancing environmental protection for all communities and ecosystems in Oregon.	The Tribe will continue to work closely with DEQ to ensure assessment and cleanup activities comply with state requirements and standards.
Metro – Brian Harper, 575-571-5503, brian.harper@orgegonmetro.gov	Metro is a regional government agency that crosses city borders to create efficiencies and a shared vision for the Portland Metropolitan area.	Provide brownfield and Riverwalk funding and technical support for the project.

2.g. Incorporating Community Input: CTGR will continue robust engagement with project partners from ongoing planning efforts and EPA grants. Upon award, CTGR will prepare a grant-specific Public Involvement Plan (PIP) to guide and track outreach efforts specific to grant activities. The PIP will document methods for harnessing the experience, tools, methods, and networks established over the long history of community engagement around the Property. The PIP will include a schedule of grant-specific outreach events, methods for publicizing grant news and announcements and identify project partners and roles.

Community engagement specific to EPA brownfield grant funding began in 2020 as part of CTGR’s multipurpose grant, and most recently with a virtual public meeting specific to this application on January 26, 2026. Community members attended the event to learn about and share ideas around how the grant can help shape and advance the Property’s revitalization plans. CTGR will host at least three additional grant-related public events during the grant term to inform the public and solicit input. The events will be held at key milestones that may include when news of a grant award is received, at cleanup startup, and when cleanup has been completed. CTGR is able to hold public meetings in person or virtually to accommodate community members with limited mobility. CTGR can also record presentations for posting on Tribal and partner websites. CTGR will prepare signage for display during the project to inform the public about the activity and noting that it was funded by an EPA brownfield grant.

Project information will be shared with the Tribal and Target Area communities on at least a quarterly basis during the grant term via presentations at community meetings/events and/or through CTGR’s newspaper (Smoke Signals), press releases, fact sheets, the project-specific webpage on CTGR’s website, CTGR’s social media pages, and through community partner networks, social media outlets, and events.

Community input will be gathered using tools including electronic polling and electronic surveys at events, capturing input during presentations/public meetings, and from comments provided directly to CTGR via website comments, emails, and phone calls. CTGR will compile community input from these sources on a quarterly basis and develop responses for posting and publicizing via tools like Frequently Asked Questions posted on CTGR’s website and fact sheets and articles posted at community-accessible locations addressing specific issues, questions, and suggestions. CTGR’s responses to input will be summarized in the quarterly project progress reports and in communications with the community.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS: 3.a. Proposed Cleanup Plan: The cleanup plan includes two discrete cleanup actions/areas that will mitigate soil contaminated with arsenic, lead, petroleum, PAHs, and/or dioxins.

Soil Hot Spot Cleanup: Excavation and off-Property disposal of approximately 20,000 cubic yards of contaminated soil from 15 areas in Sites 1 and 3-9 delineated during the RI where contamination exceeded DEQ screening levels protective of human health. Most excavated soils will be transported to a RCRA Subtitle

D landfill for disposal but defined, limited areas of soil with higher contaminant levels require disposal at a hazardous waste (RCRA Subtitle C) landfill. Confirmation soil sampling will be completed following soil remediation in each area.

Ecological Restoration Area Cleanup: Excavation and off-Property disposal of approximately 108,000 cubic yards of contaminated soil from Sites 3 and 8 where contamination in soil exceeded DEQ screening levels for ecological receptors, and/or DEQ clean fill criteria. Due to lower contaminant concentration in these soils, CTGR will be seeking a Solid Waste Beneficial Use Determination from the DEQ Solid Waste Program, which may allow for contaminated soil reuse, under strict controls, at a former gravel quarry or similar facility. Testing of contaminated soil during removal will be completed to confirm appropriate disposal. Confirmation soil samples will be collected following soil remediation activities where soil remains (excavation to bedrock is planned in much of the ecological restoration area).

3.b., c, d, and e: Description of Tasks/Activities and Outputs: EPA funded activities are described below.

TASK 1: PROJECT MANAGEMENT	Lead: CTGR assisted by QEP
<p>Implementation: CTGR will monitor project scope, schedule, budget, and compliance with grant terms and conditions including timely reporting and drawdowns. After grant award but prior to the start of the grant term, CTGR will procure a Qualified Environmental Professional (QEP) through an EPA procurement compliant process. Early procurement of the QEP will ensure that CTGR and the QEP can begin grant activities at the very start of the grant term. Supported by its QEP, CTGR will prepare an EPA compliant Request for Proposal (RFP) to select a remediation contractor.</p> <p>Project management activities also will include: 1) quarterly reporting; 2) annual financial reporting; 3) entries in the EPA Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; and 4) grant closeout reporting. CTGR will attend two brownfield conferences during the grant term, but all conference fees and travel costs will be paid by CTGR.</p>	
<p>Schedule: CTGR will complete all quarterly and annual reporting on time. CTGR anticipates selecting a QEP prior to 10/1/26, and a remediation contractor prior to 3/1/27. CTGR will complete a grant closeout report within 90 days of end of the grant term.</p>	
<p>Outputs: Quarterly reports (16); EPA ACRES database updates at project milestones (4); annual financial reports (4); grant closeout report (1); and RFPs for QEP and remediation contractor.</p>	
TASK 2: COMMUNITY ENGAGEMENT	Lead: CTGR assisted by the QEP
<p>Implementation: 1) Prepare Public Involvement Plan (PIP); 2) Hold at least three community meetings (virtual or in-person) during the grant term and post recordings of virtual meetings on CTGR and partner websites; 3) Prepare outreach materials including fact sheets, press releases, website/Facebook page project updates, articles in CTGR’s Smoke Signals independent newspaper publish twice monthly in print and online, and signage explaining project activities; and 4) Solicit and respond to community input via electronic surveys, interactive community events such as workshops and charrettes, Q&A at outreach events, and calls and emails from community members to grant project representatives at the Tribe; document input and responses on Q&A summary sheets and in quarterly progress reports to EPA.</p>	
<p>Schedule: The PIP and initial fact sheet will be finalized in the first quarter of the grant term. Three public outreach events will be held at the following key project milestones: 1) project kick-off; 2) cleanup startup, and 3) project completion. Press releases will also be prepared for the same project milestones and to publicize outreach events. CTGR has already established a project webpage on its website (https://www.grandronde.org/government/economic-development-program/tumwata-village/) and will add news and documents as they become available throughout the grant term. Inputs and responses will be documented on at least a quarterly basis.</p>	
<p>Outputs: PIP (1); community meetings held and notes/presentation materials developed (3); 2-3 project fact sheets and press releases/news articles; project updates on CTGR and partner websites (4); documentation of public input/questions and responses.</p>	
TASK 3: CLEANUP	Lead: QEP directed by/reporting to CTGR
<p>Implementation: <u>QEP:</u> 1) Finalize ABCA and prepare Remedial Action Plan (RAP); 2) coordinate with DEQ’s Voluntary Cleanup Program; 3) prepare and obtain EPA approval of sampling and analysis plan</p>	

(SAP)/quality assurance project plan (QAPP) for soil sampling; 4) assist with NHPA, Endangered Species Act, and Davis Bacon Act compliance; 5) prepare health and safety plan (HASP); 6) oversee/direct cleanup contractor during remedial action implementation; 7) conduct archaeological monitoring; 8) oversee soil sampling; and 9) prepare draft/final cleanup reports. Cleanup Contractor: 1) prepare all pre-work submittals (HASP, traffic management plan, 1200C stormwater permit, etc.) for review/approval by CTGR/QEP; 2) mobilize to Property and implement all required best management practices (erosion control measures, etc.); 3) excavate and load all hot spot soils and transport to RCRA Subtitle D or C landfills in accordance with the RAP; 4) excavate and load all ecological restoration contaminated soils and transport to the facility identified in the DEQ-approved RAP; 5) assist the QEP in collecting soil samples; 6) provide all soil disposal documentation and provide to CTGR/QEP; 7) complete all post-cleanup Property restoration activities; and 8) maintain compliance with Davis Bacon Act and other applicable federal regulations.
Schedule: Finalize ABCA and RAP with DEQ approval by 9/1/27; Finalized SAP/QAPP by 9/1/27; Contractor and QEP pre-remediation submittals by 12/1/27; NHPA process completion by 2/1/28; Start remedial action by 5/1/28 and complete remedial action by 9/15/28; Complete final cleanup report by 12/30/28; Complete all project close-out requirements by 9/30/29 (or earlier).
Outputs: Final ABCA; RAP; QAPP/SAP; HASPs and other pre-work submittals; Endangered Species Act, NHPA, and Davis Bacon Act documentation; Draft/Final Cleanup Report.

3.f. Cost Estimates: The budget below was prepared with the assistance of an environmental professional knowledgeable about the Property and remediation costs. The budget in the table reflects tasks to be covered by EPA Brownfield Grant funding only. The contractual budget assumes an average QEP hourly rate of \$160/hour.

Budget Categories	Project Tasks (\$)				Total
	Task 1 Project Management	Task 2 Community Engagement	Task 3 Cleanup	Admin. Costs	
Personnel, etc.*	\$0	\$0	\$0	\$0	\$0
Contractual (QEP)	\$32,000	\$24,000	\$144,000	\$0	\$200,000
Consturction (Cleanup Contractor)	\$0	\$0	\$3,800,000	\$0	\$3,800,000
Total Direct Costs	\$32,000	\$24,000	\$3,944,000	\$0	\$4,000,000
Total Indirect Costs	\$0	\$0	\$0	\$0	\$0
TOTAL BUDGET	\$32,000	\$24,000	\$3,944,000	\$0	\$4,000,000

* CTGR will cover personnel, fringe benefits, travel, equipment, supplies, conference fees, and costs for DEQ oversight with CTGR funds. Further, CTGR will not seek compensation for indirect costs.

Task 1 - Project Management, Total \$32,000: QEP Labor: \$32,000. Estimates for Task 1 deliverables include: QPRs - \$5,120 (2 hrs ea. for 16 QPRs); FFRs (done by CTGR); ACRES updates - \$2,560 (4 hrs ea. for 4 updates); Closeout report - \$6,400 (40 hrs); Misc. project management - \$17,920 (112 hrs).

Task 2 - Community Involvement, Total \$24,000: QEP Labor: \$24,000. Estimates for Task 2 deliverables include: PIP - \$4,800 (30 hrs); Community meetings - \$7,680 (16 hrs ea. for 3 meetings); Project outreach materials - \$6,400 (40 hrs); Website content support - \$5,120 (32 hrs).

Task 3 - Cleanup, Total \$3,944,000: QEP Total \$144,000: QEP Labor/Expenses: \$144,000. ABCA - \$6,400 (40 hrs); RAP - \$19,200 (120 hrs); QAPP/SAP - \$4,800 (30 hrs); HASP and other pre-work submittals - \$6,400 (40 hrs); NHPA - \$6,400 (40 hrs); Cleanup oversight including Davis Bacon compliance - \$65,600 (410 hrs); Cleanup Report - \$19,200 (120 hrs). Confirmation sample lab testing: \$16,000 (100 samples @ \$160/sample). **Remediation Contractor: \$3,800,000:** Soil hot spot cleanup (nonhazardous): \$1,881,000 (19,800 yd³ x \$95/yd³); Soil hot spot cleanup (hazardous): \$30,000 (200 yd³ x \$150/yd³); Ecological restoration soil cleanup: \$1,889,000 (41,065 yd³ x \$46/yd³). An additional \$3M in funding to complete ecological restoration soil cleanup has been secured as described in 1.f. of this application.

3.g. Plan to Measure and Evaluate Environmental Progress and Results: The RAP will contain a detailed cleanup schedule of key project milestones such as remediation contractor procurement, outreach event

dates, cleanup start date, and cleanup completion date. The QEP will utilize Microsoft Project or equivalent to track and evaluate budget and schedule in achieving RAP outputs and milestones. This will be done a minimum of weekly throughout cleanup implementation. CTGR with support from the QEP will document project outputs and outcomes in each quarterly progress report submitted to EPA and in EPA’s ACRES database (updated 1-2 times annually). Anticipated outputs are described in Section 3b. Anticipated outcomes that CTGR will track include:

<p>Environmental Outcomes:</p> <ul style="list-style-type: none"> • Volume of contaminated soil removed • Number of acres ecological restoration completed to improve habitat • Amount of energy savings from green remediation measures 	<p>Economic Outcomes:</p> <ul style="list-style-type: none"> • Number of permanent and temporary jobs created • Number of acres of land readied for redevelopment • Increase in local property values and tax revenues • Amount of funding leveraged
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4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE: 4.a. Organizational Structure and 4.b. Description of Key Staff:

The CTGR operates under a government led by an elected nine-member Tribal Council, overseeing various departments and programs like Engineering and Planning, Economic Development, Cultural Resources, Education, Social Services, and Health. The Engineering and Planning Department, led by Ryan Webb, will lead cleanup grant implementation with support from multiple additional departments.

Ryan Webb, PE Engineering and Planning Manager with the CTGR is the Project Director for this grant. Mr. Webb has 15 years of experience managing projects within the Portland Metro area, including the CTGR’s FY2021 EPA Multipurpose Brownfield Grant project. Mr. Webb also will receive significant support from **Kristen Svicarovich, PE** in all aspects of project implementation, the same role Ms. Svicarovich fulfilled during implementation of CTGR’s FY2021 grant. **Stacia Hernandez**, Chief of Staff for CTGR, will coordinate all public and community outreach efforts and lead collaboration efforts with project partners. Ms. Hernandez is a CTGR Tribal member and has been employed by CTGR for over 16 years. **Wendy Sparks**, Grants Program Manager for CTGR, will assist with grant management, compliance, and reporting. Ms. Sparks has 25 years’ experience with federal grants. **Trish Squires**, Controller, will assist with budget tracking, documentation, reporting, and drawdowns. CTGR staff will coordinate with staff in the lands, natural resources, Tribal historic preservation office, and other departments as needed.

4.c. Acquiring Additional Resources: CTGR has a procurement ordinance and policy governing purchases of goods and services that sets forth the competitive selection processes. The procurement policy requires compliance with any federal funding source requirements with respect to purchasing and program compliance. CTGR will comply with EPA’s solicitation clauses (2CFR Part 200 and 2CFR Part 1500) in the performance of this grant. The CTGR’s legal department reviews contracts and agreements and its procurement department facilitates purchase orders and payments. CTGR will utilize the required procurement procedures in selecting a QEP and remediation contractor to complete grant work.

Past Performance & Accomplishments:

4.d. Currently Has or Previously Received an EPA Brownfields Grant: CTGR was awarded an \$800K FY2021 Brownfields Multipurpose Grant by the EPA. The project period for this grant ends 9/30/26.

4.d.(1) Accomplishments: Programmatic work completed under the grant has included: 1) all reporting activities and ACRES database entry; 2) community engagement activities; 3) QAPP/SAP completion; 4) HASP completion; and 5) NHPA and Endangered Species Act requirements. Grant-funded work completed at the Property consisted of two primary assessment activities and one primary cleanup activity. **High Priority Assessment:** Actions completed as part of this assessment activity included: 1) underground utility mapping and sediment sampling (Sites 2, 3, & 8); 2) former bleach plant waste pile sampling (Site 9); 3) an inventory of chemicals remaining at the Property (all Sites); and 4) the assessment of two underground storage tank (UST) areas (Site 2). **Focused RI:** This assessment was completed in Property Sites 1-9. A total of 15 areas were assessed and the quantity of contaminated soil in each estimated. **Cleanup Based on Assessment Findings:** A soil cleanup was completed on Site 2 at the location of two USTs discovered during site assessment activities. Cleanup objectives were to complete source removal and to minimize the potential for petroleum migration.

4.d.(2) Compliance with Grant Requirements: CTGR has successfully complied with all aspects of its Cooperative Agreement terms and conditions and work plan. A QEP was procured in accordance with 2CFR Part 200 and 2CFR Part 1500. All quarterly and annual reporting to date has been completed on schedule and all project ACRES reporting was timely completed. CTGR anticipates completing project close-out in advance of the project period end date of 9/30/26.

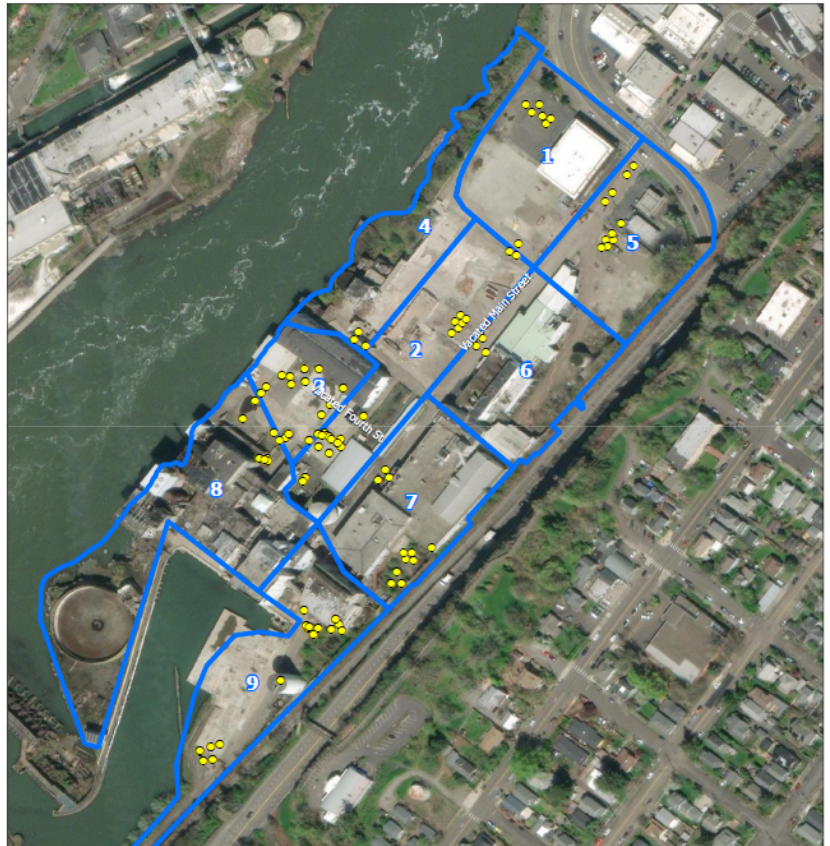
Threshold Criteria FY26 EPA Brownfield Cleanup Grant

1. Applicant Eligibility

- a. The applicant, Confederated Tribes of the Grand Ronde (“Applicant,” or “CTGR”), is a federally recognized Indian Tribe and eligible to receive this grant.
- b. Applicant is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

CTGR was awarded a United States Environmental Protection Agency (EPA) Brownfield Multipurpose Grant in fiscal year (FY) 2021 for the *tumwata village* (former Blue Heron Paper Mill property, or “Property”). The Property is comprised of nine “Sites” designated based upon the planned phasing of Property redevelopment. Cleanup funded by the CTGR’s FY2021 multipurpose grant was conducted exclusively on Site 2. As a result, CTGR understands that this Site is not eligible to receive additional EPA cleanup grant funding. However, all other Sites have not received funding from a previously awarded EPA Cleanup or Multipurpose Brownfield Grant. A map depicting the Property and each of the nine Sites comprising it is provided to the right.



3. Expenditure of Existing Multipurpose Grant Funds

CTGR has an open \$800K FY2021 EPA Brownfields Multipurpose Grant. As of October 1, 2025, CTGR had drawn down \$795,667.06 or 99.4% of this grant. An Automated Standard Application for Payments report documenting this drawdown is provided in **Attachment A**.

The Property has been subdivided into nine Sites. Threshold criteria responses are made collectively below for these nine Sites, except when responses for individual Sites differ.

4. Property Ownership

CTGR acquired the Property (all nine Sites) on August 14, 2019.

5. Basic Property Information

- a. Property Name: *tumwata village* (former Blue Heron Paper Mill)
- b. Property Address: 419-427 Main Street, Oregon City, Oregon 97045

6. Status and History of Contamination at the Property

- a. Environmental assessment activities completed at the Property have confirmed releases of commingled hazardous substance and petroleum contaminants, with more than 51% of contamination being hazardous substances.
- b. The Property is one of the oldest industrial sites in Oregon. Willamette Falls Woolen Mill was opened on the Property in 1857 and Oregon City Woolen Mill began operations in 1862. In the 1860s, paper mills began operating on the Site, using the water power from the adjoining Willamette Falls. Other notable past Site operations included a tannery and soap manufacturing, at least three bleach houses, two dye houses, laundry operations, several large aboveground fuel storage tanks, two electrical substations, a former transformer “field”, tailraces, rail spurs, and large chemical storage areas and stockpiles. There are currently no operations on the Property.
- c. Remedial investigation activities at the Property were completed in 2025. Completion of a *Soil and Groundwater Remedial Investigation Report* is anticipated in the first calendar quarter of 2026. Soil hot spot areas identified on the Property, excluding soil hot spots located on Site 2, which is not eligible to receive cleanup grant funding, include the following.
 - i. An estimated 500 cubic yards of lead-contaminated soil is present in the Bleach Plant Waste Pile area located on Site 9, 200 cubic yards of which is a characteristic hazardous waste (F008).
 - ii. An estimated 1,000 cubic yards of polycyclic aromatic hydrocarbon- (PAH-) contaminated soil is present in the Former Truck Dump area on Site 5.
 - iii. An estimated 500 cubic yards of PAH-contaminated soil is present in the Building 1 West Parking Lot area on Site 1.
 - iv. An estimated 500 cubic yards of PAH-contaminated soil is present in the Vacated 3rd Street area on Site 1.
 - v. An estimated 2,000 cubic yards of petroleum hydrocarbon-, arsenic-, and PAH-contaminated soil is present in the Vacated 4th Street area on Sites 3 and 4.
 - vi. An estimated 500 cubic yards of PAH-contaminated soil is present in the Vacated Main Street area on Site 7.
 - vii. An estimated 5,000 cubic yards of lead- and arsenic-contaminated soil is present east of Building 41/42a on Site 7.
 - viii. An estimated 5,000 cubic yards of lead-contaminated soil is present in the Weld

Shop area on Site 9.

- ix. An estimated 2,500 cubic yards of lead- and PAH-contaminated soil is present in the Sulfite Plant area on Site 9.
- x. An estimated 500 cubic yards of lead-contaminated soil is present in the Main Plaza and Carpentry Shop area on Site 3.
- xi. An estimated 1,000 cubic yards of PAH-contaminated soil is present in the Former Above Ground Storage Tank Location Near the South Substation and Recovery Boiler on Site 3.
- xii. An estimated 1,500 cubic yards of dioxin contaminated soil is located in the area between the Pipe Shop, Mill O, and Carpentry Shop on Site 3.

The latest phase of subsurface environmental assessment at the Property has also determined that most soil at the Property outside of soil hot spot areas also is contaminated, but at lower concentrations. However, the detected concentrations generally exceed DEQ clean fill screening criteria. In the area of the Property where ecological restoration activities are planned (Sites 3 and 8), it is estimated that 110,000 cubic yards of soil (excludes hot spot soil located in the ecological restoration area) that will be excavated and transported off Property for disposal must be managed as a solid waste due to DEQ clean fill screening criteria exceedances.

- d. The Property became contaminated because of many different industrial processes over the course of more than 150 years of industrial use, primarily paper manufacturing. The documented nature and extent of identified contamination is described above in Section 6(c).

7. Brownfield Site Definition

CERCLA § 101(39)(A) defines a brownfield site as “real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.” All nine sites comprising the Property both individually and collectively meet this definition.

- a. The Property is not listed or proposed for listing on the National Priorities List.
- b. The Property 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 Property is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

Multiple Phase II ESA reports that generally comply with ASTM E1903-19 have been completed at the Property including investigations by Bridgewater in 2011, Environmental Resources Management in 2012, Maul Foster Alongi in 2017 and 2018, and Apex Companies LLC in 2018. The most comprehensive ASTM E1903-19 Phase II ESA report for the Property was completed by WSP Environmental on February 26, 2024 and was entitled

Draft Soil and Groundwater Remedial Investigation Report. This draft report is currently being updated/ revised to include additional environmental assessment work completed on the Property in 2024 and 2025.

9. Site Characterization

- a. CTGR is not a State or Tribal Environmental Authority
- b. A letter from the Oregon Department of Environmental Quality is provided in **Attachment B**.

A sufficient level of site characterization has been completed for the remediation work to begin on the Property. A report documenting this site characterization has been drafted and will be finalized during the first calendar quarter of 2026 and well before June 15, 2026.

- c. The Property is already enrolled in the DEQ Voluntary Cleanup Program.

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the Property for which brownfields grant funding is being sought.

11. Sites Requiring a Property-Specific Determination

None of the special classes of property that require a property-specific determination apply to the Property. Therefore, CTGR affirms that the Property does not need a property-specific determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

The Property is contaminated with co-mingled hazardous substances and petroleum contaminants. The predominant contaminant (greater than 51%) is hazardous substances. Therefore, this section responds to CERCLA liability threshold criteria.

- a. Property Ownership Eligibility – Hazardous Substance Sites: CTGR is a federally-recognized Indian Tribe and is therefore exempt from demonstrating that they meet the requirements of a CERCLA liability defense.

13. Cleanup Authority and Oversight Structure

CTGR has already enrolled the Property in the DEQ Voluntary Cleanup Program and has been working with the DEQ for several years. The DEQ Project Manager for the Property is Mark Pugh. Participation in the DEQ Voluntary Cleanup Program ensures adequate oversight of the cleanup at the Property. It is not anticipated that access to adjacent or neighboring properties will be necessary to complete cleanup response activities.

14. Community Notification

- a. Draft Analysis of Brownfield Cleanup Alternatives: A Draft Analysis of Brownfield Cleanup Alternatives (ABCA) is provided in **Attachment C**.

- b. Community Notification Ad: A public notification add was run in The Oregonian Newspaper on January 11, 2026. A signed affidavit to this effect is provided in **Attachment D**.
- c. Public Meeting: A public meeting was held on January 26, 2026 at 6PM to discuss the draft application and consider public comments. The following are provided in **Attachment D**: i) no comments were received in response to the community notification add or during the public meeting and therefore no summary of comments or comment responses is provided; ii) the presentation given at the meeting as a summary of public meeting content; and iii) a meeting sign-in sheet.
- d. Submission of Community Notification Documents:
 - i. A copy of the Draft ABCA is provided in **Attachment C**.
 - ii. A copy of the ad demonstrating solicitation for comments on the application and public notification is provided in **Attachment D**. No public comments on the application were received in response to the community notification ad or during the public meeting.

15. Contractors and Named Subrecipients

- a. Contractors: Not applicable
- b. Named Subrecipients: Not applicable