



R10-26-C-009

January 26, 2026

Terri Griffith
U.S. EPA Region 10 Headquarters
1200 Sixth Avenue, Suite 155
Mailstop: ECL-133
Seattle, Washington 98101

Re: FY2026 USEPA Brownfields Cleanup Grant Proposal
City of Kelso, Washington

Dear Ms. Griffith:

The City of Kelso, Washington is submitting the enclosed application for a U.S. EPA Brownfields Cleanup Grant for the Koppe Metals Site. The following applicant information is provided as specified in the Grant Guidelines:

1. Applicant Identification	City of Kelso Kelso City Hall PO Box 819 Kelso, WA 98626
2. Website URL	https://www.kelso.gov/
3. Funding Requested	a. Grant Type: Single Site Cleanup b. Federal Funds Requested: \$2,745,900
4. Location	Kelso, Cowlitz County, Washington
5. Property Information	Koppe Metals site 1610 South River Road Kelso, Washington 98626 Site Vicinity Map is attached to this Application Information Sheet.
6. Contacts	Project Director and Highest-Ranking Official Andrew Hamilton City Manager 203 South Pacific Avenue Kelso, WA 98626 AndrewH@kelso.gov (360) 423-1371 Ext. 3300
7. Population	City of Kelso: 12,697 (ACS2023 estimate)

8. Other Factors	The Other Factors Checklist is provided below.
9. Releasing Copies of Application	N/A – Application does not have confidential, privileged, or sensitive information.

Other Factors Checklist

Applies	Other Factors	Page #
X	The community population is 15,000 or less.	1, 4, 5
	The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
	The priority site(s) is impacted by mine-scarred land.	
	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.	
X	The priority site(s) is adjacent to a body of water.	1 - 4
X	The priority site(s) is in a federally designated flood plain.	1, 3
X	The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
X	The reuse of the priority site(s) will incorporate energy efficiency measures.	3
X	The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters	6
	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.	

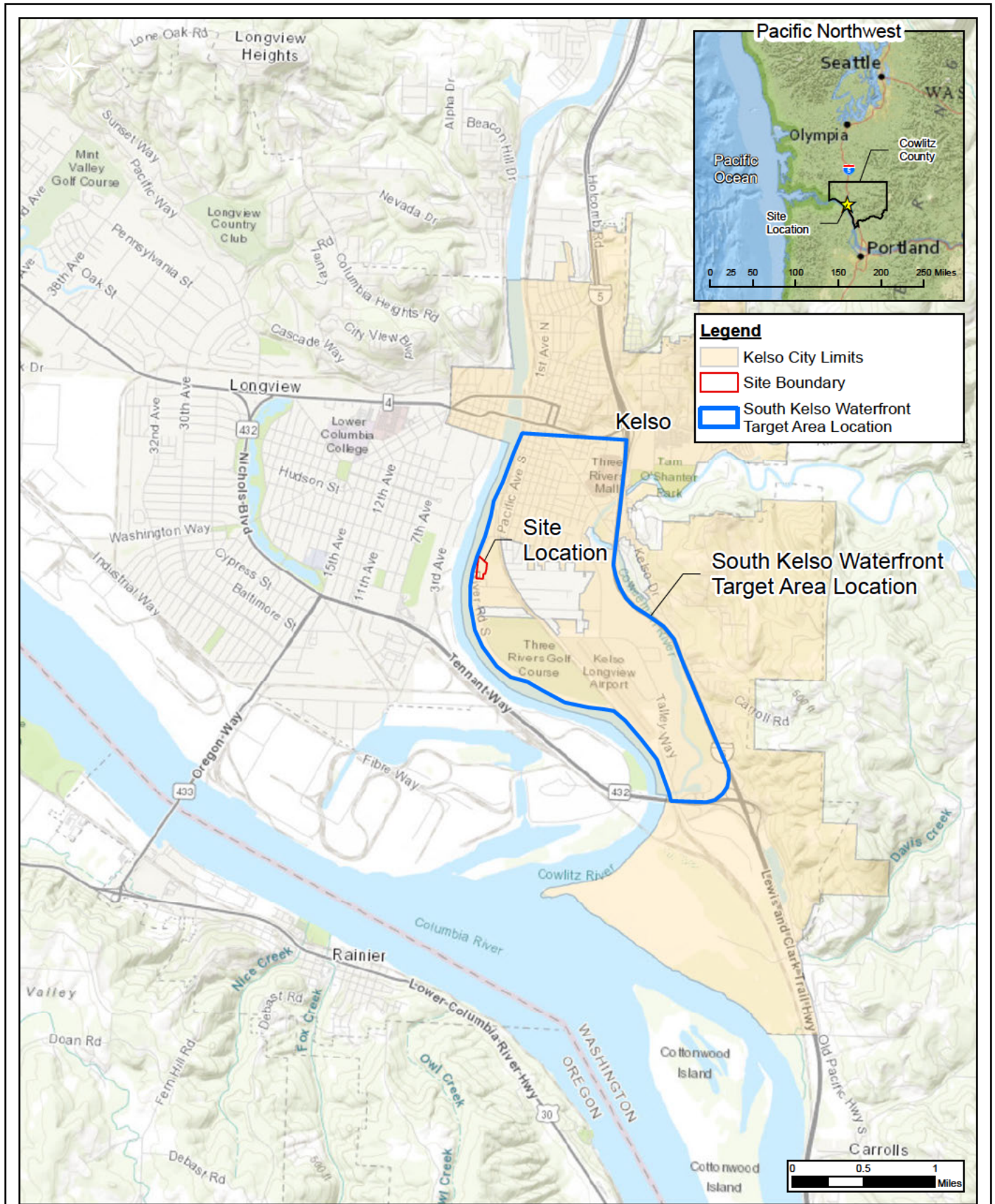
Kelso holds a story of struggle against competition in business and professions, its disasters and its faith in itself to overcome all odds and to expand, grow and progress in every way. We have the strategic foundation to put our redevelopment plan into action, a highly capable team, and a track record of leveraging successful projects. This Koppe Metals Site is a priority due to its visibility along the heavily traveled South River Road, location adjacent to the Cowlitz River, high community interest due to its industrial history, fully characterized environmental conditions, size, and defined redevelopment plans (affordable housing with a potential ground floor daycare, services center, and community space). We ask for your support to bring this vision to fruition!

Sincerely,

Andrew Hamilton
City Manager, Kelso

Attachments:

- Attachment A – Site Vicinity Map
- Attachment B – Grant Narrative
- Attachment C – Threshold Criteria Responses



Vicinity Map
Koppe Metals, Kelso, Washington

Attachment A

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

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

The rural City of Kelso (Kelso; pop. 12,691) is located in southwest Washington state, in Cowlitz County (pop. 111,900), across the Columbia River from Oregon. Kelso is situated at the confluence of the Columbia, Cowlitz, and Coweeman Rivers, approximately 48 miles north of Portland. Here the over 1/2 mile wide Columbia River, the lifeline of the Pacific Northwest, is joined and strengthened by its tributaries, creating a singular dynamic nexus and hub of ecology, commerce and culture throughout the area.

Early settlers in the 1840s were attracted to Kelso's rich river lands timber resources, an position on the Cowlitz Trail, a major travel route to Puget Sound. The Cowlitz Trail included the Columbia River stage, Cowlitz River stage, and an overland portage to New Market (now the city of Tumacac), from which the could boat throughout the Puget Sound. River barges initially transported timber, establishing an economic foundation that later diversified to handle crop, metal and other goods due to the winding amount of timber available. Today, the regional economy still relies on wood products, but the sawmill and related industries that once powered Kelso have largely disappeared. Their lasting impact however, is most prominent in Kelso's **Southern Kelso Water front (SKW; aka the Target Area (TA))**, a historically significant industrial and rail corridor along the eastern bank of the Cowlitz River, directly south of downtown Kelso. The SKW's past practices have left a collection of underutilized properties bearing the environmental legacy of contamination that hinders the economic revitalization of this strategic riverfront location (see site vicinity map). The history of filling the rivers and past industrial uses in the SKW makes cleanup and redevelopment of Kelso's brownfields economically challenging to this area suffering from the visible and economic scars of deindustrialization. Kelso's population makes up 11% of the County, yet it contains 18% (50 total) of the County's listed contaminated sites, and 22% of the County's undeveloped storage tanks (USTs). Of the 50 known sites in Kelso, almost half (22) are located within the SKW according to Washington Department of Ecology's (ECY) databases. Asbestos, lead paint, petroleum, pesticides, metals, PAHs, PCBs, and other chemical byproduct from the logging industry (e.g.,ioxin and urans) are widespread on brownfields in the TA and are negatively impacting the health of sensitive populations as will be discussed in Section 2.

The grant funds will enable Kelso to remediate and reuse its top priority brownfield site (the **Koppe Metals site** [Site] described below), resolve environmental inequities, foster new business and job opportunities, enhance environmental quality and resolve economic imbalances in the surrounding community. As far back as 1980, according to Kelso's first Comprehensive Plan, Kelso "has virtually no uncontained [i.e., without construction limitations], vacant and highly suitable for development."

Redeveloping brownfields is of the utmost importance, not only to address the legacy of environmentally impaired properties and improve health conditions, but also to spur in-fill redevelopment that builds off existing infrastructure, catalyzes future investments and supports economic resilience. Greenfield development is infeasible given Kelso's bounded nature between rivers, adjacent cities, and the foothills of the Cascade Mountains.

1.b. Description of the Proposed Brownfield Site

The Site, located at 1610 South River Road in the KW, is a former scrap metals salvage yard that operated from 1945 to 2007. In the 1990s, the Site was processed in approximately 50 tons of scrap metal per month. At 4.2 acres, the Site is currently vacant and adjoins the Cowlitz River to the east and existing homes to the north, south, and west. All buildings have been removed, except a small, 50 sq ft partially buried shed and a 10 sq ft well house. While the site is located in an officially-designated floodplain, it is protected by an approximately 15-foot-high levee constructed in the mid-1950s and with additional infrastructure elements in the 1980s that were overseen by the US Army Corps of Engineers. The levee, topped by the heavily traveled, two-lane, paved South River Road, has earned the site a FEMA Flood Hazard Zone X designation, which, significantly reduces development concerns.

Various site assessments occurred as early as 1988, with additional data collected in 1990, 1998, 1999, 2019, and culminating with a full Remedial Investigation in 2025 (funded by Kelso's FY23 Brownfields Assessment Grant). Soil is contaminated with arsenic, lead, mercury, total carcinogenic polynuclear aromatic hydrocarbons (cPAHs), total polychlorinated biphenyls (PCBs), and diesel plus heavy oil (TPH-D + TPH-HO) exceeding the ECY's Unrestricted Soil Direct Contact Screening Levels. Groundwater contains TPH-D + TPH-HO at one location greater than Groundwater as Drinking Water Screening Levels. Soil contamination is spread throughout the entirety of surface and near surface soil, with several hot spots, but dissipates quickly with depth (six foot maximum). The most severe contamination is in the north-central portion of the Site. Groundwater contamination is minimal. The cost to remediate soil prior to development, with costs between \$2 million and \$8 million (see ABCA), has prevented reuse of the Site.

This Site is a priority due to its visibility along the heavily traveled South River Road, high community interest due to its industrial history, fully characterized environmental conditions, size, and defined redevelopment plans (affordable housing with a potential ground floor daycare, services center, and community space). Redevelopment of the Site will provide a number of benefits to the public and environment, including reduction of contamination, a potential daycare, community gathering space, and attainable housing for underserved populations such as veterans - at 11%, Kelso has almost double the rate of veterans in WA (7%) and the US(6%) per 2023 ACS. The Site was listed as a priority Site in Kelso's FY23 Brownfield Assessment grant. The Site is ready for its long-awaited cleanup and future reuse.

Revitalization of the Target Area

1.c Reuse Strategy and Alignment with Revitalization Plans

In 2017, Kelso's [Comprehensive Plan](#) was updated to address the challenges Kelso faces today. The Vision Statement that is the basis for this Comprehensive Plan was articulated through a series of community workshops. Kelso is pursuing strategies to strengthen the local economy, promote sustainability, and find efficient means to maintain desired levels of public services. The Plan's goals include: 1) improve the vibrancy and stability of residential neighborhoods and mixed-use development with housing for diverse incomes, age groups, and lifestyles; 2) provide additional opportunities for multi-family housing in and near downtown; 3) protect and enhance the natural environment; and 4) address regional priorities, challenges, and redevelopment opportunities through partnerships with local, state, and federal agencies, local organizations, and the business community. The Plan specifically states objectives for South Kelso (which includes the SKW Target Area) of 1) designating areas suitable for single family and multi-family residential uses, 2) improving access and circulation, and 3) exploring the use of CDBG grant funds and other public funds to expand sewer service. All three of these objectives are in line with redevelopment of the Site.

The 2014 [South Kelso Revitalization Plan](#) ties more specifically to the SKW Target Area. Residents' ideas and solutions were at the heart of the Revitalization Plan. More than 500 people were reached, including 60 at an open house, 210 through survey responses, and 75 at "coffee talks." By directly participating in the process and approving the final set of recommendations, residents defined revitalization on their own terms. Although the Plan is 11 years old, it remains relevant. The community described the following concerns for south Kelso, which includes the SKW and the Site: 1) high transient population and rental turnover; 2) abandoned buildings and absentee landlords; 3) lack of parkland and a community center in the area; and 4) lack of proper infrastructure and upkeep of streets, roads, and buildings. The community supports revitalization efforts such as adding residences and scenic and natural areas in the Plan, and also focuses on attracting investment, increasing appeal and desirability of the community, creating spaces for community gatherings, improving housing, and helping to retain/attract workforce talent.

Reuse of the Site perfectly aligns with the goals of both guiding documents, and the reuse strategy is centered around the interest of a local nonprofit developer that focuses on unhoused populations. Affordable housing with a mixed-use service component (e.g., daycare, community space, service center) is planned. The Site is also adjacent to a planned paved multi-modal trail connecting the area to downtown; redevelopment will both improve access to the downtown and add to the recreational

opportunities in the vicinity. Kelso has been exploring working with a local developer who currently owns 10+ acres of adjacent property to the north. The Site is currently zoned for single family residential; Kelso will aid the future developer to make the necessary changes to the current zoning. This project would build off the momentum around a new 54-lot residential hub along the Cowlitz River, ¼ mile south of the Site. As stated previously, there are no known development restrictions related to its floodplain designation.

1.d. Outcomes and Benefits of Reuse Strategy

The proposed mixed-use affordable housing development with a mix of incomes (60/80/120% AMI) will stimulate the economy by providing temporary construction jobs as well as permanent jobs. The ground floor with anticipated neighborhood services (e.g., daycare/service center) supporting residents and the wider community, will also help to cover the building’s maintenance costs.

The planned paved multi-modal path adjacent to the Site and Cowlitz River will improve pedestrian and bike access between the downtown area, south Kelso, and green areas along the SKW. This is especially important since 14% of households in SKW do not have a vehicle (USDA Food Access Research Atlas, 2022). Underserved populations will be served, as all people in poverty-stricken south Kelso will have better access to jobs, fresh food, and local goods, simply by increasing access to downtown.

Creating affordable housing options would help ease the problems of poverty, high rents, and homelessness, details of which are discussed in Section 2a/b. The livability and economic benefits of brownfield redevelopment in south Kelso are numerous. It will spur economic development, create jobs, increase property values, and promote walking and biking. Kelso is currently working on another transformative new development that will bring vital community services and affordable housing and is a proof of concept. The project includes a 7,000 sq ft public library, a 3,000 sq ft community center, and 40 units of affordable housing (half reserved for currently homeless individuals) built above both facilities. Vulnerable groups (seniors, poor, homeless) would have the opportunity to move into the proposed affordable housing development on the Site and would then have access to services and amenities that shelter them from flooding, heat, and poor air quality, all of which are expected to be exacerbated by extreme weather events.

Lastly, as the Site owner, Kelso will require incorporating green building practices such as the use of bioswales, solar panels, and the pursuit of LEED certifications. Kelso follows the statewide Washington State Energy Code, which includes specific provisions for renewable energy generation and solar readiness in new construction. The code aims to incrementally reduce energy consumption and move towards zero fossil-fuel greenhouse gas emissions in new buildings by 2031. Solar panels would provide renewable energy and limit non-renewable energy cost and use for the new residences, thereby saving money every month on utility bills and increasing disposal income for residents.

Strategy for Leveraging Resources

1.e. Resources Needed for Site Characterization

Kelso’s FY23 Assessment Grant has over \$140,000 in funding remaining if further characterization is required. Additionally, ECY has both Targeted Brownfield Assessment funds as well as its recently awarded \$2MM FY25 EPA State Assessment Grant in the unlikely event additional funding is needed for site characterization. Kelso has closely worked with ECY through the characterization process and continues to have its full support. Given the abundance of readily available resources, there is zero concern for additional funding should supplemental characterization be required after cleanup grant award.

1.f. Resources Needed for Site Remediation

The funding requested in this application will fully address the remediation of the Site, as outlined in the completed ABCA. No additional funding for remediation is needed to enable Site reuse if the FY26 cleanup grant is awarded. In the off chance something changes, ECY’s Affordable Housing Cleanup Grants are designed for Sites such as this.

1.g. Resources Needed for Site Reuse

Once the Site is reuse-ready (post-remediation), vertical construction grants and incentives through Community Development Block Grants and tax increment financing can be used. The Site’s census tract

also has a federal Opportunity Zone designation, which Kelso will use to incentivize redevelopment and the associated tax breaks. Kelso can also apply for WA Dept. of Commerce grants and loans through their Revolving Loan Fund. Kelso has a successful track record of obtaining state/EPA cleanup grants and leveraging reuse funding. Kelso previously leveraged a FY13 EPA cleanup grant and a state cleanup grant to remediate an auto salvage yard into five ADA-compliant multi-family veteran housing units. Securing a cleanup grant is not only the logical next step but also the key to the redevelopment momentum Kelso currently has for the Site. Kelso will leverage Low-Income Housing Tax Credits as well during future reuse.

1.h. Use of Existing Infrastructure

The Site is an infill property connected to existing roads and infrastructure. Electrical and communication lines are available along South River Road and can be extended onto the Site. On-site utility upgrades would be paid for by the developer, who will already be required to bring nearby sanitary and storm sewers infrastructure onto the Site. All utility upgrades involving subsurface work would be completed under the guidance of a soil management plan. Cleanup/reuse planning funds from the existing FY23 assessment grant may be used to complete infrastructure and utility surveys to determine the capacity of existing utilities at the Site. A drinking water well tapped into the underlying Mint Farm Aquifer, not shallow groundwater, is an efficient way to bring water to the Site. Use of existing infrastructure results in savings to our local government budget.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

2.a. The Community's Need for Funding

For a city of only 12,000, remediation of the Site is not feasible given the already stretched financial and public safety resources of Kelso. Economically, Kelso's population growth is stagnant, and it has not captured as much business growth as neighboring areas. There is a not a downturn, but rather the absence of growth for decades; therefore, Kelso cannot rely on development/impact fees to fund projects and can't grow their way out of poverty. Kelso's population has slightly decreased since 2020 (12,720 to 12,697; 2023 ACS). Cowlitz County grew by 5% over the same period, and neighboring Clark County grew by 7% (US Census data). No significant increases in population are forecast for the future; the 2042 population projection is only 400 residents higher than in 2020 (Johnson Economics 2022 Study).

Washington does not have a state income tax; local government revenue comes from sales, business & occupancy, and utility taxes, so a healthy economy is key for the success of the community. Utilities are rate-driven with no profit. Since the early 1980s, the manufacturing sector has been in decline and since 2007, the retail/leisure sector has declined ~10% in Kelso (Johnson Economics 2022 Study). The Cowlitz County unemployment rate is 5.3%, compared to the US rate of 4.4% (esd.wa.gov, August 2025).

These factors have negatively affected City revenue sources. Sales, business and occupation taxes for 2026 are projected to come in at 89% of the 2023 actuals. High poverty rates (see Section 2b) impact sales tax revenue as low-income populations do not spend money. Kelso's final budget for 2026 is 10% less than 2025 (\$6 million lower), even with cost-of-living and insurance rate increases for city employees, which have taken a large bite out of the budget. Capital projects are allocated only 0.3% of the 2026 budget. Forecasts call for a decline in brick-and-mortar retail demand equivalent to 74,000 square feet of retail space and 6.8 acres of retail land over the coming 20 years in Kelso (Johnson Economics 2022).

Kelso has an assessment grant as well as access to other assessment grants, but cleanup funding is entirely separate. Kelso doesn't have access to cleanup funding sources, except for the WA Department of Commerce's Revolving Loan Funds. However, the amount of this cleanup far exceeds the limit that Commerce allows or even has to give to one site. The inability to secure other sources of funding relates to the small population and low-income nature of Kelso. This EPA grant funding will help to bridge Kelso's funding gap. The stigma associated with the Site threatens the vitality of the neighborhoods surrounding it, lowering property values and exacerbating environmental problems. Prospective purchasers/developers have ignored the prime real estate offered by the Site on several occasions because of the contamination, instead choosing to develop greenfields outside of the area, even though the Site is more centrally located.

Redevelopment of the Site will provide impoverished residents with much-needed affordable housing and employment opportunities, create recreational areas, and increase the property and income tax bases.

2.b. Health or Welfare of Sensitive Populations

The SKW and Kelso as a whole have a disproportionately high number of sensitive populations.

- 27% of SKW households and 30% of children live below the poverty line, more than double the state and national rates.
- Citywide, 10% of Kelso’s population does not have health insurance (1.5x the rate for the county and state) and 24% of residents have a disability, almost double the rate for the state and nation (ACS2023).
- A lack of affordable housing has resulted in 46% renter-occupied households, compared with less than 36% rented in the state and nation (ACS 2023). Of those renting, 50% are cost-burdened (spend >30% of income on rent) (US Census 2020) and 39% spend more than 50% of income on rent (Longview-Kelso Consolidated Plan). Even more significant, 64% of Kelso low-income renters and 50% of low-income owners are cost-burdened (>30% of income spent on housing). Those renters in the greatest level of poverty are hardest hit by cost burden: 70% of renters in the lowest income group pay more than half of their income on housing-related costs (Longview-Kelso Consolidated Plan). The percentage of renters is likely higher in reality, being masked by multigenerational families living in a single home.
- Since 2019, Kelso rents have increased 44%+ for a 2-bd apt (\$900 to \$1,600/month; apartments.com).
- The countywide unsheltered homeless population has doubled since 2022 from 71 to 145 (Cowlitz County 2025). As of the start of the 2021-2022 school year, 550 students in Cowlitz County identified as homeless, according to the Office of Superintendent of Public Instruction data (Longview Daily News, Aug 5, 2022); target area specific homeless statistics are unavailable.
- Homeless activity on the Site has occurred intermittently, with transients sleeping mostly on the SE corner of the Site. Surface soil contamination is present in that portion of the Site. Redevelopment of the Site presents an opportunity to eliminate exposure to contamination, expanding affordable housing, and providing jobs during redevelopment.

Demographics (All ACS 2023; unemployment: esd.wa.gov)	SKW Target Area	City of Kelso	Cowlitz County	WA state
Total population	6,102	12,697	112,864	7,812,880
Median household income	41,796	59,462	72,932	94,605
Poverty rate	27%	19%	13%	10%
Child poverty rate	30%	25%	17%	12%
Bachelor’s degree or higher	8%	12%	17%	41%
Housing units (% rentals)	46%	45%	34%	36%
Unemployment rate (2025)	NA	5.3%	5.3%	4.4%
Households receiving SNAP	37%	29%	19%	11%

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

Asthma rates in the SKW Target Area are in the 96th percentile compared to the overall state rates (10.5%). The national asthma rate is only 7.7% (CDC 2025). The proximity to the heavy traffic on the Interstate 5 corridor may be a contributor to these percentages. In Kelso, 25% of homes were built before the 1940s and the median construction year is 1961, compared to 1984 for WA state (ACS 2023). This old housing stock contains asbestos and lead paint, which negatively impact the welfare of residents if exposed. Lung cancer rates in Cowlitz County (61 per 100k people) are among the highest in the state (5th out of 37 counties) and are 18% higher than the statewide average (statecancerprofiles.gov). Cancer mortality rates overall are 30% higher in Cowlitz County (260/100k) compared to state (172/100k) and national (183/100k) averages (CDC 2023). Due to a lack of healthy food and recreation options nearby (i.e., USDA food desert), diabetes rates in Cowlitz County are 16% higher than the state and national average (CDC Diabetes map). The CDC’s social vulnerability index (SVI) ranks Cowlitz County in the lowest 22% of counties nationally.

This grant will provide funds to clean up and kickstart redevelopment at a known brownfield site, which will contribute to overall revitalization goals and provide land uses that will serve the low-income population. Construction of additional housing options is a necessity in a city with as limited options as Kelso. Additionally, the planned multi-modal trail will encourage and support area residents with access to

downtown amenities and services, an additional recreation opportunity, and access to fresh and healthy foods, all of which will help to increase the quality of life for community members.

2.d. Economically Impoverished/Disproportionately Impacted Populations

As mentioned in subsection 2a/b, far too many children in the SKW live below the poverty line, and homelessness is increasing for both children and the adults they rely on. The SKW meets the USDA food desert subcategory of low-vehicle access, distance of >1/2 mile to a supermarket, and poverty rates >20%. From 2015 to 2019, the number of households in the SKW more than 1/2 mile from a supermarket and without vehicles more than doubled, from 3.9 to 8.7%. Kelso also faces tremendous challenges due to increased wildfire frequencies. Hotter and drier summers have disproportionate impacts on the SKW, which is more vulnerable due to poor and aging housing stock (less than 30% of homes statewide have central AC, the lowest in the country [2021 American Housing Survey]), deficient infrastructure, and lack of transportation access (only one bus line [River Cities Transit Route 57] to a small portion of the SKW). The wildfires contribute to a decrease in air quality for long periods of time in Kelso. Better housing options (e.g., redevelopment of the Site) with modern air filtration systems will help alleviate this issue.

Historically, there has been little help for the homeless, veterans, and other economically impoverished individuals in the SKW (statistics provided above). Affluent areas are outside the SKW, but the poor have to live among the contamination. Cleaning up the Site will reduce the contamination to which disproportionately impacted populations are exposed. Removing hazards associated with brownfields will result in a reduction of contaminants, improvement of aquatic life in the Cowlitz River, and allow for additional recreational opportunities for all area residents, not just those who can afford it.

Community Engagement

2.e. Project Involvement / 2.f. Project Roles

Kelso staff, specifically Will Hoskins, PE (Senior Engineer) and Andrew Hamilton (City Manager) will contribute their brownfields expertise and success in engaging the community to ensure public involvement in each stage of the cleanup process. Mr. Hoskins, with support from other City staff, will lead community engagement efforts and develop an overall communications and engagement plan that can guide the partners. Local community partners ensure the grant outcomes are in line with the community’s goals. The chart below summarizes the community engagement process for the cleanup.

Partner Name	Contact & Title	Specific Role in Project
Community Frameworks Housing Developer	Adam Lee, Developer (360) 842-8051	Assist with design and feasibility of future low-income housing on Site, and share expertise on similar projects.
Lower Columbia Community Action Program (CAP)	Kathy Bates, HR Director (360) 425-3430	Provide insights and expertise on specific reuse design and plans for housing project. Prior partnership with Kelso on successful affordable housing project utilizing Kelso’s FY13 EPA Cleanup Grant.
Love Overwhelming	Chuck Hendrickson, Exec. Director (360) 846-0272	Assist with the redevelopment after cleanup. Nonprofit champion of affordable housing. Assist with public engagement, reuse/visioning at meetings and via website/social media. Identify applicable future tenants for new development.
The Cowlitz Indian Tribe	Dan Meyer, Commissioner (360) 353-9200	Provide consultation on potential cultural resources on the Site that may be unearthed during remediation.
Rotary Club of Kelso	Josh Carter, President (360) 425-1482	Provide insight on economic and local business impacts of brownfields; Enlist business members and developers in support of the project; Assist distribution of project information, and grant funds awareness outreach; Bring together community health/social service agencies in support of the brownfield reuse.
Kelso Business & Community Association	Lindsey Cope, President (360) 423-9921	
Cowlitz Community Network	Michael O’Neill, Dir. (360) 442-7089	
ECY	Ali Furmall, Brownfield Specialist (509) 655-0538	Provide technical assistance for cleanup planning and remediation activities, as applicable.
Family Promise of Cowlitz County	Vonda McFadden, President (360) 703-3131	Work with existing local resources to help families in crisis with housing and ensure that they remain independent afterward; Provide grant awareness outreach.

Kelso Public Library	Natalee Corbett, Library Manager (360) 423-8110	Host community meetings and provide meeting space; Post news of grant award and documents.
South Kelso Neighborhood Association	Star Garcia, Chairperson [REDACTED]	Host community forums and assist with marketing, communication, outreach to residents and businesses in the community.
Cowlitz County Health & Human Services	Carole Harrison, Director (360) 414-5599	Provide health/hazard data; collect air data; assist with public engagement through social media; educate the community on brownfield site hazards to the public and the environment.

The current mixed-use development discussed in Section 1d is the result of a strong partnership between Kelso, Community Frameworks, Lower Columbia CAP, and several other local organizations and reflects 50 years of experience working together. Kelso is contributing the land for that project, while Community Frameworks is leading development and financing efforts.

2.g. Incorporating Community Input

The community is very familiar with the Site as Kelso kept nearby residents, stakeholders and partners apprised during the assessment work over the past two years, including a September 2025 meeting where over 30 attendees provided valuable input on the ABCA and reuse plan. Recently, at a January 6, 2026 community meeting, Kelso listened to and addressed many comments (see Threshold Criteria) provided by over 60 residents. Comments were largely related to discussions on low-income housing; the community was overwhelmingly in support of the cleanup and future redevelopment of the Site. To continue transparency and keep residents informed of the progress of cleanup efforts, Kelso will: 1) hold at least three (3) public meetings at key milestones (grant award, cleanup start and completion) plus annual updates; 2) offer input opportunities at local organization meetings(including meetings of the neighborhood organizations); 3) share fact sheets, press releases, and website updates; 4) post recorded meetings/presentations online; and 5) display on-site signage explaining project details and noting EPA Brownfields Grant Funding.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The proposed cleanup, as outline in the ABCA, would include: 1) excavation and off-site disposal of all soil on the Site with concentrations greater than 10x the Unrestricted Soil Direct Contact Screening Level for Total PCBs, which is the TSCA threshold requirement for high density land use (e.g., multifamily residential); 2) backfilling of excavations with clean imported soil to match the existing grade; 3) installation of a 12-inch cap/cover to protect future users; 4) quarterly groundwater monitoring for one year of constituent concentrations to confirm successful remediation; and 5) implementation of institutional controls with land use restrictions (e.g., no digging beneath the cap and no drinking on-site shallow groundwater). Annual inspections of the cap/cover integrity will be required. Excavated soil would be disposed of at a facility approved to handle the waste. Confirmation soil sampling would be conducted to ensure that cleanup objectives are achieved prior to backfilling and grading with clean off-site soil. This alternative would result in the removal of approximately 1,665 cubic yards of contaminated soil, and the importing of approximately 8,840 cubic yards of soil for backfilling excavations and placement of a 12-inch soil cover. This cleanup would be protective of potential future receptors and would require the lowest cost to implement of the alternatives listed in the ABCA, consequently resulting in the highest relative benefit/cost ratio among the feasible alternatives. The ABCA was shared with the community at a public meeting in September 2025 and was well received, with no negative comments received.

3.b-e. Description of Project Implementation, Schedule, Task/Activity Lead, and Outputs

Costs were derived from Kelso staff and experienced and qualified environmental professionals (QEP).

Task 1 – Grant Management (\$30,400)	c. Lead: Kelso with support from QEP
b. Implementation: 1) Cooperative Agreement (CA) oversight; 2) develop grant work plan; 3) competitively procure (pursuant to 2 CFR §§ 200.318 through 200.327) and oversee QEP and the cleanup contractor; 4) quarterly progress reports and annual federal financial report (FFR) reporting; 5) entries in the Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; 6) Grant Closeout Report with accomplishments, expenditures, outcomes, outputs, lessons learned and resources leveraged; and 7) City participation in brownfield conferences prior to/during cleanup activities.	

d. <u>Project Schedule</u> : Award anticipated in 10/26; begin competitive procurement process by first quarter 2027 and retain QEP and cleanup contractor by spring 2027. Attend brownfield conferences as available and feasible (anticipated EPA national conference in 2027). Monthly drawdowns once cleanup activities commence, quarterly progress reports via ACRES, annual FFR reports, a final report at the end of or termination of the CA, ACRES updates as applicable and any other required EPA reporting will be completed as directed. Anticipated project completion: 4/29.	
e. <u>Outputs</u> : 1 work plan; 15 quarterly reports; 1 Grant Closeout Report; 3 annual/1 final FFRs; ACRES updates (ongoing); 1 City staff to attend up to 2 state/national brownfields conferences.	
Task 2 – Community Outreach (\$18,000)	c. <u>Lead</u> : Kelso, support from QEP/ Community Groups
b. <u>Implementation</u> : Outreach will include: 1) 3+ milestone community meetings (grant award, construction kick-off, construction completion) and annual meetings; 2) create outreach materials including signage at the Site, PPT presentations, recorded speakers, flyers, social media; 3) dedicated webpage to project updates, and 4) solicitation and responses to community input.	
d. <u>Project Schedule</u> : Public meetings held after grant award (~12/26), when cleanup plan is final (~6/27), and after cleanup is complete (~12/27) plus annually; outreach materials made available before cleanup (~6/27); input gathered at community events and when provided directly to City via email, Facebook post, etc.	
e. <u>Outputs</u> : 6+ community meetings held and notes/presentation materials developed; 2-3 project fact sheets/signs; regular updates on City’s websites/social media; recorded presentations.	
Task 3 – Cleanup Planning (\$73,000)	c. <u>Lead</u> : QEP with Kelso oversight
b. <u>Implementation</u> : Activities include finalizing ABCA with review and approval from ECY/EPA, engineering designs for cap, evaluation for cultural and historical preservation (NHPA/ESA)/inadvertent discovery plan (IDP), preparing Quality Assurance Project Plan (QAPP) for confirmation sampling, Health and Safety Plan (HASP), negotiating and receiving necessary regulatory approval, and preparing bid documents for solicitation of cleanup contractor.	
d. <u>Project Schedule</u> : Final ABCA anticipated in 1/27. Engineering drawings, cultural resources/NHPA/ESA review, QAPP, and bid documents completed ~6/27.	
e. <u>Outputs</u> : 1 ABCA, 1 QAPP, 1 HASP, 1 IDP, 1 set of bid documents including engineering drawings.	
Task 4 – Cleanup (\$2,629,500)	c. <u>Lead</u> : Cleanup contractor with QEP oversight
b. <u>Implementation</u> : Majority of grant funds used for cleanup activities. Kelso will procure a cleanup contractor and Site cleanup activities will be completed as described in Section 3a and the ABCA. Kelso and QEP will work with ECY/EPA to ensure cleanup meets ECY standards. QEP will perform oversight of cleanup contractor and confirmation sampling during cleanup activities to ensure cleanup completed in accordance with cleanup plan. QEP will perform quarterly groundwater monitoring (GWM) for four quarters to monitor groundwater conditions during and after cleanup. City/QEP will file deed restrictions with institutional controls and complete final reporting for submission/approval by ECY/EPA.	
d. <u>Project Schedule</u> : Cleanup will occur 10/27 – 12/27 (projected). Final cleanup reporting/deed restriction by 4/28 (projected). Final quarterly GWM report by 4/29 (projected).	
e. <u>Outputs</u> : 1 final cleanup report, 1 deed restriction with ICs, 4 quarterly GWM reports, 1 No Further Action letter	

3.f. Cost Estimates

Costs were derived from Kelso staff and environmental professionals with cleanup experience. Hourly rates are anticipated billing rates based on 2025 rate schedules.

Budget Categories	City of Kelso Koppe Metals Site - FY2026 Cleanup Grant Budget (No indirect admin costs)				
(all direct costs)	Grant Management	Community Outreach	Cleanup Planning	Cleanup	Total Budget
Personnel	\$15,000	\$10,000	\$8,000		\$33,000
Fringe Benefits					
Travel	\$4,600				\$4,600
Equipment					\$0
Contractual	\$10,000	\$8,000	\$55,000		\$73,000
Construction				\$2,614,500	\$2,614,500
Other (Conference Fee)	\$800				\$800
Other (State Oversight)			\$5,000	\$15,000	\$20,000
Total Direct Costs	\$30,400	\$18,000	\$68,000	\$2,629,500	\$2,745,900

No indirect administration costs will be charged to the grant.

Task 1: Grant Management (\$30,400)

Personnel costs: \$15,000 (150 hrs at \$100/hr) for reporting, procurement and overall coordination of CA with EPA Project Manager. *Additional personnel costs will be provided in-kind.*

Travel: \$4,600 for one staff to attend 2 national/state brownfield conferences (each conference: airfare [\$1,000], 4 nights hotel [\$200/night, \$800 total], 5 days per diem [\$100/day, \$500 total], \$2,300 total x 2 conferences).

Contractual: \$10,000 (50 hrs @ \$200/hr) for grant reporting and coordination.

Conference fees: \$800 (conference fees for 1 person for 2 conferences).

Task 2 Community Outreach (\$18,000)

Personnel costs: \$10,000 (100 hrs at \$100/hr) for community meetings, public outreach, development of materials/preparation, Site visits with developers/stakeholders, meetings. *Additional personnel costs will be provided in-kind (e.g., hours spent and costs for printing materials for meetings).*

Contractual costs: \$8,000 (40 hrs @ \$200/hr) for time spent conducting community outreach and stakeholder meetings and preparing handouts/flyers.

Task 3 – Cleanup Planning (\$73,000)

Personnel Costs: \$8,000 (80 hrs at \$100/hr) for professional services to prepare comprehensive bid documents and solicitation for cleanup activities, evaluate contractor submissions, verify references and credentials, coordinate pre-bid onsite meeting and facilitate contractor selection.

Contractual Costs: \$55,000 (100 hrs at \$200/hr, 250 hrs at \$140/hr) to finalize ABCA incorporating comments from public notice, and produce Engineering Designs, Bid Specs, QAPP, HASP, and IDP.

Other (ECY): \$5,000 (50 hrs at 100/hr) for review and approval of cleanup planning documents once the Site is entered into the Voluntary Cleanup Program.

Task 4 – Site Cleanup (\$2,629,500)

Cleanup Contractor Costs: \$2.61MM for Site cleanup. *See attached ABCA for cleanup cost estimates.* Cost estimates are based on 2025 ABCA of \$2.075MM with an annual 10% escalation clause for increased construction costs/inflation (2027 start date) plus 5% contingency. General categories within \$2.075MM cleanup include mob/demob (\$30k), submittals (\$30k), site prep (\$60k), excavate/dispose of soil (\$350k), confirmation sampling (\$40k), geotextile placement (\$200k), obtain/place cap (\$770k), GWM (\$80k), construction management (\$290k), field and reporting (\$100k), tax (\$125k). Plus, escalation clause for two-year delayed start (\$2.075MM x 10%/yr x 2 = \$415k), and 5% contingency (\$125k) = \$2,614,500.

Other (ECY): \$15,000 (150 hrs at 100/hr) for review and approval of cleanup planning documents.

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

The project will deliver measurable environmental and community benefits. Progress will be tracked through regular coordination meetings between City staff, ECY/EPA, and the QEP, ensuring milestones are met and emergent issues addressed promptly during active cleanup. Kelso will monitor the project budget monthly and document outputs in quarterly reports submitted through EPA’s ACRES database. Key short- and long-term performance indicators will include: 1) acres prepared for reuse; 2) volume of hazardous materials removed; 3) number of units and type of community amenities created; 4) number of construction jobs and permanent jobs created; and 5) increase in nearby property values. Additional metrics will capture community engagement and economic impact, such as meeting attendance, feedback received, funding leveraged, and jobs created.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

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

Kelso will use a combination of its internal team structure and contracted QEP to complete all eligible Cleanup Grant tasks within the period of performance. Kelso has sufficient capacity and previous experience for all technical/administrative tasks associated with successfully managing EPA Brownfield Grants, as detailed below. City staff also has extensive experience identifying/resolving land ownership, liability, zoning, permitting, and entitlement issues, which will be beneficial in early identification of roadblocks throughout inventory, prioritization, and site selection portion of the project.

The project will be managed by **Andrew Hamilton, Kelso City Manager** (the Project Director). Mr. Hamilton has worked for Kelso for over 38 years. He oversees the current FY23 EPA Assessment Grant. Mr. Hamilton will oversee the competitive procurement of a QEP to supplement Kelso's expertise and capacity. He will manage all work completed by the project team and has the expertise, qualifications, and experience that will result in successful administration of the grant. He has attended national brownfields conferences.

Will Hoskins, Senior Engineer, will support Mr. Hamilton, and manage day to day operations of the grant, if awarded. Mr. Hoskins currently leads day to day operations of the FY23 EPA Assessment grant. He is a Registered Professional Engineer and has 20 years' experience in environmental and civil engineering for both public (state and local) and private entities. He will support Mr. Hamilton by attending meetings, reviewing quarterly progress reports and providing necessary approvals of contracts and deliverables. His responsibilities will also include budget tracking, documentation, reporting, and drawdowns. Messrs. Hamilton and Hoskins have both directly overseen millions of dollars in capital improvement projects, including environmental remediation projects, and have a combined 50+ years of local institutional knowledge and relationships with the community. The key staff will lead other City staff, the QEP, and contractors to ensure successful project implementation and timely completion of the required reporting, ACRES database updates, and financial documents.

Jessica Henderson, Project Compliance/Contract Specialist, will handle contracting, reimbursement entries, and financial tasks. She currently tracks and manages all City grant contracts and has been with the City for 3 years.

4.c. Acquiring Additional Resources

Kelso will conduct a fair and transparent procurement process to select a QEP and a cleanup contractor with proven experience on EPA Brownfields projects. All procurements will comply with all applicable federal, state and local regulations including 2 CFR 200 and 1500 as well as 40 CFR 33. Kelso maintains robust internal policies for competitive bidding and has a strong track record of successfully managing contractor selection for complex projects. In addition, Kelso has established procedures to ensure continuity of operations, including the ability to recruit and onboard qualified staff if vacancies occur during the grant term.

Past Performance and Accomplishments

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

4.d.1. Accomplishments: Kelso previously received a FY13 EPA Cleanup Grant of \$156k to remediate an auto salvage yard, following a \$300k ECY grant that funded site assessment and redevelopment planning. Historical salvage operations had left widespread shallow soil contamination from PAHs, PCBs, benzene, and metals. Kelso is also the current recipient of a FY23 EPA Assessment Grant of \$500k, which has supported full characterization of the Koppe Metals Site, an assessment of an additional property, and initial steps towards development of a city-wide inventory.

Outputs and Outcomes:

- FY13 Cleanup Grant: QEP procurement, community meeting, cleanup plan, remediation of one acre of contamination, and compliance reporting. The site was successfully redeveloped into five ADA-compliant multi-family housing units for veterans—all currently occupied—creating a strong sense of community.
- FY23 Assessment Grant (to date): QEP procurement, QAPP, three community meetings, one Phase I ESA, two SAPs, one Phase II ESA, one HMA, and one ABCA completed. Two sites, including Koppe Metals, are now ready for cleanup and reuse.

4.d.2. Compliance with Grant Requirements: Kelso has consistently met all EPA Brownfields grant requirements. It successfully managed funds, adhered to work plans, tracked finances, and submitted all technical documents and progress reports—including quarterly updates, ACRES entries, and final reports—on time. No compliance issues or adverse findings occurred. The FY13 Cleanup Grant was fully expended within the grant term, and the current FY23 Assessment Grant is on track to meet its deadline (10/1/23–9/30/27), with over 62% of funds already spent. These accomplishments demonstrate Kelso's strong procedural capacity to manage, disburse, and track future grants effectively.

Attachment C: FY2026 EPA Cleanup Grant Threshold Eligibility Responses

Koppe Metals Site

City of Kelso, Washington

1. Eligibility to Apply

The City of Kelso is a General-Purpose Unit of Local Government as defined under 2 CFR § 200.1 and is therefore eligible for funding.

2. Previously Awarded Cleanup Grants

The Koppe Metals Site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The Applicant does not have an open Multipurpose Grant.

4. Site Ownership

Kelso is the sole owner of the Property, conveyed by quick claim deed on January 14, 2026.

5. Site Information

- a. Koppe Metals Site
- b. 1610 South River Road, Kelso, Washington 98626

6. Status and History of Contamination at the Site

- a. Commingled but primarily hazardous substances
- b. Former scrap metal facility. Currently vacant.
- c. Soil contaminated with arsenic, lead, mercury, total carcinogenic polynuclear aromatic hydrocarbons [cPAHs], total polychlorinated biphenyls [PCBs], and diesel plus heavy oil [TPH-D + TPH-HO]) exceeding MTCA Unrestricted Soil Direct Contact Screening Levels. Groundwater contains TPH-D + TPH-HO at one location greater than Groundwater as Drinking Water Screening Levels.
- d. Contamination as a result of scrap metal operations, spread throughout shallow soil on majority of Property; several hot spots

7. Brownfield Site Definition

The former Koppe Metals site meets the definition of a brownfield site in that the site's "expansion, redevelopment, or reuse . . . may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant."

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

8. Environmental Assessment Required for Cleanup Grant Applications

A Phase II environmental site assessment report (or equivalent [Remedial Investigation Report]) was completed in July 2025. Other historic environmental assessments include: 1988 Site Assessment, 1990 Site Inspection, 1998 Groundwater Assessment, 1999 Groundwater Assessment, and 2019 Phase II Targeted Brownfield Assessment.

9. Site Characterization Complete

- b. Kelso is proposing that the Site be enrolled in the Voluntary Cleanup Program (VCP).
 - i. A letter from Ecology documenting sufficient Site characterization is attached as Threshold Criteria Response Attachment C-1. The letter documents that:
 - a. The Site will request State oversight through the VCP.
 - b. The Site is eligible to be enrolled in the VCP.
 - c. There is a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin.

10. Enforcement or Other Actions

Kelso affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the Koppe Metals Site, the Site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

A property-specific determination is not required. The Site does not fall within any types of properties property-specific determination, per EPA guideline document “Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k).”

12. Threshold Criteria Related to CERCLA/Petroleum Liability

- a. Property Ownership Eligibility – Hazardous Substance Site
- iii. Landowner Protections from CERCLA Liability
 - 1. Bona Fide Prospective Purchaser Liability Protection
 - a. The Site was acquired by the City of Kelso from Love Overwhelming Inc. on January 14, 2026 as a transfer/donation via a quick claim deed.
 - b. Kelso completed a Phase I Environmental Site Assessment using the ASTM E1527-21 in December 2025. The Phase I ESA was performed by an Environmental Professional (as defined in 40 CFR § 312.10) and the required declaration by the environmental professional is included in a written report. Kelso also performed remedial investigation activities to further confirm the extent of contamination at the Site. Threshold Criteria Item #8 above lists the dates of assessments completed on the Property. Previous assessments were completed on behalf of previous Site owners, to which Kelso has no connection.
 - c. Kelso is not liable in any way for contamination at the Site or affiliated with any other person potentially liable for the contamination. Kelso purchased Site after operations stopped and have not exacerbated the existing contamination. All disposal of hazardous substances at the site occurred before Kelso acquired the Site. Kelso hereby affirms that it has not caused or contributed to any release of hazardous substances at the Site, nor arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.
 - d. The Site has been vacant since being acquired by Kelso.
 - e. Kelso affirms that it is 1) assisting and cooperating with those performing the cleanup and providing access to the Site; 2) complying with all information requests and administrative subpoenas that have or may be issued in connection with the property (none to date); and 3) providing all legally required notices. No land use restrictions or institutional controls currently exist for the Site.

13. Cleanup Authority and Oversight Structure

The City of Kelso will use a combination of its internal team structure and contracted personnel to complete all Cleanup Grant tasks within the 4-year grant term. Andrew Hamilton will serve as Project Manager and Will Hoskins will serve as Assistant Project Manager. Kelso will work closely with the Washington Dept of Ecology to ensure regulatory compliance and sufficient community involvement. Ecology will also provide technical assistance as required. Kelso will procure an independent third-party oversight contractor to implement Property cleanup in accordance with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326. Access to neighboring properties will not be required because remedial actions will be performed wholly within Site boundaries.

14. Community Notification

Kelso provided public notice of its intent to apply for the FY2026 EPA Brownfields Cleanup Grant. The community was provided an opportunity to comment on the draft grant application, including the draft Analysis of Brownfield Cleanup Alternatives (ABCA).

- a. Draft ABCA – A draft ABCA summarizing information about the site and contamination issues, the cleanup alternatives considered (including a No Action alternative), and preferred remedial remedy. A copy of the draft ABCA is provided as Threshold Criteria Response Attachment C-2.

- b. Community Notification Ad – A public notice for the upcoming meeting was posted on December 30, 2025 on City of Kelso Facebook page, a regular mode of communication employed Kelso to its small population. The public notice contained the following information, per guidance from the EPA’s FAQ for the Cleanup Grant: “date, time, and place of a public meeting(s) and must indicate a draft of the application is available for comment.” The public notice and guiding documents (ABCA, draft grant application) were also posted in City Hall.
- c. Public Meeting – A public meeting was held on January 6, 2026. The meeting drew a total of 61 in-person attendees. Comments were collected from both Facebook and in-person, with responses given where possible during the meeting. An ABCA-specific public meeting was previously held at the Highlander Festival in September 2025 and had 30 attendees.
- d. Community Notification Documents are included as attachments to this Threshold Criteria response.

15. Contractors and Named Subrecipients

No contractors have yet been selected. There are no subrecipients for this grant.

Threshold Criteria Response Attachments:

- C-1 – Ecology Site Characterization Letter
- C-2 – Draft ABCA
- C-3 – Community Notification Ad
- C-4 – Summary of Meeting and Comments and Responses
- C-5 – Community Meeting Sign-in Sheet / Participant List



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

January 9, 2026

Andrew Hamilton, City Manager
City of Kelso
203 S. Pacific Ave
Kelso, WA 98626

RE: Ecology Support for the City of Kelso's Application for a Brownfields Cleanup Grant for Koppe Metals

Dear Andrew Hamilton:

The Washington Department of Ecology (Ecology) acknowledges that the City of Kelso (City) plans to conduct the cleanup of a brownfield site and is applying for an FY26 EPA Brownfields Cleanup Grant.

The City has developed an application requesting site-specific federal Brownfields Cleanup funding for the Koppe Metals site located at 1610 South River Rd in Kelso, Washington.

Ecology affirms that:

- i. The City of Kelso will request State oversight for the site through the Voluntary Cleanup Program or through an agreed order;
- ii. The site is eligible to be overseen by a State program; and
- iii. Based on the environmental assessments performed to date and information provided by the applicant, Ecology concurs that the site has a sufficient level of site characterization for the remediation work to begin.

For any questions regarding this letter, please contact me at (509) 655-0538 or ali.furmall@ecy.wa.gov.

Sincerely,

Ali Furmall
Brownfields Lead
Toxics Cleanup Program
Washington Department of Ecology

cc: Meredith Lightbody, EPA Region 10
Sarah Frederick, EPA Region 10
Marian Abbett, Ecology

