



Port of Skagit

December 22, 2016

Environmental Protection Agency Region 10
 Attn: Susan Morales
 1200 Sixth Ave, Suite 900
 Seattle, WA 98101

RE: Port of Skagit - US EPA Brownfield Assessment Grant Application

Dear Ms. Morales:

The Port of Skagit is working with our partners on a brownfield cleanup and redevelopment project that has potential to dramatically improve the economy and environment in our small community and in developing countries around the world. We are applying for a Site-Specific Brownfield Assessment Grant to support efforts to revitalize the former Northern State Hospital campus in the City of Sedro-Woolley, Washington. This hospital served as one of the biggest employers in the area from 1912-1973, and its closure has left a gaping hole in the local economy. The property is impacted by metals and solvents in soil and groundwater that constrain the ability to redevelop the site.

Over the last three years, the Port has formed a strong partnership with the City of Sedro-Woolley and Skagit County to redevelop the property. Through an extensive community involvement effort, we have created a consensus redevelopment vision to transform the property into a technology innovation and research campus that promotes economic opportunities and education while protecting the historic and natural resources of the property. This vision has been articulated in a Subarea Plan that was unanimously adopted by the City Council in December 2015. Through the planning process an emerging local company, Janicki Bioenergy has stepped up to negotiate a lease on the property to establish their headquarters. This company has developed a technology that processes raw sewage to create clean drinking water and electricity. The Omniprocessor has garnered support from the Bill and Melinda Gates Foundation, orders from around the world, and viral YouTube videos of Bill Gates drinking the water.

Since the Port's previous Brownfield Assessment Grant Application in 2015 much has been accomplished to further adaptive reuse of this property, including but not limited to the Washington State Legislature's granting of authority to the Director of Enterprise Services to transfer the property to the Port; the Port and Enterprise Services are working to finalize an agreement by which the transfer would occur in the future.

This brownfield redevelopment project has the potential to have tremendous positive impact on our community that has been hard hit by the loss of over 400 jobs at the hospital in addition to the significant job losses related to the decline of the timber industry.

A. Applicant Identification

Port of Skagit
15400 Airport Dr.
Burlington, WA 98233

B. Funding Requested

- i. Grant Type: Assessment
- ii. Assessment Type: Site-Specific
- iii. Federal Funds Requested: \$195,000. The applicant will ***not*** be requesting a waiver of the funding limit for this grant type
- iv. Contamination: Hazardous Substances

C. Location: City of Sedro-Woolley, Skagit County, Washington State

D. Property Information:

Site Name: Former Northern State Hospital
Address: 1890 Hub Drive, Sedro-Woolley, Washington 98284 (formerly 24909 Hub Drive)

E. Contacts

- i. Project Director: Heather Rogerson, 360-757-9828, heatherr@portofskagit.com, 15400 Airport Drive Burlington, WA 98233
- ii. Chief Executive: Patsy Martin, 360-757-0011, patsym@portofskagit.com, 15400 Airport Drive Burlington, WA 98233

F. Population (data from 2010 Census)

- i. Port of Skagit (Roughly equal to population of Skagit County, subtracting the City of Anacortes and some rural areas): About 100,000
- ii. City of Sedro Woolley: 10,540
- iii. Skagit County is not listed as a county of “persistent poverty.”

G. Regional Priorities Form / Other Factors Checklist: Attached

H. Letter from the State Environmental Authority: Attached

Sincerely,



Patricia H. Botsford-Martin
Executive Director

This proposal has been updated and refined based on feedback from US EPA staff on submittal for FY2016 funding cycle.

1. Community Need

a. Target Area and Brownfields

i. Community and Target Area Descriptions

The City of Sedro-Woolley is located in Skagit County, Washington, about 60 miles north of Seattle and has a population of approximately 10,600. The City of Sedro-Woolley was incorporated in 1898 and initially hosted two major industries: logging and coal mining. But for much of the 20th century, the most significant employer in the area was the Northern State Hospital, a 225-acre mental health facility. The construction of the hospital began in 1912 with a campus plan designed by the renowned Olmsted Brothers landscape architecture firm that also designed Central Park in New York. The hospital campus includes over 600,000 square feet of existing buildings, laid out in a formal pattern oriented to capitalize on views of the Cascade Mountains. The buildings were uniformly designed in Spanish colonial style with red clay tile roofs and stucco walls. The hospital was designed to be a self-sufficient community with medical wards, residential halls, a power plant, rail spur and depot, maintenance facilities, a landfill, and approximately 700 acres of adjacent farmland to grow food for the patients. At its peak, the hospital served over 2,200 patients and employed over 400 staff, making it one of the largest employers in Skagit County. It closed in 1973 due to funding cuts, and in conjunction with a declining natural resource economy, has left a hole in the target area's economy.

Reclaiming this property to catalyze community and economic development will require public and private investment to address legacy environmental impacts, rehabilitate the historic buildings and create new employment opportunities. The Port of Skagit, in partnership with the City of Sedro-Woolley, and Skagit County is leading the effort to transform this blighted, contaminated property into a center for innovation and technology. The Port of Skagit is a special purpose district created by the voters of Skagit County in 1964 as an economic development agency to support jobs throughout the county. The planning and community engagement effort began three years ago. A re-use vision has been established, a new anchor tenant has been identified, but concerns over legacy environmental impacts present a major barrier to redevelopment. The Port of Skagit is the applicant for this grant, and the target community that is most impacted by the former hospital is the City of Sedro-Woolley and the surrounding area.

ii. Demographic Information and Indicators of Need

The City of Sedro-Woolley and the target community have struggled with structural economic challenges with the decline of the resource extraction industries and closure of the hospital. Demographic data indicate that the community has a high unemployment rate and high poverty rate (see Table 1). Median household income and per capita income are low for Washington State, even though these numbers are skewed upward by an outlier census tract in the target community. Relative to the rest of the state and nation, the target community has a remarkably high number of high school dropouts and only about half as many college graduates.

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Table 1: Community and Income Demographics	Total for Census Tracts	City of Sedro-Woolley, WA	Skagit County, WA	Washington State	United States
Population	17,719 ⁴	10,815 ³	121,846 ³	7,170,351 ³	321,418,820 ³
Unemployment	6.0% ⁴	7.7% ⁴	5.3% ⁴	5.6% ⁴	5.0% ²
Poverty Rate	18.0%	20.1% ³	15.7% ³	13.6% ⁴	15.6% ⁴
Percent Minority	11.5% ⁴	13.1% ⁴	13.2% ⁴	28.7% ⁴	37.2% ⁴
Median Household Income	\$53,392 ⁴	\$44,014 ³	\$54,917 ³	\$60,294 ⁴	\$53,482 ⁴
Per Capita Income	\$24,458 ⁴	\$22,127 ³	\$27,598 ⁴	\$31,233 ⁴	\$28,555 ⁴
Percent Youth (Under 18 years)	22.7% ⁴	26.6% ⁴	23.0% ⁴	23.1% ⁴	23.5% ⁴
Percent Elderly (65+ years)	14.3% ⁴	15.5% ⁴	17.4% ⁴	13.2% ⁴	13.8% ⁴
Education					
Not high school graduate, not enrolled, age 16-19 (dropped out)	12.3% ⁵	13.5% ⁵	9.1% ⁴	4.5% ⁴	4.6% ⁴
Bachelor's degree or more	15.7% ⁴	13.7% ³	24.5% ³	32.3% ³	29.3% ³
<small>Data are from the U.S. Census American Community Survey (ACS) 5-Year Estimates unless otherwise designated. Censuses are available on American FactFinder at http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml. 1. Data are from Washington State Employment Security Department for October 2015 and are available at https://fortress.wa.gov/esd/employmentdata/home 2. Data are from the Bureau of Labor Statistics and are available at www.bls.gov 3, 4, 5. Data are from the 2015, 2014, and 2013 ACS, respectively.</small>					

iii. Brownfields and Their Impacts

Brownfields-The primary purpose of this grant application is to define the extent of contamination and plan for cleanup of the former hospital. As a community built on the timber industry and coal mining, Sedro-Woolley is impacted by a disproportionate number of brownfield properties. There are 20 known contaminated sites in this small town based on the Washington State’s Department of Ecology list of confirmed and suspected contaminated sites. The state’s list of contaminated sites is based on reported releases and is considered an underestimate of the true number of contaminated site in the community. The following table lists some of the more notable brownfields in the target community. These brownfield properties are generally located in the center of town, so are located adjacent to existing businesses and residences.

Site	Historical/Current Use	Potential/Known Contaminants
Former Northern State Hospital <i>(Focus property for Site Specific Assessment Grant)</i>	Historically operated as a mental health hospital with medical wards and supporting facilities including power plant, landfill, and maintenance shops. Currently 60% of buildings occupied and condition is in decline.	Lead, arsenic and other heavy metals in soil and groundwater. Chlorinated solvents in groundwater. Petroleum impacts to soil and groundwater.
Former Lumber Mills	There are 2 former lumber mills in the City that used heavy machinery, refuse burners, and fuel storage tanks. Properties are currently vacant. Located adjacent to City's high school.	Confirmed releases from leaking underground storage tanks. Suspected releases of hazardous substances from operations including metals, dioxin, petroleum products.
Skagit Steel and Iron Works	Historically a large manufacturing facility that produced equipment for the logging industry and for the military during World War I and II	Metals, petroleum products, and PCBs are suspected to be on site.
Automotive repair and gas station sites	There are 8 automotive repair and scrap yards and 5 gas stations with confirmed releases of hazardous substances in the target community. Some are still active and some are closed.	Known metals and petroleum contaminants in both soil and groundwater.

Impacts-The presence of brownfield properties creates public health, welfare, and environmental quality impacts in the targeted community. The public health impacts of these brownfields have direct impacts on this community; sensitive populations such as youth walking through and past these properties on a daily basis that bear the risk of exposure to hazardous substances. While there is limited data to quantify health and welfare impacts specifically in the City of Sedro-Woolley, the ramifications of the economic decline and prevalence of brownfields are reflected county-wide. Local health indicators are shown in Table 3.

The former hospital property poses particular risks to sensitive populations including disadvantaged youth and people struggling with chemical dependency and mental health issues. The former hospital property currently hosts a Job Corps program, a chemical dependency facility, and a mental health evaluation and treatment center. While the Job Corps program provides a unique technical education opportunity for these youth, they also may be at risk to exposure to direct contact with contaminated soil and inhalation of dust. The chemical dependency facility is an involuntary 140 bed facility that provides services to people who have been mandated by a court to receive treatment. While patients at these facilities live on the campus struggling to control their substance abuse and mental health issues, they also may be at risk of exposure to direct contact with soil contamination and petroleum vapor intrusion while on the property. With their reservation located adjacent to the hospital property and with salmon in the streams running through the property, members of the Upper Skagit Tribe have potential exposure risks as well through inhalation of dust and consumption of fish.

The former hospital property also impacts **US EPA Region X priorities: water quality and threatened and endangered species**. Three streams run through the property, each of which provide habitat to salmon, including Endangered Species Act listed **Chinook salmon and steelhead**. Hansen Creek, the largest stream running through the facility is on the **Clean Water Act 303d impaired waters list** for fish habitat, temperature, dissolved oxygen, and fecal coliform. Preliminary environmental assessment of the former hospital indicates that metals contamination

in groundwater may be impacting water quality in Hansen Creek. Degraded water quality and loss of habitat are primary factors limiting the recovery of Chinook salmon and steelhead populations.

b. Welfare, Environmental, and Public Health Impacts

i. Welfare Impacts

Brownfields at the Northern State Campus pose negative welfare impacts on the area. As described in Table 2, these properties contain contaminants that would be harmful to nearby residents, passers-by, and inhabitants of the facilities. Run-down buildings and other dilapidated aspects of the property create blight and safety concerns. The lack of local job opportunities leads to longer commutes to find work and the pollution associated with higher automobile use.

ii. Cumulative Environmental Issues

Concentration of Industrial Sites: Sedro-Woolley developed as a heavy industry town to support the logging industry. In addition to the large former timber mills and steel and iron manufacturing plant, there are a number of heavy manufacturing operations in the City including aerospace components manufacturers, boat manufactures, a modular office manufacturer, and auto salvage yards. There are 52 Toxics Release Inventory facilities in Sedro-Woolley indicating the scale of industrial environmental impacts in this town of approximately 10,000 people.

Congestion of State Highway 20: A major state highway, State Route 20, runs directly through Sedro-Woolley. It connects the larger cities on Interstate 5 with the Cascade Mountains and east side of the state. State Route 20 is chronically congested and loaded with traffic up to and often exceeding its design capacity. The traffic on the highway subjects residents of the community to air pollution impacts. The constraints of brownfield properties limiting infill development within City boundaries, contributes to residents being forced to work farther away, exacerbating congesting on this highway. Commute times for City residents are nearly 30% higher than county, state, and national averages which contributes to increased greenhouse gas emissions.

Environmental Justice: The presence of these brownfields is putting unfair burden on the people with lower income and less education who are concentrated in the target community. The planned redevelopment of these areas would allow these jurisdictions to maximize opportunities for this relatively impoverished and unemployed group. In the shorter term, these cleanups would also reduce health impacts on nearby health and educational facilities, discussed in more detail below.

iii. Cumulative Public Health Impacts

This presence of these brownfields has negative impacts on public health. They pose a risk of exposure to hazardous substances for community members, including Native Americans and the campus' current inhabitants, especially the at-risk youth and people receiving mental health and

Table 3: Health Data	County	State	USA
Overweight (2011-2013)	37%	35%	36%
Asthma (2011-2013)	15%	10%-	13%
High Cholesterol (2011-2013)	43%	38%	32%
High Blood Pressure (2011-2013)	31%	30%	29%
Based on Skagit County Quality of Life Survey, Washington State Department of Health Statistics and Center for Disease Control statistics,			

chemical dependency treatment currently inhabiting the site. For example, there is currently a risk of exposure to toxic and carcinogenic substances that have been identified in soil and groundwater on the property. The primary traditional food of Native Americans in the Northwest is salmon. The

ability of tribal members to fish is limited by water quality and habitat impacts from brownfield properties like the former hospital.

Brownfield properties, including the former hospital, contribute to these public health outcomes by perpetuating the cycle of poverty associated with limited economic opportunities. Public health indicators show that people in Skagit County have higher prevalence of obesity, asthma, high cholesterol and high blood pressure.

c. Financial Need

i. Economic Conditions

Port and City budgets are small and strained, leaving little to no funding for cleanup of the target area. The Port of Skagit is a relatively small governmental organization with an annual operating budget of approximately \$5.2 million. To undertake a project as significant as the cleanup and redevelopment of the former hospital property will require large public and private investment beyond the resources of the Port. For example, it has been estimated that the rehabilitation of the historic buildings on the campus will cost approximately \$98 million, not including the costs of infrastructure improvements and environmental cleanup.

The limited ability for local governments to fund this project is underscored by the financial conditions of the City of Sedro-Woolley, which is also indicative of the economy of the target community. The City's budget declined and then remained essentially flat since the Great Recession. To cover the increasing costs of providing public services, the City has reduced staff, deferred salary increases, and spent down all of their available reserve funds.

Washington State has a dedicated funding source to assist local governments in cleaning up brownfield properties. However, that fund is based on an *ad valorem* tax on hazardous substances in the state. Approximately 96% percent of the tax revenues are derived from petroleum products. With the drop in oil prices globally from over \$100 per barrel to \$40 per barrel, the Washington grant fund has shriveled. With the forecasted continued low oil price, there is greater competition for a smaller amount of funding.

ii. Economic Effects of Brownfields

Brownfield properties have had broad negative economic effects in Sedro-Woolley through decreased property values and tax revenues, lost employment opportunities, and vacant, constrained property driving development outside of the City limits. From 2009 to 2016, the City of Sedro-Woolley's budget maintained a trend of cuts and decreased services commensurate with decreasing revenues and increasing costs, while the City as a whole has struggled to recover from the Great Recession. Approximately 28% of Sedro-Woolley's commercial and industrial land is vacant or underutilized¹. Many of these vacant and underutilized properties are constrained by real or perceived contamination impacts. These vacant properties produce little property tax revenue and no business or sales tax revenue. The local government's ability to provide public services such as police and fire are constrained by the decreasing tax revenue. The costs and risks associated with redeveloping these properties creates pressure to develop outside of the City on greenfield sites, creating urban sprawl and the associated negative impacts of increased traffic, habitat degradation, and increased costs of providing infrastructure and public services.

Brownfields are closely linked to the high unemployment rate and loss of jobs in the targeted community. The former hospital was the largest employer in the county with over 400 jobs when it closed in 1973. The Skagit Steel and Iron Works employed over 800 people at its peak. The lumber mills also provided hundreds of jobs.

A proposed technology and innovation center for this property has the potential to build on the existing local engineering and manufacturing expertise of Sedro-Woolley and positions the community to transition from the declining natural resource extraction basis of its past to a future with great economic growth opportunities. However, the ability to recover from these job losses is impeded by the uncertainty, risk and costs associated with cleanup of brownfield properties. A thorough brownfield assessment could significantly decrease uncertainty, position the property to be developed by these potential users, and bring jobs to the community.

2. Project Description and Feasibility of Success

a. Project Description, Timing, and Implementation

i. Project Description and Alignment with Revitalization Plans.

The Port of Skagit will use the US EPA brownfield grant to conduct environmental site assessment (ESA) and cleanup planning at the former hospital to position the property for redevelopment.

¹ 2015. Sedro-Woolley Buildable Land and Land Capacity Analysis Report.

Initial studies have identified contamination in several areas. The ESA will define the extent of contamination to inform plans for cleanup.

The vision for the future of the property is to create a technology innovation campus that incorporates research, high tech manufacturing, education, and recreational uses within the character of the historic Olmsted design. This vision has emerged through community engagement and land use planning led by the Port in partnership with the City of Sedro-Woolley and Skagit County over the past three years. Through the planning process the community expressed strong support for increased employment on the property, increased public access, and protection of the historic character. The Port is leasing a portion of the property and is negotiating to take over ownership and control of the entire property. The potential costs and liability associated with legacy contamination in soil and groundwater has become a major risk factor and barrier to redevelopment.

The redevelopment and reuse of the former hospital property is strongly supported by the goals and policies adopted in the City's Comprehensive Plan. This includes land use policies promoting urban infill development as well as economic policies supporting local businesses and manufacturing jobs.

To ensure that redevelopment of the property aligns with community aspirations and City development regulations, the Port, City, and County have jointly prepared a Subarea Plan for the property, which has been adopted into the City's Comprehensive Plan. An Environmental Impact Statement (EIS) was conducted as part of the review process for the Subarea Plan. The coordinated Subarea Plan and EIS planning process began with a large public open house meeting that was followed by three formal public hearings, at least ten public meetings, and multiple direct mailings to over 350 parties. The Subarea Plan gained tremendous public support as a sustainable framework for redevelopment that promotes private investment, protects the historic character of the facility, and protects natural resources. The Subarea Plan was adopted on December 9, 2015 as an amendment to the City's Comprehensive Plan. The Washington State Chapter of the American Planning Association gave the City, County and Port an award for the Subarea Plan as the best example of small community planning in the state.

Integrating Equitable Development or Livability Principles. The plans for redevelopment of the former hospital property align well with the Housing and Urban Development-U.S. Department of Transportation-USEPA Partnership for Sustainable Communities livability principles.

1. *Provide more transportation choices*—The property is currently served by a regional bus on an hourly basis. As employment and development increases on the property, the local governments will facilitate discussion with local provider for increased bus service and opportunities for ride sharing. In the initial phase of development sidewalks will be extended to connect with a regional 100-mile multi-purpose trail to promote biking and walking to the campus.
2. *Promote equitable, affordable housing*—The former hospital is located within the limits of the small City of Sedro-Woolley and is proximate to residential development in the community. Providing more jobs near housing improves household finances by decreasing transportation costs. The former hospital is located adjacent to a cottage housing development which currently provides affordable housing through smaller size units with lower than typical utility costs.
3. *Enhance economic competitiveness*—Redevelopment of the former hospital property into a technology and innovation center will provide a tremendous market opportunity in a unique niche with potentially huge global demand.
4. *Support existing communities*—The proposed technology and innovation center builds on the existing local engineering and manufacturing expertise of Sedro-Woolley and positions the community to transition from the declining natural resource extraction basis of its past to a future with great growth opportunities. Over 30% of Janicki Bioenergy's workforce currently lives in Sedro-Woolley and more than 50% live in Skagit County. Providing employment opportunities for the local workforce is expected to continue as Northern State Hospital redevelops.

5. *Coordinate and leverage federal policies and investment*—The US EPA grant provides an opportunity for this project to align with federal policy and funding opportunities.
6. *Value communities and neighborhoods*—This project has been driven by the local community's desire to see a more productive use of the former hospital property. The planning process has included and will continue to include extensive community engagement and has prioritized the public's stated desire for increased employment opportunities, public access to the property, and protection of the historic buildings.

Redevelopment Strategy. An exciting redevelopment strategy has emerged out of the public planning process. A local company, Janicki Bioenergy has approached the Port to use the property as the headquarters and research and development center for innovative technologies to address third world sanitation needs. This development will renovate existing historic buildings for office, research and development, and boutique hotel accommodations. The redevelopment strategy is based on public-private partnership with the Port, City and County providing upgrades to existing roads, water and sewer infrastructure and Janicki Bioenergy funding building renovation and construction.

Janicki Bioenergy has developed the Omniprocessor, a technology that processes sewage to produce clean drinking water and electricity. Nearly 35% of the world's population lack access to improved sanitation. Too often, the dumping site for the sewage is a river, stream, or bay with no treatment. This creates a huge problem. The sewage contaminates the drinking water, causing people to get sick. The Omniprocessor has received support and funding from the Bill and Melinda Gates Foundation. The Omniprocessor can produce up to 10,800 liters of clean drinking water per day, satisfying all US drinking water standards. The prototype model is now operational in Dakar, Senegal and scaled production for the next generation model is underway. As the Port is negotiating to acquire the former hospital, they are also working with Janicki Bioenergy to locate their headquarters and research and development center at the property. The Janicki Bioenergy facilities would employ scientists, engineers, and managers, as well as skilled labor to manufacture new technologies. The first phase of the Janicki Bioenergy facility is currently in design.

ii. Timing and Implementation.

(a) *Contractor procurement.* The Port routinely contracts engineering and consulting services and has management and procurement procedures in place to acquire these services through a competitive qualifications and/or bidding evaluation process. The Port will use a qualifications-based procurement process in conformance with 40 CFR 31.36 to contract an environmental consultant to assist with project implementation. The contractor will provide technical and project management capabilities. The Port will be prepared to initiate the contracting process immediately upon execution of the Cooperative Agreement with US EPA.

(b) *(Site-specific proposal) Existing conditions of property to be assessed with this funding.* Despite state and local efforts to recruit users to the facility, the large property has been underutilized since the hospital closed. Only 60% of the buildings on the campus are currently occupied. The vacant buildings are in declining condition from lack of maintenance and vandalism. Several prominent buildings have been demolished because of their poor condition. In an effort to preserve the character of this landmark, local residents led an effort that resulted in the property being listed in 2010 on the National Register of Historic Places. The property is currently closed to public access.

(c) *Obtaining and securing site access.* The Port of Skagit entered into an access agreement with the property owner for site studies in 2014 and 2015. This agreement can be readily updated to allow access for this project. The Port and property owner are in frequent communication and negotiation over transition of the property.

b. Task Description and Budget Table

i. Task Description. The scope of work has been organized into five tasks as detailed below. For each task, the Port proposes to **leverage** the grant with a **voluntary match** (i.e. Port personnel in-kind labor contributions) to assist with eligible activities. Anticipated *outputs, outcomes* (in *italics*), and the methodology for tracking progress for these tasks is discussed in Section 5c.

Task 1—Community Involvement. This task includes: (1) coordinating and conducting at least two *community meetings* at project kickoff, to review ESA findings and cleanup alternatives, and discuss the preferred cleanup action plan; (2) implementing meaningful public input into the grant processes; (3) preparing and publishing *public notices*; (4) preparing *meeting materials and presentations*; and (5) preparing *web content and printed public information materials*. Additional details are provided in Section 3. The community outreach budget includes \$12,000 (120 hrs at \$100/hr) for a consulting firm to facilitate community meetings, prepare graphics and materials, and assist the Port with outreach. Budgeted supply costs of \$1,000 includes printing costs (\$400) and public meeting display boards and other graphic materials (\$600). The budget also includes \$2,000 for Port staff time (40 hrs at \$50/hr) to coordinate community outreach activities.

Task 2—Environmental Site Assessment. This task represents the bulk of the work conducted under the grant. The Port’s environmental consultant will prepare a combined *Quality Assurance Project Plan (QAPP) / Sampling and Analysis Plan (SAP)* for US EPA review and approval, along with a *Health and Safety Plan (HASP)* (estimated at \$7,000 for both, about 60 hrs at \$120/hr). The consultant will complete the *environmental site assessment* including collection of soil, groundwater, and surface samples, laboratory analysis, data management, and preparation of a report (estimated at \$110,000) (about 950 hrs of field work, analytics, and reporting at an average of about \$115/hr). This cost is based on the assumption that over 100 soil samples are likely needed to address the extent of soil contamination across the 225-acre property. Additionally, a network of groundwater wells will be needed along with surface water samples to evaluate impacts to the salmon bearing stream. This task will also include preparing documents to meet federal requirements such as *Endangered Species Act consultation* and *National Environmental Policy Act review* (estimated at \$10,000). The Port will provide voluntary, in-kind Port staff resources at a value of \$3,000 (60 hrs at \$50/hr) to assist with coordination, report review, and distribution.

Task 3—Analysis of Brownfield Cleanup Alternatives. (ABCA) This task involves developing and evaluating potential options for addressing contamination impacts. The *ABCA* will meet USEPA and Washington State standards and requirements and will include evaluation of effectiveness, permanency, and risks associated with each alternative along with a disproportionate cost analysis. The estimated cost for an environmental consultant to prepare this analysis is \$25,000 (about 220 hrs at an average of \$115/hr). The Port will provide in-kind staff resources as voluntary match at a value of \$2,000 (40 hrs at \$50/hr) to assist with coordination, report review, and distribution.

Task 4—Cleanup Action Plan. (CAP) The purpose of this task is to prepare the *CAP* document that will memorialize the preferred cleanup action. It is expected that the Port will take this document through the regulatory process for approval by the Washington State Department of Ecology. This will set the stage for implementation of the cleanup in the future. The estimated contracting cost for this task is \$15,000 to prepare the plan and \$5,000 for coordination with the regulatory agencies (about 150 hrs at an average of \$130/hr). The Port will provide in-kind staff resources as voluntary match as a value of \$2,500 (50 hrs at \$50/hr).

Task 5—Eligible Program Activities. The budget includes Port personnel costs of \$1,000 (20 hrs at \$50/hr) for *tracking benchmarks, grant reporting, and data input to ACRES*. In addition, \$5,000 (50 hrs at \$100/hr) is budgeted for contractual costs for reporting and other eligible activities to support tasks outlined above. The budget also includes \$1,200 for project manager, Heather Rogerson to *attend the national brownfield conference or a state/regional brownfield conference*. Estimated travel costs include airfare (\$400) and hotel, meal, and incidental costs (\$200/day=\$400).

ii. Budget Table

Table: 5 Project Budget Table

*Application for USEPA Brownfields Site Specific Assessment Grant
Port of Skagit, WA—FY2017*

Budget Categories	Hazardous Substance Funds—Project Tasks					Total
	Task 1	Task 2	Task 3	Task 4	Task 5	
	<i>Community Involvement</i>	<i>Environmental Site Assessment</i>	<i>Analysis of Brownfield Cleanup Alternatives</i>	<i>Cleanup Action Plan</i>	<i>Other Eligible Activities</i>	
Personnel	\$2,000	\$0	\$0	\$0	\$2,200	\$ 4,200
Fringe Benefits	\$0	\$0	\$0	\$0		\$ 0
Travel	\$0	\$0	\$0	\$0	\$800	\$ 800
Supplies	\$1,000	\$0	\$0	\$0		\$ 1,000
Contractual	\$12,000	\$127,000	\$25,000	\$20,000	\$5,000	\$ 189,000
Total USEPA Funds	\$15,000	\$127,000	\$25,000	\$20,000	\$8,000	\$ 195,000

Note: Contractual services included on the budget table will be procured in accordance with the requirements of 40 CFR 31.36. EPA grant funds will not be used for administrative costs as defined in the Proposal Guidelines. Per the guidelines, only grant-funded activities are listed in the table. The Port's proposed voluntary match (in-kind labor) is described in the text in Section 2.b.i., but not included in the table.

c. Ability to Leverage

The EPA brownfield grant will act as an accelerator to an on-going brownfield redevelopment project that has tremendous momentum and garnered significant funding support. As shown in the table below, the partnership of the Port, City, and County have contributed their own funds and obtained multiple grants to support this project so far. The partnership contributed to design of road improvements to better serve the property and positioning for transportation grants to fund construction of those improvements. In total, the committed funding for this project is over **\$942,500**. Combined with the voluntary match pledged by the Port (i.e. Port staff in-kind labor contributions) of **\$7,500**. This represents nearly **5:1 leverage of US EPA funds**.

Funding Source	Amount	Status	Activities
WA Dept. of Ecology Integrated Planning Grant	\$200,000	Awarded 2014, Completed	Community visioning and market, building, wetlands, and environmental assessment
WA Dept. of Commerce Advanced Planning Grant	\$212,500	Awarded, March 2015, Completed	Subarea Plan: Community involvement, master planning, infrastructure analysis, policy development Environmental Impact Statement - Wetlands Delineation - Cultural Resource Study - Transportation Analysis - Economic Analysis
Port of Skagit	\$100,000	Committed Feb, 2015, Completed	
City of Sedro-Woolley	\$25,000	Committed Feb, 2015, Completed	
Skagit County	\$75,000	Committed Feb, 2015, Completed	
WA Dept. of Ecology Remedial Action Grant	\$150,000	Awarded March 2015, Completed	Preliminary environmental assessment
Port of Skagit	\$60,000	Committed Oct 2015, Underway	Design of improvements to primary access road to former Northern State Hospital, including sidewalks and gateway entrance to facility.
City of Sedro-Woolley	\$60,000	Committed Oct 2015, Underway	
Skagit County	\$60,000	Committed Oct 2015, Underway	
Total	\$942,500		

The Port is working with its partners on a strategy to fund redevelopment and cleanup actions at the property. Port is exploring many redevelopment fund sources in addition to Port and private sector contributions including State CERB, Federal EDA, and historic tax credits. Primary cleanup

funding sources are expected to include a US EPA Brownfield Cleanup Grant, private party contributions, Port funds, and Washington State Remedial Action Grants. The Port is also exploring State PLIA funding potential for petroleum cleanup. While Washington State cleanup grant funding is expected to be highly competitive in the short-term, this project is expected to rank highly. The project is shovel ready, there is potentially significant private sector investment, and the contamination impacts affect underserved populations.

3. Community Engagement and Partnership

a. Engaging the Community

i. Community Involvement Plan. The Port of Skagit and its partners are committed to continuing the robust community involvement program they began in 2014. Over 300 people in total have attended the 19 public meetings on the project to date. The community involvement effort has included informal public open house sessions where participants had opportunities to share their ideas for future uses of the property, formal public hearings, and public comment periods for the Subarea Plan and Environmental Impact Statement. It is noteworthy, that the elected bodies of the Port, City, and County government have held four joint sessions to discuss the redevelopment project. These joint sessions of the three local governments were unprecedented and underscored the importance of this project to the community and region, and the strength of the partnership among the government entities.

The Port will continue to engage the community and foster partnerships through the brownfield assessment project. Public involvement efforts will be coordinated by the Port's Community Outreach Administrator, Andrew Entrikin. The Port will use the grant to prepare a Community Involvement Plan that will employ strategies that have proven effective in reaching a broad cross section of the public including minority groups and businesses and residents in the targeted area. The plan will likely include the following elements:

- Stakeholder and Small Group Outreach—The Port will conduct personal meetings with key stakeholders, businesses, and community groups to engage them in discussions of cleanup and redevelopment of the property. The Port has found that meeting one-on-one with stakeholders such as the Upper Skagit Tribe and presenting at meetings of groups such as the Chamber of Commerce, Skagit Audubon Society, and the Wildcat Steelhead Club have been the most effective methods to engage members of this community that are typically not represented in public planning processes, such as tribal members.
- Public Open House Events—The Port will hold at least two community open houses throughout the assessment process. The meetings will be designed to share information on the environmental assessment and solicit feedback on cleanup and redevelopment options. Because of the high level of excitement in the community around this project, public meetings held over the last two years have been very well attended. Translators and information in multiple languages will be utilized as appropriate in these meetings.
- Web-based Communications—The Port is increasingly using web-based tools to engage community members. The Port currently has a dedicated web page for this project that will be updated to track the assessment project. Community members have used these internet resources as a library for information on the project.
- Local Schools—The Sedro-Woolley School District and City have initiated a Science Technology Engineering and Math (STEM) program funded by a local school levy, the City and State STEM. The Skagit STEM program, of which the Port is a partner, emphasizes opportunities for partnerships and opportunities for students to learn about real world application of science.

ii. Communicating Progress. The Port will continue to utilize communications techniques that have proven effective in the Sedro-Woolley target community. The Port will provide regular updates at public Port Commission and Sedro-Woolley City Council meetings, update their website and prepare printed materials, and present at local civic group meetings, such as the Chamber of Commerce, on a regular basis. The Port will also rely on the communications networks of their community partners including the Chamber of Commerce, Skagit Audubon, and the Northern State Task Force to provide updates and information through their websites, newsletters

and meetings. These community groups have been able to engage people who don't typically attend local government-led evening meetings. The Port will also engage with the Skagit Valley Herald, the regional daily newspaper to publish articles on progress milestones of the assessment grant. The Skagit Valley Herald is a trusted and widely read on-line and print newspaper in this region that has provided regular coverage of the redevelopment effort. The Port will update Herald reporters and work with the paper to broadly disseminate information about this project.

b. Partnership with Government Agencies

i. Local/State/Tribal Environmental Authority. The Department of Ecology is the regulatory authority that provides oversight of brownfield cleanups in Washington State and will provide oversight of the environmental assessment and redevelopment planning process through either their Voluntary Cleanup Program or formal program. The Port has developed a strong partnership with the Department of Ecology through the initial assessment work at the former Northern State Hospital and through a complex remediation project at Skagit Regional Airport. The Port will continue to coordinate with the Department of Ecology through the assessment process. All environmental assessment, analysis of cleanup alternatives and cleanup planning activities will be conducted in compliance with both US EPA standards and the Washington State's Model Toxics Control Act and its implementing regulations.

ii. Other governmental relationships. In this small community, the Port has learned to increase its capacity by developing strong partnerships with other local governments, state and federal agencies, and tribes. The following table lists the most important governmental partnerships the Port has developed and will continue to foster through the assessment and cleanup process.

Organizations—Public	Brownfields Assessment and Redevelopment Role
City of Sedro-Woolley: Land use regulatory authority and provider of public services to support the community.	Formal partner through Interlocal Agreement. Will provide information and staff resources to support assessment project. Leading infrastructure improvements to support redevelopment of property.
Skagit County: Local government agency serving citizens in the entire county. Owner and manager of adjacent 700+ acre open space park.	Formal partner through Interlocal Agreement. Will provide information and staff resources to support assessment project. Contributing funding for infrastructure improvements to support redevelopment of property. Will update master plan for adjacent park space to enhance public access to former hospital.
Upper Skagit Tribe: Reservation located northeast of the former Northern State Hospital. Strong proponent of salmon recovery and economic development initiatives in the area.	Will provide information and technical support to evaluate risks to the environment from contamination and compare options for remediation.
WA Dept. of Archaeology and Historic Preservation: technical resource, regulatory authority, and liaison for National Registry of Historic Places program.	Will provide expert advice on protecting historic and cultural resources through the cleanup and redevelopment process.
WA Dept. of Enterprise Services: property manager for state facilities including former Northern State Hospital.	Informal project partner and initiator of the Collaborative Planning Process for property. Will coordinate and provide access to property for assessment.

c. Partnerships with Community Organizations

i. Community Organization Description and Role. The Port has actively engaged community organizations to ensure that redevelopment of the former hospital property meets their needs and aligns with the public's vision for the future and provides a range of community benefits.

Table 8: Community-Based Organizations Committed to Supporting the Assessment Grant	
Organizations—Nonprofit	Brownfields Assessment and Redevelopment Role
Northern State Task Force: citizens group focused on improvements and community benefits at the former Northern State Hospital.	Will continue to participate as advisor to project, serve as liaison to the local community, and provide input and comments on plans and reports.
Economic Development Association of Skagit County: provides resources to support and recruit businesses in Skagit County.	Will continue to provide expert advice and promotional services to support business recruitment and redevelopment of the property.
Skagit Audubon Society: membership group focused on protecting and restoring wildlife habitat with an emphasis on birds.	Will continue to share data and information they have collected, participate in advisory group meetings, and provide review and comment on reports and plans to ensure they are protective of birds and wildlife.
Sedro-Woolley Chamber of Commerce: partners with the community to promote business and economic development.	Will continue to distribute information to their members, provide advice on redevelopment strategy, and participate in public meetings and committees

ii. Letters of Commitment.

Letters of commitment from community organizations are attached.

d. Partnerships with Workforce Development Programs

The Port and its partners are committed to linking community members to employment opportunities and will promote local hiring throughout the brownfield assessment project and in the future redevelopment of the hospital campus. The Port and its partners have already begun to reach out to the Job Corps education and job training program at the property and the local community college to explore opportunities for internships, mentorship, and shared programs. The Port will also reach out to the EPA-funded workforce development program in Tacoma, Washington to explore similar opportunities. The prime private business poised to locate at the facility Janicki Bioenergy is owned by a family that has lived in Sedro-Woolley for three generations and is deeply committed sustaining employment in this community.

4. Project Benefits

a. Welfare, Environmental, and Public Health Benefits

Public Health and Welfare Benefits. Assessment and cleanup of the former hospital property will have a significant impact on public health and welfare in the target community including members of the Upper Skagit Tribe. The at-risk youth and people receiving mental health and chemical dependency treatment will directly benefit from cleanup of the contamination on the property where they reside to take part of these programs. These programs will continue to operate as redevelopment of the property begins. The Port is exploring opportunities for the Job Corps program to collaborate with Janicki Bioenergy for training and employment. Skagit County is working with partners to develop a more effective model for delivering combined mental health and chemical dependency treatment. These programs will continue to operate at the property until a more effective facility is developed. Cleanup of the property will remove their risk of exposure to toxic and carcinogenic substances that have been identified in soil and groundwater on the property.

Redevelopment plans for the property will open the property for public access with recreational trails connecting to the adjacent 700-acre county park. This will provide greater opportunities for community members to get outside and exercise which has the potential to help reduce obesity, high cholesterol, and high blood pressure issues.

The increased employment opportunities on the property will also have broad health and welfare benefits. By promoting employment opportunities close to residences, the percentage of commuters, and the distance they travel to work is expected to reduce which will reduce household costs for transportation and limit greenhouse gas emissions from vehicles. The technology and

innovation center is expected to include education opportunities and be a tremendous inspiration for community members to finish high school, receive technical training and/or advanced degrees to work on exciting public health technologies being designed and manufactured at the campus.

Beyond the target community, this project has potential to have global implications for public health and welfare. The sanitation technologies, such as the Omniprocessor, that will be developed and manufactured at the property will help improve water quality in developing nations. The World Health Organization estimates that approximately 2 million deaths per year are attributable to unsafe water, sanitation, and hygiene.

Environmental Benefits. Cleanup and redevelopment of the former hospital will provide environmental benefits through reduction of hazardous substances, protection of open space, and **improvement of water quality and stream habitat to Endangered Species Act listed species.** Assessment of the property will lead to a cleanup action plan to address contaminants in soil and groundwater. The Subarea Plan adopted by the City of Sedro-Woolley also sets aside approximately **100 acres** of the property as open space. The open space area includes wetlands, streams, meadows, and forested areas. Redevelopment of the property will also improve stormwater management and water quality in the streams running through the facility. The Subarea Plan directs new construction and building renovation into the general footprint of existing development. Permitting of new construction will require significant upgrades to comply with current stormwater management regulations. The City of Sedro-Woolley has updated their stormwater management regulations to require the use of **Low Impact Development** techniques which will decrease stormwater runoff impacts. These actions will improve water quality and habitat for the salmon bearing streams on the property.

b. Economic and Community Benefits

Improved Local Economy—Redevelopment of the former hospital property will be a catalyst for economic development in the targeted community and the region. The proposed technology and innovation center will create both professional jobs in engineering, design, and management as well as skilled labor jobs in welding and manufacturing. Based on the profile of existing high tech manufacturing in the area, it is expected that 30% of employees will be based in Sedro-Woolley and the remaining employees will live in Skagit and neighboring Whatcom County. An economic impact analysis of the Subarea Plan forecasts that full build out of the property over 20 years will include a total of 950,000 square feet of rehabilitated historic structures and new buildings. This development would support **2,850 direct jobs** and **4,390 indirect jobs**. The increased value and private investment is forecasted to generate **\$33 million in property taxes** that benefit local and state government. This increase in local tax revenue would alleviate strain on the City budget.

Improved access to green, open, and social spaces—The Subarea Plan sets aside approximately **100 acres** of the property as open space to protect wetlands and streams and promote public recreation. Redevelopment of the former hospital will include creating trails and paths connecting with the adjacent 700-acre county park. Opening the campus to the public will provide an opportunity for historical interpretation as well as outdoor exercise.

5. Programmatic Capability and Past Performance

a. Audit Findings

The Port of Skagit has not had any adverse audit findings in the last 16 years.

b. Programmatic Capability

Organizational Structure: The Port effectively manages a portfolio of approximately 2,000 acres of land that is managed to provide good jobs and environmental stewardship. Port property supports over 85 tenants employing approximately 1,288 workers. The Port has selected a highly-qualified team of staff with the skills, experience, and energy to lead the assessment, cleanup, and redevelopment of the former Northern State Hospital. The Port has years of finance and project management experience related to grants, as shown below.

Heather Rogerson, Planning and Environmental Project Administrator, will manage the grant. She has been the manager for the previous environmental assessment efforts at Northern State as well as the on-going redevelopment planning and transaction negotiations. She leads the Port's most complicated and demanding projects, including managing over \$15 million in federal

Department of Transportation grants for a major airport runway improvement. Heather holds a Juris Doctor (J. D.) which brings a depth of legal understanding to her management of projects.

Patsy Martin, Executive Director, provides leadership and strategic guidance to the project. Patsy joined the Port of Skagit in 1995. As the Executive Director, she is ultimately responsible for implementing Port’s strategic plan and policies and resolutions adopted by the elected Port Commission. Patsy has been the lead in forming and sustaining the interlocal partnership with Skagit County and the City of Sedro-Woolley. Patsy also serves as the chair of the Washington Public Ports Association Environment Committee.

Sara Young, Director of Planning and Facilities, has managed the approximately \$3 million remediation of contamination at the Port’s airport. She will bring experience and technical expertise from that large scale cleanup project to the Northern State project. Sara is responsible for the organization, administration, operation, and customer relations related to the Port’s marine terminals, airport and for directing all facilities maintenance related activities for the Port. She is also responsible for marina and facilities budgets, plans, projects, emergency services, consulting and contract services, and directing day-to-day operations.

Andrew Entrikin, Community Outreach Administrator, leads the port’s internal and external communications, public relations, and operation of the port’s web site and social media. He also administers the port’s fiber optics system. Andrew holds a Bachelor’s Degree in English/Political Science from Western Washington University and is finalizing his Master of Arts in Communication studies from Gonzaga University.

Greg Thramer, Finance Director, is responsible for management of the Port’s overall finance functions. He serves as the port auditor, advises the elected port commission and executive director, administers Port fiscal matters, and supervises the Port’s accounting and administrative staff. Greg holds a Bachelor of Arts degree in Accounting and Business from Western Washington University and is a licensed CPA.

Nancy Gardener, Senior Accountant, coordinates and performs accounting and finance functions for accounts payable, payroll, accounts receivable, cash management, general ledger, and budgets. She also prepares internal and external financial reports.

c. Measuring Environmental Results: Anticipated Outputs and Outcomes

Task	Methods of Tracking and Measuring Progress
1 Community Involvement	Outputs—Fact sheets, project website, number of community meetings Outcomes—Informed and engaged community Tracking Methods—Recording and reporting community outreach elements / products (such as fliers and updates to project website); number of meetings and sign-in sheets to measure attendees
2 Environmental Site Assessment	Outputs—QAPP, HASP, and Environmental Site Assessment Report including data tables and figures Outcomes—A more complete knowledge of environmental conditions Tracking Methods—Schedule, budget, report deliverable
3 Analysis of Brownfield Cleanup Alternatives	Outputs—Evaluation of cleanup options and costs Outcome—Clear understanding of cleanup costs and preferred option Tracking Methods—Schedule, budget, report deliverable
4 Cleanup Action Plan	Outputs—Cleanup Action Plan Outcomes—Well-defined project that meets regulatory requirements and enables accurate cost estimating, accelerated cleanup of contaminated site Tracking Methods—Set dates for deliverables, document achievement of deadlines, and provide EPA with copies of deliverables

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d. Past Performance and Accomplishments

ii. Has not received an EPA brownfield grant, but has received other federal or non-federal assistance agreements

The Port of Skagit has not received an EPA brownfield grant, but has received substantial federal Department of Transportation Airport Improvement Program (AIP) funding over the last 5 years for a multi-phase / multi-year project to improve Runway 11-29 (formerly Runway 10/28) at Skagit Regional Airport to meet Federal Aviation Administration standards for Category D-II aircraft. In addition, the Port received funding for a Taxiway and Apron rehabilitation project in 2016. The table below outlines those grant agreements.

Grant # / Year Awarded	Grant Amount	Grant / Project Purpose and Accomplishments (1)	Grant Compliance (2)
AIP 3-53-0010-017 2010	AIP: \$3,033,754 Port Match: \$159,671	Runway 10/28 Overlay and Underdrain Improvements. Improvement of the Runway 10/28 and all bordering taxiways and shoulders. Construction completed August 2011 and grant closed April 2013.	Completed within budget and on schedule. No audit findings.
AIP 3-53-0010-018 2011	AIP: \$300,000 Port Match: \$15,790	Design of Runway 10/28 Rehabilitation. Design of improvements described below. Design completed and grant closed January 2013.	Completed within budget and on schedule. No audit findings.
AIP 3-53-0010-019 2011	AIP: \$9,419,840 Port Match: \$551,112	Design and Construction of Runway 10/28 Rehabilitation. Work on Runway 4-22 was also conducted. Project consisted of the following work elements: runway grading, underdrain system improvement, relocate Runway 4-22 thresholds, extend taxiway, and install wildlife exclusion fencing. Construction was substantially complete October 2012. Grant was closed August 2014.	Completed within budget and on schedule. No audit findings.
AIP 3-53-0010-020 2012	AIP: \$1,062,818 Port Match: \$118,091	Conduct Environmental Assessment for Improvements to Runway 11 Safety Area. Included completion of an environmental assessment and to obtain Corps of Engineers Section 404 permit and Ecology 401 certification for fill and grading in the safety area, and purchase of wetland mitigation bank credits in 2015. Grant was closed July 2015.	Completed within budget and on schedule. No audit findings.
AIP 3-53-0010-021 & 22 2014&2015	AIP: \$1,558,659 \$887,000 Port Match: \$173,184 \$98,556	Design and Construction of Improve Runway 11 Safety Area Grading. Project consists of the following elements of work: Runway 11 Safety Area and Object Free Area Grading, storm drainage improvements, hydroseeding and removal of fencing and replacement with wildlife exclusion fencing. Substantially complete 2016.	Project will be subject to single audit to be performed in 2017, no findings anticipated.
AIP 3-53-0010-023 2016	AIP: \$368,757 Port Match: \$67,421	Taxiway A and CAC Apron rehabilitation project. Includes pavement repair, crack and slurry seal. Construction began Fall 2016 and will be completed in 2017.	Project will be subject to single audit in 2017, no findings anticipated
(1) Purpose and Accomplishments.		(2) Compliance with Grant Requirements	

Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: Port of Skagit

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

- Protect / Enhance Water

- Threatened and Endangered Species

Page Number(s): 3 and 4

Assessment Other Factors Checklist

Please identify (with an **X**) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	<i>None of the Other Factors are applicable.</i>	
	Community population is 10,000 or less.	
	Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
	Target brownfield sites are impacted by mine-scarred land.	
X	Project is primarily focusing on Phase II assessments.	8
X	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	9
	Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic	

<p>Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.</p>	
<p>Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.</p>	
<p>Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.</p>	