FY23 BROWNFIELD MULTIPURPOSE GRANT NARRATIVE INFORMATION SHEET

1. Applicant Identification:
   Confederated Tribes of Siletz Indians
   201 SE Swan Avenue Siletz, Oregon

2. Funding Requested:
   a. Grant Type: Multipurpose
   b. Requested Amount: $800,000

3. Location:
   a. Toledo, Oregon
   b. Lincoln County
   c. Oregon
   d. Tribal fee lands within the original reservation of the Confederated Tribes of Siletz Indians.

4. Target Area and Priority Site Information
   • The Target Area is the City of Toledo, Oregon – the location of the priority brownfield site.
   • The Target Area is located in Lincoln County Oregon - Census Tracts 9513 and 9514
   • The priority brownfield site is located at 2009 Sturdevant Road in Toledo, Oregon.

5. Contacts.
   a. Project Director
      Ann Lewis, Project Manager and STBC Chief Executive Officer
      541-994-2142
      alewis@stbcorp.net
      2120 NW 44th Street, Suite D Lincoln City, Oregon 97367

   b. Highest Ranking Elected Official
      Delores Pigsley, CTSI Tribal Chairwoman
      541-444-2532
      201 SE Swan Avenue, Siletz, Oregon 97380
   - The project is in Toledo, Oregon which has a population of 3,546.
   - The population of the Confederated Tribes of the Siletz Indians is 5,593.

7. Other Factors Checklist.

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>Target Area population is 3,546 and CTSTI's member population is 5,593. See Narrative Page 1 and Page 5.</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>The applicant, Confederated Tribes of Siletz Indians, is a federally recognized Indian Tribe. Narrative page 1.</td>
</tr>
<tr>
<td>The priority brownfield site(s) is impacted by mine-scoured land.</td>
<td>N/A</td>
</tr>
<tr>
<td>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).</td>
<td>The Site is bound by the Yaquina River. See and Narrative pages 1-2.</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>A portion of the site is located within a federally designated flood plain. See Narrative page 2.</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.</td>
<td>Narrative pages 3 and 4.</td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.</td>
<td>Only an estimated 10% of the overall project budget will be spent of reuse planning activities for the priority brownfield site within the Target Area. Reuse planning for the site has already been initiated. Narrative Page 2.</td>
</tr>
</tbody>
</table>

8. Letter from the State or Tribal Environmental Authority.

   Attached is a letter from the Oregon Department of Environmental Quality supporting the Tribe’s application for the 2023 EPA Multipurpose Grant at the Toledo Mill Property.
November 17, 2022

Terri Griffith  
U.S. Environmental Protection Agency,  
Region 10 1200 Sixth Avenue, Suite 155  
Mailstop: ECL-133  
Seattle, WA 98101  

RE: FY2023 EPA Multipurpose Grant Application for the Confederate Tribes of the Siletz Indians

Dear Terri Griffith,

The Oregon Department of Environmental Quality is pleased to acknowledge the Multipurpose Grant Application from the Confederate Tribes of the Siletz Indians (CTSI). CTSI is made up of 27 Western Oregon, Northern California, & Southern Washington Tribal bands. Those recognized Tribal bands include the peoples of the Clatsop, Chinook, Klickitat, Mollala, Kalapuya, Tillamook, Alsea, Siuslaw/Lower Umpqua, Coos, Coquille, Upper Umpqua, Tututni, Chetco, Tolowa, Takelma, Galice/Applegate & Shasta. CTSI is seeking funding to assess, cleanup and redevelop the former Toledo Mill site (ESCI 6465). It is important to CTSI to restore their ancestral lands, which includes the former Toledo Mill.

The former Toledo Mill Site is located on the Yaquina River in Toledo, Oregon. The site is an 81-acre former lumber mill site that operating for nearly 50 years. In 1995, CTSI purchased the site intending to continue lumber mill operations. Unfortunately, the lumber market declined in the mid-1990s. Since then, the site has been used occasionally for light industrial activities such as storage, wood re-saw operations, and other commercial/light industrial operations. Numerous phases of environmental assessment were conducted at the site over the past 20-plus years. These assessments detected contaminants related to historical wood-treating operations such as asbestos and lead-based paint in buildings, and petroleum hydrocarbons, semi-volatile organic compounds (SVOCs), and dioxins/furans in soil, sediment, and groundwater.

By completing Phase I and II environmental site assessments, remedial planning and cleanup, market analysis, and reuse planning, CTSI plans to convert the former Toledo Mill site into workforce housing, commercial/industrial development, and restore critical riverine habitat. Ultimately this redevelopment plan will provide benefits to CTSI, the community of Toledo, and regional wildlife.

DEQ will support this initiative by using 128(a) State Response grant funding to assist the CTSI with work plan development and technical assistance. DEQ encourages EPA to fund the CTSI Multipurpose Grant application to help the tribe reclaim the former mill site along the Yaquina
River. Please contact Mary Camarata, DEQ Western Region Brownfields Coordinator at
mary.camarata@deq.oregon.gov, 541-687-7435 if you have any questions.

Sincerely,

Michael E. Kucinski
Michael E. Kucinski (Nov 17, 2022 11:11 PST)

Michael E. Kucinski, Manager
Western Region Cleanup and Emergency Response

ec      Mike Kennedy, CTSI MikeK@ctsi.nsn.us
        Margaret Olson, EPA, olson.margaret@epa.gov
        Rebecca Wells-Albers, HQ Brownfields Coordinator, rebecca.wells- albers@deq.oregon.gov
FY2023 Brownfield Multipurpose Grant Application – Toledo Mill Site
Confederated Tribes of Siletz Indians

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:
1.a. Target Area & Brownfields: 1.a.i. Overview of Brownfield Challenges & Description of Target Area:
The Confederated Tribes of Siletz Indians (CTSI) is the most diverse confederation of Tribes in the United States made up of 27 Western Oregon, Northern California, & Southern Washington bands. Those recognized Tribal bands include the peoples of the Clatsop, Chinook, Klickitat, Molalla, Kalapuya, Tillamook, Alsea, Siuslaw/Lower Umpqua, Coos, Upper Coquille, Upper Umpqua, Tututni, Chetco, Tolowa, Takelma, Galice/Applegate & Shasta. CTSI’s ancestors spoke 10 completely different languages, each of which had multiple dialects & they brought with them deep connections to more than 20 million acres of ancestral territory which included all of Western Oregon from the summit of the Cascade Mountains to the Pacific Ocean & extending into what is now southwest Washington State & Northern California. This large & diverse territory is now home to over 3 million Oregonians.

Few things are more important to a Tribe than their lands; for without land, there would be no Tribe. This is especially true for CTSI as they have experienced many hardships while trying to maintain their ancestral territory & way of life. Managing tribal lands for sustenance & sovereignty of their people is the very fabric of CTSI’s Tribal community going back to the time before western expansion, the reservation, & division. In 1855, a 1.1-million-acre reservation was established for the permanent home of CTSI by President Franklin Pierce, fulfilling the stipulations of eight federal treaties. However, following massive reservation reductions, Congress passed the 1954 Western Oregon Termination Act (WOTA) & CTSI’s federally recognized status as a Tribe was revoked. In 1977 CTSI lobbied Congress to repeal this termination & CTSI regained federal recognition as a Tribe. Today, CTSI has 5,593 members living primarily in Siletz & the surrounding coastal communities of Toledo (Target Area), Newport, Lincoln City & other small towns on the Central Oregon Coast. In spite of generations of mistreatment, hardships, & displacement, CTSI continues work to recover as much as possible of what was lost for its people; their ancestral lands.

Since 1980, CTSI has increased its land base (primarily by purchasing properties) to 16,655 acres, including: 15,988 acres of timberland & 667 acres for cultural preservation, housing, economic development, & wildlife habitat enhancement. Most of CTSI’s land holdings (over 9,000 acres) are in Lincoln County. With their lands CTSI offers many programs & services to eligible tribal members. including housing, education, health, social & employment services. CTSI provides homes for 192 Tribal members & their families & over 1,000 jobs.

The Toledo Mill Site (the priority brownfield or “Site”) located on the Yaquina River in Toledo, Oregon represents one such land acquisition & opportunity venture for CTSI. Located in the Oregon Coastal town of Toledo, Oregon (Target Area with 3,546 residents1), the Site is a large 81-acre former lumber mill & wood treating facility that operated for nearly 50 years. In 1995, CTSI purchased the Site intending to continue mill operations. Unfortunately, the lumber market dried up in the mid-1990s & Oregon’s timber industry consolidated into larger more inland lumber mills. There are several other Target Area brownfields affected by this changed economy but none as large or with as much river frontage as the Site. The Toledo Mill Site & CTSI’s investment in a lumber operation ended & the dream to create economic opportunity from the Toledo Mill Site was never realized. CTSI stopped lumber operations on the Site in 1998 & it has since remained mostly vacant since only sparingly being used for storage, wood re-saw operations, & other light industrial ventures.

Today the Site is managed by CTSI’s economic development company (Siletz Tribal Business Corporation or STBC) to promote economic opportunities for CTSI on their properties. The Site is challenged by contaminants, poor access, steep slopes, a RCRA2-designated landfill, wetland & floodplain considerations, & other complexities. However, the Site also represents an opportunity for CTSI to create something clean & innovative & new. Cleaning up the Site will allow CTSI to 1) improve the environment; 2) create workforce housing; 3) build employment lands with a waterfront development; & 4) restore critical riverine habitat. Cleanup & reuse of the Toledo Mill Site will cleanup the environment & bring substantial benefits to the people of CTSI, the residents within the Target Area & our regional wildlife.

1 https://www.census.gov/
2 RCRA – Resource Conservation and Recovery Act
1.a.ii. **Description of the Priority Brownfield Site:** The Site consists of six Lincoln County tax lots & is mostly undeveloped with a few remnant lumber mill buildings that are currently occupied by tenants. The Site is zoned as industrial & straddles two local jurisdictions (City of Toledo [City] & unincorporated Lincoln County) & extends along approximately 4,000 feet of the east bank of the Yaquina River. The lumber mill, constructed around 1952 & operated until 1998. Subsequently, many of the Site buildings & structures were demolished or collapsed over the last 20-plus years. A handful of former mill buildings remain on the Site in various states of disrepair & there are concrete foundations from former structures however the facility was never properly decommissioned or cleaned up.

The Site is split into three distinct areas: 1) Upper Mill Site; 2) Lower Mill Site; & 3) Log Yard. The Upper Mill Site was used for warehousing, as an equipment yard, & has a RCRA-designated wood waste landfill that has been managed by CTSI since the late 1990’s. Former lumber manufacturing & processing took place at the Lower Mill Site & is the primary area of contamination. Much of the Lower Mill Site and the entire Log Yard, lies within the 100-year floodplain. Approximately 90% of the Log Yard has been mapped as wetlands. There is approximately a 100-foot elevation change from the Yaquina River to the Upper Mill Site.

Numerous phases of environmental assessment have been conducted at the Site over the past 20-plus years, detecting contaminants related to historical wood treating operations, asbestos & lead-based paint in buildings, petroleum hydrocarbons, semi-volatile organic compounds (SVOCs), & dioxins/furans in soil, groundwater & Yaquina River sediment. CTSI has been assessing Site environmental conditions as available funding has allowed. Most recently, in 2019 it was determined that the Site was a high priority for reuse within the Target Area because of the size of the property, the zoning (industrial) & the waterfront location. CTSI has completed Phase II Environmental Site Assessments (ESAs), most recently in 2019, to determine contaminant levels at the Site & define areas that require remediation (Areas of Concern or AOCs). In 2022, CTSI/STBC completed reuse planning for the Site. The ESA & reuse planning were conducted with DEQ & EPA oversight, using EPA brownfields grant funding obtained by the Oregon Cascades West Council of Governments (OCWCOG [BF-01J40301-1]). The recommendations from previous assessment, remedial planning, & the recently completed master planning exercise form the basis for the assessment & cleanup work to be completed using the EPA Brownfield Multipurpose Grant (EPA Grant) requested herein.

**1.b. Revitalization of the Target Area: 1.b.i. Overall Plan for Revitalization:** CTSI prepared the *Toledo Mill Master Plan (Master Plan)* in February 2022 as part of the OCWCOG’s EPA Brownfields Assessment Grant. The Master Plan presents existing conditions on the Site & defines a reuse strategy for the Site that involves a nature-based solution where appropriate. Currently, the Site is mostly abandoned with legacy industrial structures & infrastructure, site contamination, poor access & poor drainage that is preventing CTSI/STBC from securing land leases/sales to end users. The *Comprehensive Plan (CTS 2005)* includes goals to protect natural resources, develop Target Area recreational amenities, & improve economic viability for CTSI. The *Hazard Mitigation Plan (CTS 2020)* calls for flood mitigation on the Site & the *Toledo Comprehensive Plan (City 2022)* has policies to protect waterfront areas & encourage small business startups to promote economic growth. The Site’s Master Plan aligns with & advances these regional policies & presents specific strategies to put the Site back into productive use with over 15-acres of developable lands for employment &/or workforce housing & nearly 65-acres of habitat/river/wetland/forest restoration. The Master Plan was supported by a Natural Capital Analysis that studied preservation options & their related costs.

Reuse of the Site is complicated by floodplains, wetlands, & contaminants. A cleanup plan, natural resource management plan, & stormwater master plan are notable near-term action items to position the Site for a new future. The EPA Grant would be used to implement key components of the Master Plan including additional ESAs, soil stability studies, cleanup, wetland/natural resource studies & designs, & stormwater planning. The Master Plan aims to ready the Site for new business ventures along the Yaquina River to create facilities for light manufacturing, warehousing, aquaculture, research/development &/or other market-driven facilities. CTSI/STBC intends to operate/manage the Site with lease agreements to private users.

CTSI/STBC must construct a new Site entrance, upgrade drainage/utility infrastructure, & create shovel-ready lots to attract end users. End users for the Upper Mill Site are expected to be residential
or commercial tenants reliant on new construction. End users of the Lower Mill Site are expected to be operators of light industrial/manufacturing facilities that can utilize the river & rail line for their business with the potential adaptive reuse of existing structures or reliant on new construction. The end use of the Log Yard would be for recreation (hiking, fishing, bird watching) & conservation as wildlife habitat. These end uses would greatly benefit the Target Area by creating local jobs & would allow CTSI to manage a significant river conservation program.

1.b.ii. Outcomes & Benefits of Overall Plan for Revitalization:
CTSI is now working with public & community partners on plans to assess, clean up, & transform the Site as an extension of the City. This reuse plan would serve many purposes that are important to CTSI & the community of Toledo by increasing affordable housing capacity, creating economic opportunities, building flood resiliency & creating a significant conservation easement for habitat restoration. This reuse plan will create tribal resiliency & an opportunity to continue CTSI’s mission to live in harmony with the land as a sovereign nation. Anticipated outcomes & benefits for revitalization include the following major themes:

Job Creation & Property Tax Revenue: Site reuse could produce ~107K-sf of new manufacturing/industrial buildings (assuming 20% of the Site is redeveloped). This would create 130-312 jobs including temporary construction & permanent manufacturing jobs & generating over $248,000 in property tax revenue per year for local governments. The site will add jobs to the surrounding rural community, lessening commuting trips & associated costs for local households.

Income Generating Uses: The current site conditions limit CTSI/STBC’s ability to generate much income that would be passed on to CTSI members. Site reuse (& cleanup) presents opportunities for CTSI/STBC to sell/lease individual lots on the Site to business entities; today, the Site is a financial liability as taxes & maintenance costs exceed revenue generation.

Small Business Start-ups: Site reuse will create opportunities for emerging businesses & start-up enterprises. The Master Plan proposes 1- to 2.7-acre lots conducive for light manufacturing, fabrication & warehouse operations. CTSI will target energy efficient operations for small business start-ups.

Habitat Restoration: The reuse plan includes ~65 acres of forest, wetland, & riverine conservation. Plans include restoration activities (removing dikes, connecting to the river, planting native plants) to enhance habitat function/value, benefiting the regional ecosystem. Restoration practices will be guided by the well-established methods of Traditional Ecological Knowledge (TEK).

Flood Mitigation: Conservation activities will support flood mitigation efforts by removing unnecessary impervious surfaces & developing a modern stormwater management system & restoring the Site’s natural hydrology. New buildings will meet Federal Emergency Management Agency’s (FEMA’s) elevation requirements to guard against flooding & to reduce insurance fees. Each lot will include water quality features to clean runoff before discharge. Housing, schools, shelters, & public assembly areas are not planned in flood zones to be compliant with land use rules.

Recreation: The Master Plan proposed trails, open space, & river access in conservation areas. These elements will expand recreational amenities for Target Area residents, CTSI members & tourists.

Rail Use: The planned industrial uses can capitalize on the existing rail line that bisects the Site to move freight/finished goods & receive raw materials. This lessens the demand for trucking to the Site.

Cleanup: Pursuant to the Master Plan, site reuse will include cleanup/abatement activities of the common areas & concurrently with roadway/utility installation. Cleanup plans on individual lots will be tailored to the end users/land uses & will be performed in concert with project development.

Growth Management: Site reuse will occur on previously developed property & within the Toledo urban growth boundary; providing future jobs within an established community as opposed to developing raw forest land/contributing to urban sprawl.

1.c. Strategy for Leveraging Resources: 1.c.i. Resources Needed for Site Reuse: As a federally recognized Tribe, CTSI is eligible & well-positioned to receive funding from a range of federal, state, & local sources as well as private & foundation funding. This includes funding set aside specifically for tribes. The anticipated impacts of the Site reuse - environmental rehabilitation, cultural, historical & natural resource protection, restoration of public river access, & the economic development potential – are already leveraging funding & project support. Environmental assessment & cleanup completed using the EPA Grant will strengthen this leveraging power by eliminating environmental barriers to reuse & moving the Site toward shovel-ready status. This action will continue to attract additional project partners.
Recently, CTSI participated as a Coalition Member for OCWCOG’s EPA Brownfield Grant. Through this participation, EPA Brownfield grant funds were used for a Phase II ESA (CTSI matched grant funding [paid $45k] for this assessment) & a Master Plan to consider development alternatives for the Site. In October 2022, CTSI obtained a $25k Integrated Planning Grant from Business Oregon to conduct an environmental file review & to create a feasibility study (FS) evaluating wetlands, floodplain, & habitat quality on the Site & evaluating conservation options on the Site. This work will inform the assessment & cleanup & reuse planning described in Sec. 3.

CTSI plans to continue leveraging available resources to evaluate the Site to determine the highest & best use which is likely to include a mix of developable parcels & a sizeable habitat restoration area. Promoting the Site as a restoration opportunity along the Yaquina River is highly likely to attract partnerships with federal, state & non-profit organizations that are looking to support habitat restoration projects in an Estuary with known threatened species (Oregon Coast Coho Salmon, Oncorhynchus kisutch). One such identified partner is the Mid Coast Watershed Council (MCWC) which is a nonprofit organization that coordinates, funds, & manages ecological restoration projects on the Oregon Coast that includes the 233-acre tidal marsh restoration directly adjacent to the Site. Funding for this work was received from the Oregon Watershed Enhancement Board, the US Fish & Wildlife Service Fish Passage Program, with additional support from the Pacific Marine & Estuarine Fish Habitat Partnership, & the Oregon Wildlife Foundation. Project partners include the City of Toledo, CTSI, the Wetlands Conservancy, Pacific States Marine Fisheries Commission, Oregon Department of Fish & Wildlife, & US Fish & Wildlife. CTSI is interested in continuing these partnerships to leverage additional resources toward reuse of the Site.

Funds & assistance available to CTSI for environmental assessment & cleanup, beyond this EPA Grant, include, funds from Administration for Native Americans Social & Economic Development Strategies (SEDS) program, EPA & Oregon Department of Environmental Quality (DEQ) Targeted Brownfield Assessments & the National Ocean & Atmospheric Administration’s (NOAA’s) Community-Based Habitat Restoration grant, which offers funding for restoration projects that promote coastal resiliency. Also, the FEMA Building Resilient Infrastructure Communities Program funds resilience & infrastructure projects & includes a $20 M Tribal set-aside to support infrastructure projects with nature-based solutions such as land conservation & stormwater management.

CTSI also has access to a range of funding sources for cultural & natural resource preservation as a component of the proposed reuse including: 1) Federal Tribal Heritage grants; 2) several grants offered by the State Historic Preservation Office; 3) the Kinsman Foundation, which offers historic preservation grants; & 4) the National Trust for Historic Preservation.

1.c.ii. Use of Existing Infrastructure: Revitalization plans include the creation of several commercial/industrial adaptive reuse lots that would be well served by the existing rail lines, roadways, & river access. The Site is mostly within the City of Toledo, which is fully served by modern, high-quality infrastructure including roads, stormwater, drinking water, electricity & natural gas, & communications/internet that the Site will tie into as part of redevelopment. Some upgrades to utilities & infrastructure may be required depending on final development plans. An access improvement plan, utility survey, grading plan, cut fill analysis & stormwater/drainage planning are included as part of this EPA Grant funded scope of work as reuse planning exercises (Sec. 3a, Task 3) for needed Site improvements to attract end users & spur development.

CTSI is eligible for numerous funding sources for infrastructure upgrades including: Oregon Brownfield Technical Assistance & Integrated Planning Grants & Loans; Oregon Safe Drinking Water Revolving Loan Fund; Oregon Special Public Works Fund; Oregon Water/Wastewater Fund; Oregon Regional Solutions Infrastructure Fund; US Department of Homeland Security’s Building Resilient Infrastructure & Communities Grant; USDA’s Community Facilities Direct Loan & Grant Program; USDA’s Rural Development Single Family Housing Programs; USDA’s Landscape Scale Restoration Grant Program 2023 for Tribes; & US Department of Commerce Economic Development Assistance Programs. In keeping with the spirit of the Site’s history, setting, & reuse plans, CTSI will incorporate energy efficient developments and green infrastructure upgrades that incorporate nature-based solutions such as bioswales, green roofs, & stormwater capture/reuse as part of their reuse plan.
2. COMMUNITY NEED & COMMUNITY ENGAGEMENT: 2.a. Community Need: 2.a.i. The Community’s Need for Funding: CTSI currently has 5,593 members. Over the past 200 years the community has been severely diminished by diseases brought to Tribal lands by settlers & traders, scattered by removal from their homelands, & disadvantaged by Termination. CTSI has not recovered from the environmental & policy injustices going back 200 years & the economic conditions experienced by CTSI members & those living in the Target Area reflect this history, as shown in Table 1. The median household income of CTSI members is just 70% of the statewide median income & CTSI member poverty is almost three times the statewide rate. Tribal funds are dedicated to the education, healthcare, & support of its most vulnerable members but there is more demand than available resources. The Target Area, including Census Tract 9514, has a demonstrable need for funding to support economic development projects. The rural setting & limited economic opportunity have led to unemployment at 12.3% within the Census Tract, nearly 4 times the national avg. EPA Grant funding for cleanup & reuse of the Site will allow CTSI to continue dedicating resources to critical member needs including education, housing, economic development, natural & cultural resource conservation, & health & wellness services. This grant is critical to helping the under-resourced CTSI steward the Site into an important asset by bringing it back to healthy & productive use providing economic opportunity for CTSI & for the Target Area.

2.a.ii. Threats to Sensitive Populations: 2.a.ii(1) Health or Welfare of Sensitive Populations: Sensitive populations living within the Target Area include children, pregnant women, & low-income residents. These community members are impacted directly & indirectly by brownfields in their community every day at higher rates than others because of where they live & work. Statistically our sensitive populations are exposed to brownfield contaminants as they perform the functions of everyday life. People living in the Target Area are disproportionately exposed to brownfield-related blight resulting in a lower sense of safety which can cause mental distress & associated health impacts. By emphasizing assessment & cleanup on high priority brownfield sites where sensitive populations live, we will provide the greatest program benefits.

The EPA’s Environmental Justice (EJ) Screening Tool (EJScreen) provides a combination of environmental & socioeconomic information to consider “Environmental Indicators” that may impact EJ & sensitive populations within a given area. EJScreen paints a highly variable picture regarding the presence & welfare of sensitive populations within the project geography mostly because Tribal members are spread across the region. However, there are environmental indicators within the Target Area at high percentages that may adversely impact the sensitive populations presented in Table 2. Older homes (pre-1960) are prevalent within the Target Area meaning that sensitive populations are living in homes with a higher percentage of lead-based paint. In addition, because of the economic engine in the community (pulp & paper mill) there is a high percentage of wastewater discharge to regional waterbodies; the Target Area is in the 84th percentile for wastewater discharges in Oregon. These two environmental indicators show that the residents in the Target Area have a higher potential for exposure to EJ burdens from contaminant sources in the community. The EPA Grant will help address these challenges by cleaning up a high priority brownfield site & reducing exposure to sensitive populations.

<table>
<thead>
<tr>
<th>Table 1 - Indicator</th>
<th>Tribe</th>
<th>Census Tract</th>
<th>Oregon</th>
<th>US</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>5,593</td>
<td>3,185</td>
<td>~4M</td>
<td>~323M</td>
</tr>
<tr>
<td>Median Household Income</td>
<td>$46,429</td>
<td>$50,799</td>
<td>$65,667</td>
<td>$64,994</td>
</tr>
<tr>
<td>Unemployment Rate</td>
<td>17.8%</td>
<td>12.3%</td>
<td>3.4%</td>
<td>3.4%</td>
</tr>
<tr>
<td>Poverty (all people)</td>
<td>30.6%</td>
<td>22.9%</td>
<td>12.4%</td>
<td>12.8%</td>
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<tr>
<td>Poverty Age &lt;18</td>
<td>40.6%</td>
<td>24.9%</td>
<td>15%</td>
<td>17.5%</td>
</tr>
<tr>
<td>Bachelor’s degree or Higher (25 years &amp; over)</td>
<td>12.9%</td>
<td>23%</td>
<td>34.4%</td>
<td>32.9%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 2 - EJ Screen Environmental Indicator</th>
<th>Target Area Percentile in Oregon</th>
</tr>
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<tbody>
<tr>
<td>Lead Paint</td>
<td>79th</td>
</tr>
<tr>
<td>Wastewater Discharges</td>
<td>84th</td>
</tr>
</tbody>
</table>

3 Tribal data: [www.census.gov/tribal/index.html](http://www.census.gov/tribal/index.html)
4 Census Tract 9514, State & US data: American Community Survey 5-Year Estimates
5 Target Area = US Census Block Groups 9415 which include the Site & Toledo, Oregon
**2.a.ii(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions:** People living in rural areas are generally at higher risk of disease than people living in urban areas. Additionally, poverty, a significant issue in the Target Area, is strongly linked to poor health outcomes. Statistically, Lincoln County is one of the least healthy counties in Oregon & ranks 27th out of 36 Oregon counties for Health Outcomes which represent county-wide health in terms of length, & quality of life. Health Factors in Lincoln County rank 33rd out of 36 Oregon counties. These indicators show that Lincoln County residents have a greater than normal incidence of disease & adverse health conditions compared to other Oregon regions based on the environment, social & economic factors, clinical care, & health behaviors. These health factors lead to poor health outcomes such as poor quality of life & premature death.

<table>
<thead>
<tr>
<th>Table 3</th>
<th>Lincoln County</th>
<th>Oregon</th>
<th>US</th>
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</thead>
<tbody>
<tr>
<td>Adult Obesity&lt;sup&gt;5&lt;/sup&gt;</td>
<td>34%</td>
<td>29%</td>
<td>4.9%</td>
</tr>
<tr>
<td>Stroke&lt;sup&gt;6&lt;/sup&gt;</td>
<td>4.4%</td>
<td>2.6%</td>
<td>2.8%</td>
</tr>
<tr>
<td>Adult Smoking&lt;sup&gt;5&lt;/sup&gt;</td>
<td>19%</td>
<td>15%</td>
<td>16%</td>
</tr>
</tbody>
</table>

Rural residents are at greater risk of death from: 1) Heart disease; 2) Cancer; 3) Stroke; 4) Unintentional injury (e.g. substance abuse); & 5) Chronic lower respiratory disease. After cancer, cardiovascular disease is the second leading cause of death in Lincoln County. Within rural areas, members of racial/ethnic minority, Tribal, & other groups are at higher risk for poor health outcomes. Common factors resulting in higher risk of poor health outcomes in rural areas include: 1) Less access to health care because of fewer providers/facilities; 2) Exposures to environmental hazards, (pollution, poor air & water quality); 3) Higher rates of high blood pressure & obesity; 4) Less physical activity; 5) High rates of poverty; & 6) Higher tobacco use.

Social & economic factors & physical environment are key factors in community health. CTSI’s reuse strategy will: 1) Improve employment rate & income through family-wage job creation; 2) Reduce the percent of income spent on housing by promoting construction of affordable housing; 3) Reduce environmental hazards through the assessment/cleanup of brownfields contaminants. This reuse strategy coupled with other efforts to improve community health, will lead to improved health for Lincoln County residents.

**2.a.ii(3) Promoting Environmental Justice:**

Since Euroamerican colonization there has been a drastic decline in a wide range of Indigenous cultural practices as well as Tribal sovereignty & biodiversity. The effects of disease forced removals, relocation, & deculturation that disrupted tribal societies are just now being acknowledged. For CTSI this acknowledgement is the beginning of EJ.

It is the mission statement of CTSI’s Natural Resources Department to “care for, protect, enhance & provide for the wise use of all of CTSI’s natural resources in a manner which will ensure that all generations to come will benefit from these resources”. This philosophy applies to all lands to which CTSI is historically tied, including its ancient, aboriginal, ancestral lands, the reservation, & its current & future land holdings. By promoting this stewardship of tribal lands CTSI is working to improve health outcomes for all their members & the community at large. This is EJ, & has long been practiced by tribes & CTSI. Environmental justice initiatives will continue to be supported by CTSI through an equitable development approach to the Site with intentional strategies as described in Sec. 1.b.i (Overall Revitalization Plan). CTSI will seek participation from all community members on decisions that shape their region & neighborhoods. Equitable development on the Site will include affordable housing, will create jobs, will provide access to local capital, & will restore critical habitat; & will be done with EJ as a principle.

**2.b. Community Engagement: 2.b.i Prior/Ongoing Community Involvement**

Community engagement specific to this grant began in earnest when CTSI participated as a Coalition Member for OCWCOG’s Brownfield Program. In a virtual public meeting on March 28, 2022, CTSI presented their work on the Site through OCWCOG’s brownfield program & hosted a group of local officials to tour the Site. Since that time CTSI/STBC have shared the plan to apply for an EPA

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<sup>5</sup> Lincoln County Community Health Assessment 2018-2022
<sup>6</sup> https://www.countyhealthrankings.org/explore-health-rankings/oregon/lincoln?year=2022
<sup>8</sup> https://www.fda.gov/consumers/minority-health-and-health-equity-resources/rural-health
Confederated Tribes of Siletz Indians

Brownfield Grant to continue their brownfield assessment & cleanup work at several public meetings & forums; this includes the STBC CEO presenting on a panel discussing the Site & EPA’s brownfield program at the Oregon Brownfields & Infrastructure Summit in October 2022.

CTSI will host at least five additional grant-related public events during the 5-year grant term to inform the public & solicit input on the project. The events will be held at key milestones which may include when news of the grant award is received, during planning stages (Task 3) & during cleanup (Task 4). CTSI can hold public meetings virtually or in person depending on interest & content and will create COVID-safe spaces to hold public meetings. CTSI can also record presentations for posting on CTSI & partner websites. CTSI will prepare signage for display during the project to inform the public about project activities & noting that it was funded by an EPA Brownfield Grant.

### 2.b.ii. Project Involvement & 2.b.iii. Project Roles:

<table>
<thead>
<tr>
<th>Organization &amp; Contact Information</th>
<th>Project Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetlands Conservancy</td>
<td>The Wetland Conservancy would provide support &amp; guidance for how to enhance/manage Site wetlands.</td>
</tr>
<tr>
<td>Paul Engelmeyer, Preserve Manager</td>
<td></td>
</tr>
<tr>
<td><a href="mailto:info@wetlandsconservancy.org">info@wetlandsconservancy.org</a></td>
<td></td>
</tr>
<tr>
<td>Mid-Coast Watersheds Council</td>
<td>MCWC is an organization with shared environmental interests &amp; was a partner with CTSI in creating the conservation easement adjacent to the Site.</td>
</tr>
<tr>
<td>Evan Hayduk, 541-265-9195</td>
<td></td>
</tr>
<tr>
<td>Lincoln County Soil &amp; Water Conservation District</td>
<td>The Lincoln County Soil &amp; Water Conservation District would provide support &amp; guide conservation aspects of the project, as they are determined.</td>
</tr>
<tr>
<td>Alan Fujishin, <a href="mailto:info@lincolnswcd.org">info@lincolnswcd.org</a></td>
<td></td>
</tr>
<tr>
<td>Oregon Department of Agriculture</td>
<td>The ODA Water Quality Program will advise on water quality considerations &amp; potential agricultural opportunities when developing Site reuse alternatives.</td>
</tr>
<tr>
<td>Olivia Jasper, Water Quality Specialist</td>
<td></td>
</tr>
<tr>
<td><a href="mailto:Olivia.Jasper@oda.oregon.gov">Olivia.Jasper@oda.oregon.gov</a></td>
<td></td>
</tr>
<tr>
<td>City of Toledo</td>
<td>The City of Toledo will assist with zoning assessments, land use compatibility studies, &amp; other facets of the project once a reuse plan is finalized.</td>
</tr>
<tr>
<td>Judy Richter, City Manager</td>
<td></td>
</tr>
<tr>
<td><a href="mailto:Judy.Richter@cityoftoledo.org">Judy.Richter@cityoftoledo.org</a></td>
<td></td>
</tr>
<tr>
<td>Port of Toledo</td>
<td>The Port is supportive of the project &amp; will assist CTSI determine a reuse plan for the Site to support regional economic growth &amp; the Port’s mission to expand.</td>
</tr>
<tr>
<td>Debbie Scacco, Port Manager</td>
<td></td>
</tr>
<tr>
<td><a href="mailto:debbie.scacco@portoftoledo.org">debbie.scacco@portoftoledo.org</a></td>
<td></td>
</tr>
<tr>
<td>Oregon Health Authority</td>
<td>The OHA Brownfield Program will assist the County Health Department &amp; Tribal health experts with measuring &amp; evaluating project health outcomes.</td>
</tr>
<tr>
<td>Courtney Fulmineer</td>
<td></td>
</tr>
<tr>
<td><a href="mailto:Courtney.fulmineer@dhsoha.state.or.us">Courtney.fulmineer@dhsoha.state.or.us</a></td>
<td></td>
</tr>
<tr>
<td>Oregon DEQ</td>
<td>CTSI will continue to work closely with DEQ on the project to ensure assessment &amp; cleanup activities comply with state requirements &amp; standards.</td>
</tr>
<tr>
<td>Mary Camarata, Brownfields &amp; Regional Solutions Coordinator</td>
<td>541.687.7435</td>
</tr>
<tr>
<td>Business Oregon</td>
<td>Business Oregon has been supporting the project with grant funds &amp; supports CTSI’s objective to balance regional economic growth with ecological restoration.</td>
</tr>
<tr>
<td>Karen Homolac, Brownfield Director</td>
<td></td>
</tr>
<tr>
<td><a href="mailto:karen.homolac@biz.oregon.gov">karen.homolac@biz.oregon.gov</a></td>
<td></td>
</tr>
<tr>
<td>OCWCOG</td>
<td>The OCWCOG managed an EPA Brownfield Grant in the Yaquina River estuary for which CTSI was a coalition member. OCWCOG will support community engagement efforts &amp; advise on grant management.</td>
</tr>
<tr>
<td>Justin Peterson, Community &amp; Economic Development Planner</td>
<td><a href="mailto:jpeterson@ocwco.org">jpeterson@ocwco.org</a></td>
</tr>
<tr>
<td>Economic Development Alliance of Lincoln County - 541 867-8579</td>
<td>EDALC is an organization of business &amp; community leaders that promotes business across Lincoln County and will assist CTSI attract end users to the Site.</td>
</tr>
<tr>
<td>Paul Schuytema, Executive Director</td>
<td></td>
</tr>
<tr>
<td>(541) 574-0320</td>
<td></td>
</tr>
<tr>
<td>Northwest Coastal Housing</td>
<td>NW Coastal Housing is a Lincoln County non-profit committed to developing affordable housing options. CTSI would partner with NW Coastal Housing to consider affordable housing options on the Site.</td>
</tr>
<tr>
<td>Sheila Stiley, Executive Director</td>
<td></td>
</tr>
</tbody>
</table>

2.b.iii. Incorporating Community Input: CTSI meets regularly with Tribal Council & various regional leaders on environmental, social, & community initiatives involving the Site & Target Area. CTSI provides updates on activities underway at the Site while seeking feedback from stakeholders on a
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Confederated Tribes of Siletz Indians

regular basis. CTSI will continue these meetings throughout the life of the EPA Grant to keep Tribal Council, project stakeholders & the community informed about project outcomes.

At project kick off, CTSI will prepare an EPA Grant-specific Public Involvement Plan (PIP) with input from project partners to guide & track outreach efforts. The PIP will document methods for harnessing existing experience, tools, methods, & networks established from other Tribal community engagement activities & will include a schedule of outreach events, methods for publicizing grant news & will specify project partners & their role(s). Project information will be shared with the community on at least a quarterly basis during the grant term via presentations, community meetings, via CTSI’s monthly newsletter, press releases, & on CTSI’s website: www.ctsi.nsn.us

Community input will be gathered using various tools including surveys or questionnaires at events, capturing input during presentations, & from comments provided directly to CTSI via their website, emails, & phone calls. CTSI’s community engagement activities will be summarized in the quarterly project progress reports & in communications with the community via tools like Frequently Asked Questions posted on CTSI’s website, fact sheets & articles addressing specific issues & questions.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS:

3a. Description of Tasks/Activities & Outputs: 3a.i Project Implementation & 3a.iii Project Schedule: The EPA grant funded activities & schedule are described below.

<table>
<thead>
<tr>
<th>TASK 1: PROJECT MANAGEMENT</th>
<th>Lead: CTSI assisted by a Qualified Environmental Professional (QEP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementation: CTSI will monitor project scope, schedule, budget, &amp; compliance with grant terms &amp; conditions including timely reporting &amp; drawdowns. After grant award but prior to the start of the grant term, CTSI will procure a QEP through a process that complies with CTSI &amp; EPA procurement rules. Early procurement of the QEP will ensure CTSI &amp; the QEP can begin grant activities at the very start of the grant term. We anticipate attending one regional &amp; one national brownfields conference by the STBC CEO.</td>
<td></td>
</tr>
<tr>
<td>Schedule: CTSI will complete up to 20 quarterly reports &amp; up to 5 annual reports on time. Final grant closeout report will be submitted within 90 days of the end of grant term.</td>
<td></td>
</tr>
<tr>
<td>Outputs: Quarterly Reports; EPA Assessment, Cleanup, &amp; Redevelopment Exchange System (ACRES) database updates as needed; Annual Disadvantaged Business Enterprise reports &amp; Federal Financial Report; Attendance at 2 brownfield conferences by STBC CEO; Final Grant Closeout Report.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TASK 2: FOCUSED PHASE II ESA (REMEDIAL INVESTIGATION [RI])</th>
<th>Lead: QEP, directed by/reporting to CTSI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementation: Task 2 focuses on completing Phase II ESA activities that are needed to identify the nature &amp; extent of contaminants that require cleanup on the Site. CTSI will direct the QEP to prepare a Quality Assurance Project Plan (QAPP), &amp; Health &amp; Safety Plan (HASP) to guide all EPA Grant-funded work. CTSI/QEP will complete Endangered Species Act &amp; National Historic Preservation Act (NHPA) clearances to cover all intrusive work at the Site. CTSI/QEP will prepare a RI Work Plan based on the recommendations developed during previous work scopes to specifically fill data gaps that will be needed to implement Site cleanup. CTSI will work closely with the DEQ &amp; will enroll the Site into DEQ’s Voluntary Cleanup Program. The Task 2 Work Plan will be submitted for DEQ &amp; EPA Review prior to implementation.</td>
<td></td>
</tr>
<tr>
<td>The Task 2 Work Plan scope will include:</td>
<td></td>
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<tr>
<td>• A targeted geophysical survey will be conducted on the Lower Mill Site portion of the Site. Any identified underground storage tanks will be assessed in accordance with DEQ regulations.</td>
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<tr>
<td>• Inventory &amp; removal of chemicals &amp; hazardous substances remaining on the Site from past operations.</td>
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<tr>
<td>• Survey of regulated building materials (RBMs) in Site buildings including asbestos, lead paint, &amp; mercury &amp; PCBs in light tubes &amp; ballasts. (Abatement of RBMs in Site buildings will be conducted as needed based on findings to support near-term reuse as leased tenant space &amp;/or to facilitate demolition).</td>
<td></td>
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</tbody>
</table>
**TASK 3: CLEANUP & REUSE PLANNING**

**Lead:** QEP, directed by/reporting to CTSI

**Implementation:** Task 3 will develop cleanup & reuse alternatives based on the findings from Task 2 in a coordinated effort to promote creative solutions to protect human health & the environment while moving the Site closer to shovel-ready status. Task 3 activities will consist of:

- Preparing draft & final versions of a cleanup plan for the Site as an Analysis of Brownfield Cleanup Alternatives (ABCA) for DEQ & EPA Review.
- Completing a Site-wide underground utility survey: The survey will evaluate location, dimension, depth, integrity, & backfill of utilities & will include a review of available records, survey methods, &/or a camera survey to inform existing conditions analysis. A utility assessment will be completed to identify infrastructure upgrade needs based on Site development.
- Reuse planning will include: access improvement plan, grading plan, cut/fill analysis, & a stormwater/drainage plan. These activities are necessary to develop the Site & the cleanup plan will be incorporated into reuse planning to maximize efficiency with creative solutions.
- CTSI will update & finalize the conservation easement Feasibility Study (FS) described in Sec. 1.2.
- A matrix will be written to identify permits needed for cleanup & creation of a conservation easement on the Site. CTSI/QEP will coordinate with state & federal agencies including Oregon DSL, USACE, & DEQ to determine specific permits required for the proposed actions.

**Outputs:** ABCA, Conservation Easement Feasibility Study, Access Improvement Plan, Grading Plan, Cut Fill Analysis, Stormwater/Drainage Plan, & Permitting Plan/Matrix

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**TASK 4: CLEANUP**

**Lead:** QEP directed by & reporting to CTSI

**Implementation:**

- Apply for & acquire necessary permits for proposed remedial action as determined in Task 3.
- Potential Remedial Actions (dependent on assessment data gathered during Tasks 2 & 3):
  - Excavate & dispose of contaminated media from specific AOCs where data indicate removal/disposal is required. Impact areas would be backfilled & regraded.
  - Engineered capping of contaminated media depending on determinations in the ABCA.
  - Recommendations regarding engineering controls to be incorporated into future construction.
- Prepare Draft & Final versions of Task 4 Cleanup Report including conceptual site model, risk evaluation, & all cleanup related disposal documentation for DEQ & EPA review.
Contaminated Media Management Plan (CMMP) & filing deed restrictions with DEQ.
- Coordinating a surveyor to replot the Site according to reuse plans adopted in Task 3.
- Focused reuse planning that refines & carries forward the overall reuse plans described in Sec. 1.b.i is in the early stages & has been partially funded by CTSI & other resources. Planning is currently focused on evaluating natural resources on the Site to determine a conservation plan.

<table>
<thead>
<tr>
<th>Task 4 Schedule</th>
<th>Permits by: 1Q 2026</th>
<th>Cleanup Activities: 2Q 2026 – 3Q 2026 (~3 months)</th>
<th>CMMP &amp; Deed Restriction 4Q 2026</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outputs: CMMP, Waste Disposal Documentation; Draft/Final Cleanup &amp;/or Closure Report</td>
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</table>

**Task 5: Community Engagement**

**Lead:** CTSI assisted by the QEP

**Implementation:** 1) Prepare Public Involvement Plan (PIP); 2) Hold at least five community meetings during the grant term & post recordings of virtual meetings on CTSI & partner websites; 3) Prepare outreach materials including fact sheets, press releases, website/Facebook page project updates, newsletter articles, & signage explaining project activities; & 4) Solicit & respond to community input via electronic surveys, interactive community events such as workshops & charrettes, Q&A at outreach events, & calls & emails from community members to grant project representatives at CTSI; document input & responses on Q&A summary sheets & in Quarterly Progress Reports to EPA.

**Schedule:** The PIP & fact sheet will be finalized in the first quarter of the grant term. Five public outreach events will be held at key milestones as described in Sec. 2.b.iii. Press releases will also be prepared for project milestones & to publicize outreach events. CTSI has already established a project webpage on its website & will add news & documents as they become available throughout the grant term. Input & responses will be documented on at least a quarterly basis.

**Outputs:** PIP; 5 community meetings held with notes/presentation materials; 2-3 project fact sheets & press releases; project updates on Tribal website; documentation of public input

**3.a.ii Identifying Additional Sites:** Additional sites are not anticipated to be evaluated using the EPA Grant. The tasks listed in Sec. 3.a.i are anticipated to consume all available EPA Grant funds & CTSI expects to pursue additional funding from leveraged resources to complete the project. If grant funds remain after completing Site assessment & cleanup tasks, CTSI will work with project stakeholders & EPA to identify other brownfield sites in the Target Area that would have the greatest impact on the community.

**3.b. Cost Estimates:** The budget below was prepared with the assistance of an environmental professional knowledgeable about Site conditions. The budget assumes an avg QEP rate of $150/hour; & an avg CTSI labor rate of $60/hour with the CTSI fringe benefit rate set at 32% of the labor rate.

<table>
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</thead>
<tbody>
<tr>
<td><strong>Personnel</strong></td>
<td>$2,720</td>
<td>$1,700</td>
<td>$1,700</td>
<td>$1,700</td>
<td>$2,720</td>
<td>$10,540</td>
</tr>
<tr>
<td><strong>Fringe Benefits</strong></td>
<td>$1,280</td>
<td>$800</td>
<td>$800</td>
<td>$800</td>
<td>$1,280</td>
<td>$4,960</td>
</tr>
<tr>
<td><strong>Travel</strong></td>
<td>$3,000</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$1,000</td>
<td>$4,000</td>
</tr>
<tr>
<td><strong>Contractual</strong></td>
<td>$30,000</td>
<td>$135,000</td>
<td>$60,000</td>
<td>$487,500</td>
<td>$25,000</td>
<td>$740,000</td>
</tr>
<tr>
<td><strong>Other</strong></td>
<td>$500</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$500</td>
</tr>
<tr>
<td><strong>DEQ Oversight</strong></td>
<td>$0</td>
<td>$15,000</td>
<td>$15,000</td>
<td>$12,500</td>
<td>$0</td>
<td>$40,000</td>
</tr>
<tr>
<td><strong>TOTAL BUDGET</strong></td>
<td>$37,500</td>
<td>$152,500</td>
<td>$77,500</td>
<td>$502,500</td>
<td>$30,000</td>
<td>$800,000</td>
</tr>
</tbody>
</table>

*One personnel from STBC will attend one regional & one national brownfield conference.*

**Costs are for conference registration fees ($250/person x 2 conferences).**
Task 1, Project Management, Total $37,500: QEP Labor ($30,000) & CTSI Labor, Fringe, & Travel ($7,500): Reporting & Project Management (QEP: 200 hrs x $150/hour – 10 hrs/quarter for 5-year project. CTSI oversight of QEP: labor & fringe benefits: ($4,000); & travel fees (airfare, meals, & lodging) for two brownfield conferences (national & state) at ($1,500 each [$3,000 total]). Includes $500 for conference registration fees.

Task 2, Focused Phase II ESA, Total $152,500: QEP Labor: $45,000 (300 hrs x $150/hr) for: QAPP [$5,500]; HASP [$2,500]; Endangered Species Act/NHPA Clearances [$2,000]; planning, fieldwork, subcontractor oversight, reporting [$35,000: 233 hrs x $150/hr]; Lab Costs $35,000 (50 samples at $700/each); Subcontractors to QEP Costs $55,000 (Driller, Geophysical Survey, Regulated Building Materials Survey); $15,000 for DEQ oversight fees (avg $190/hour); CTSI oversight of QEP: labor & fringe ($2,500).

Task 3, Cleanup Planning & Reuse Planning, Total $77,500: QEP Labor: $60,000 (400 hrs x 150/hr: 90 hrs for cleanup plan, 75 hrs for roadway design, 60 hrs for stormwater/drainage plan, 75 hrs for utilities assessment, 50 hrs for cut/fill analysis, 50 hrs for grading plan); $15,000 for DEQ oversight costs (avg $190/hour); CTSI oversight of QEP: labor & fringe ($2,500).

Task 4, Cleanup, Total $502,500: QEP Labor $52,500 (350 hrs x $150/hr for planning, fieldwork, subcontractor oversight, & reporting); Remediation subcontractors $435,000 (Excavation & loading of soils from targeted AOCs [2,250 CY at $10/CY = $22,500]; Transportation & disposal of contaminated media [2,250 CY at $80/CY = $180,000]; Backfill & grading with clean fill cap 7,500 CY at $31/CY = $232,500]). $12,500 for DEQ oversight costs (avg $190/hour). CTSI oversight of QEP: labor & fringe ($2,500).

Task 5, Community Involvement, $30,000: QEP Labor $25,000 (167 hrs x $150/hr = $25,000) to assist CTSI with developing plans & content for fact sheets, press releases, websites, community events, & participation in community involvement events. CTSI oversight of QEP ($5,000 total): labor (45 hrs x $60/hr; fringe benefits: (32% of labor fees); & travel expense to up to 5 community meetings ($1,000).

3.c. Measuring Environmental Results: When preparing the Cooperative Agreement Work Plan, CTSI will develop a detailed schedule of key project milestones such as QAPP completion, task start & end dates, & planned community outreach events. At least monthly, CTSI will track & evaluate progress in achieving outputs & milestones against the work plan schedule. CTSI will set up biweekly calls with the QEP, inviting the DEQ & EPA as necessary, to evaluate project status & to address any deviations from Work Plans. CTSI will monitor the project budget concurrent with tracking the schedule, on at least a monthly basis. CTSI will document project outputs, outcomes, & results in the quarterly progress reports & in EPA’s ACRES database. Outcomes beyond the end of the grant term will also be tracked in the ACRES database. Anticipated outputs are described in Sec. 3b. Anticipated outcomes & results that CTSI will track include:

- Square ft of Site prepared for reuse
- Square ft of Site restored as habitat
- Number of jobs created
- Funding leveraged
- Historic resources protected
- Increase in property value
- Trails & open space created
- Reduction in volume of hazardous materials
- Amenities created

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

4.a. Programmatic Capability: 4.a.i. Organizational Capacity, 4.a.ii. Structure & 4.a.iii. Description of Key Staff: The 9-member Tribal Council is the elected government of CTSI. Tribal Council oversees an executive staff who oversee multiple departments with over 1,000 employees. CTSI has managed over $300M in federal & state funding since the late 1990s. CTSI has a Finance Department, Tribal Attorney’s Office, & an Audit Services Department who ensure compliance & oversight with respect to funding agreements.

Ann Lewis Project Manager is the Chief Executive Officer of STBC. She will oversee all assessment & cleanup activities under the EPA Grant. Ms. Lewis has over 25 years of experience managing properties & projects in Oregon for multiple Tribes, including those that involved environmental
assessment/remediation activities. **Mike Kennedy**, CTSI’s Interim General Manager & Director of CTSI’s Natural Resources (NR) Department will assist with grant management, compliance & reporting & will advise on evaluating the Site as an opportunity for habitat conservation. He has more than 35 years of experience working with CTSI. **Charles Getter**, Environmental Planner with CTSI’s Natural Resources NR Department will assist with managing the QEP to conduct assessment & remediation activities. Mr. Getter has 30 years’ experience with environmental assessment & remediation projects. **Dan McCue**, CTSI Chief Financial Officer, will assist with budget tracking, documentation, reporting, & drawdowns. Mr. McCue has over 25 years of experience managing finances for various entities, including Tribes. Mr. McCue will also assist with legal review & contractual & regulatory compliance activities with respect to this EPA Grant. Tribal staff will coordinate with the NR Department, Tribal Historic Preservation Office, & other departments, as needed throughout the grant term.

4.a.iv. Acquiring Additional Resources: CTSI has a procurement policy governing purchase of goods & services that sets forth the competitive selection processes. The procurement policy requires compliance with any federal funding requirements with respect to purchasing & program compliance. CTSI will comply with EPA’s solicitation clauses in the performance of this grant. CTSI’s legal department reviews contracts & agreements & its procurement department facilitates purchase orders & payments. CTSI will utilize the required procurement procedures in selecting consultants to implement the EPA Grant.

4.b. Past Performance & Accomplishments:

4.b.ii. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements:

4.b.ii.(1) Purpose & Accomplishments:

**Portland Harbor EPA Superfund State-Tribal Cooperative Agreement (EPA-CEP-02) 2019: ($78,909).** This funding covers the cost for CTSI participation in Portland Harbor assessment & cleanup activities as a Trustee. CTSI also receives funds from responsible parties to cover Tribal review of cleanup activities. The Portland Harbor Cleanup project involves significant community outreach efforts for which CTSI is a participant. Financial & program reporting has been deemed acceptable by EPA.

**Performance Partnership Grant EPA Federal-Tribal Cooperative Agreement (BG00J40402-4) 2016 – 2019: $955,420.** This is funding that combines Tribal General Assistance Program (GAP), Wetlands, & Clean Water Act sections 106 & 319 funding for operation of the CTSI’s environmental programs. These programs involve community engagement efforts including public meetings, presentations, and workshops specific to the program(s). These programs are guided by CTSI Tribal Council and managed by CTSI’s NR Department. Financial & program reporting has been completed & accepted by EPA.

**Department of Energy – Bonneville Power Administration (BPA) Wildlife:** $131,911. Funding from BPA that covers CTSI costs for participation in the Willamette Wildlife Mitigation Program, which seeks to acquire, enhance, & protect wildlife habitat as mitigation for impacts from construction of Willamette basin dams. This program works to transition properties into conservation lands. CTSI can draw on this experience to develop the reuse plan for the Site.

**Salmon Recovery:** $90,000. This is funding from the Wild Salmon Center for fisheries habitat enhancement work in Little Rock Creek near the CTSI’s Lhuuke Illahee fish hatchery. Salmon recovery is a significant issue on the Oregon Coast and CTSI is a leader in this effort to restore salmon populations through habitat restoration and best management practices. CTSI will utilize their connections with salmon recovery efforts to guide Site reuse.

4.b.ii.(2) Compliance with Grant Requirements:

CTSI manages over 100 federal grants across many of its programs; a small selection of those grants applicable to the Toledo Mill Site are highlighted above. For all CTSI grants, financial & program reporting has been completed & deemed acceptable by the agency or organization administering funding.
Confederated Tribes of Siletz Indians
FY2023 US EPA Brownfield Multipurpose Grant Application

Threshold Criteria Responses
Threshold Criteria FY23 EPA Brownfield Multipurpose Grant

1. **Applicant Eligibility**

The applicant, the Confederated Tribes of Siletz Indians ("Applicant," "Tribe," or "CTSI"), is a federally recognized Indian tribe and is eligible to receive this grant.

2. **Community Involvement**

Community engagement specific to this grant began in earnest when CTSI participated as a Coalition Member for OCWCOG’s Brownfield Program. In a virtual public meeting on March 28, 2022, CTSI presented their work on the Site through OCWCOG’s brownfield program & hosted a group of local officials to tour the Site. Since that time CTSI & STBC have shared the plan to apply for an EPA Brownfield Grant to continue their brownfield assessment & cleanup work at several public meetings & forums; this includes the STBC CEO speaking on a panel about the Property & EPA’s brownfield program at the Oregon Brownfields & Infrastructure Summit in October 2022.

CTSI will host at least five additional grant-related public events during the 5-year grant term to inform the public & solicit input on the project. The events will be held at key milestones which may include when news of the grant award is received, during reuse planning stages (Task 3) & during cleanup (Task 4). CTSI can hold public meetings virtually or in person depending on interest & content. CTSI can also record presentations for posting on CTSI & partner websites. CTSI will prepare Site signage for display during the project to inform the public about the activity & noting that it was funded by an EPA Brownfield Grant.

3. **Target Area:**

Toledo, Oregon – location of the 80-acre former Toledo Mill Property – is the Target Area for this grant. Cleanup and reuse of the former wood treating mill will have a significant impact on the residents, businesses, economy, and overall health of the Target Area.

4. **Affirm Brownfield Site Ownership:**

The Tribe purchased the Toledo Mill Property (Site) — the focus of the Multipurpose Grant Application — in 1995 and is the current owner. The Site meets the CERCLA § 101(39) definition of a brownfield and is: a) not listed (or proposed for listing) on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.
5. **Use of Grant Funds:**

Pages 8 through 12 of the grant narrative contains information on the plan to conduct assessment and cleanup using grant funds. An overall master plan for the Site has been developed as described on pages 2 through 4 of the grant narrative.

More specifically EPA grant funded activities will include the following:

- A Phase II environmental site assessment will be completed on the Site as described on Pages 9 and 11 of the Narrative.
- Remediation (cleanup) is planned for the Site as described on Pages 10 and 11 of the Narrative.
- A plan for revitalization of the Site and Target Area has been conceptualized with a Master Plan. Additional reuse planning activities will be conducted as described on Pages 9 through 11 of the Narrative.

6. **Expenditure of Existing Grant Funds:**

CTSI does not have an open EPA Brownfields Multipurpose Grant or Assessment Grant.

7. **Contractors and Named Subrecipients:**

Not Applicable. A contractor has not been procured to implement this grant and no subrecipients have been named for this grant.