

**ECONOMIC & COMMUNITY DEVELOPMENT DEPARTMENT**

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Ms. Susan Morales
 U.S. EPA Region 10
 1200 Sixth Avenue, Suite 900, Mailstop ECL-112
 Seattle, WA 98101

November 28, 2011

RE: Application by City of Kent, Washington for a U.S. EPA Fiscal Year 2012 Community-Wide Assessment Grant for Hazardous Substance Brownfields

Dear Ms. Morales:

The City of Kent, Washington is pleased to submit the enclosed application to the United States Environmental Protection Agency (U.S. EPA) for a **Community-Wide Assessment Grant for Hazardous Substance Brownfields** as part of the U.S. EPA Fiscal Year 2012 Brownfield Grant Competition. **Funding is requested in the amount of \$200,000. Funding will be used during a project period of three (3) years to inventory and assess brownfield properties located throughout the City, which has a population of 118,200 in 2011. Contact information for the highest ranking elected official and the project director is provided below.**

| | | |
|-----------------------|---|---|
| Name and Title | Suzette Cook Mayer | Ben Wolters (Project Director) Economic & Community Development Director |
| Organization | City of Kent | |
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The City of Kent and its residents have been significantly impacted by brownfields. Although a formal inventory of brownfield sites in the City has not been completed to date, a review of environmental databases maintained by the Washington State Department of Ecology (Ecology) document the presence in the City in November 2011 of 1,047 potentially impacted sites, including 582 hazardous waste generators, 294 underground storage tank (UST) sites, 136 leaking UST (LUST) sites, and three CERCLIS (Superfund) sites. The brownfield sites range in size from 0.5-acres or smaller drycleaner sites, to the to the 110-acre Kent Highlands Landfill. The City of Kent has literally been the dumping ground for the City of Seattle 15 miles to the north, with both the Midway and Kent Highlands Landfill sites (and Superfund sites) having been owned and operated by the City of Seattle/Seattle Public Utilities (SPU) and the final resting place for an estimated 11 million cubic yards of municipal, industrial, and other waste materials.

The City of Kent has one of the largest concentrations of industrial sites in the Pacific Northwest, with products produced in the Industrial Valley (including lands from adjacent Tukwila and Renton) responsible for an estimated 12% of the total State of Washington GDP. These industries included businesses such as Western Processing and Salmon Bay Steel that released enormous quantities of toxic

substances into the air, soil, groundwater and/or surface water. The impact of these releases on area residents, in particular from long term inhalation of air pollutants or from exposure to contamination released through atmospheric deposition of air pollutants onto area soil, community gardens, outdoor playground equipment, is undetermined. This impact is exacerbated as a result of the location of many of the lowest income neighborhoods in close proximity to these industrial areas [for example, eight (8) of the City's 18 mobile home parks are located immediately adjacent to industrial areas].

The City has been significantly involved in several recent brownfields redevelopment projects that used City, State of Washington, and/or federal funds to leverage private investment and to enable projects to move beyond assessment through cleanup and successful redevelopment. One of the most significant development projects in the City's history was the Kent Station project, a \$130 million mixed-use destination totaling 700,000 square feet that was developed in downtown Kent on multiple contiguous brownfield sites totaling 25 acres in area. Following an earlier community planning process that resulted in a vision for the downtown, the City acquired 19.9 acres of former industrial property during 1999 to 2001, using \$9 million in short-term loan funds from King County's federal Community Development Block Grant (CDBG) fund and a \$3.9 million loan from the City's utility fund. As part of the property sale, Kent helped finance the cleanup of two hazardous contamination areas, leveraging several sources of funding with a cost to the City of approximately \$68,500.

Unfortunately, the recent economic downturn has significantly impacted Kent, resulting in plant closures, increased unemployment rates and fewer finances to address critical issues (such as Brownfields) in the City. With a 2010 unemployment rate of 10.2%, Kent's rate exceeds that of King County, the State and the United States as a whole. Kent is also notable in being the largest city in the State of Washington with a majority minority population.

The City has secured commitments from a wide range of community based organizations to support the project if funding is awarded to the City. U.S. EPA funding will be used to: (a) complete a community-wide inventory and prioritization of brownfields sites within the City, (b) perform Phase I and Phase II environmental site assessments (ESAs) on priority brownfields sites, (c) complete additional site investigation and remedial action plan development for select sites for which Phase II ESAs are completed, and (d) perform community outreach and education related to brownfields. The City looks forward to working with Ecology, U.S. EPA, the King County Health Department, and other project partners, community-based organizations and stakeholders towards a shared goal of improving the economic and environmental conditions, and building a better and more sustainable future for the residents of the City of Kent.

If you have any questions related to the City's proposal, please contact me at your earliest convenience.

Sincerely,

CITY OF KENT



Mr. Ben Wolters
Economic & Community Development Director

cc: Mr. Don West, Environmental Management Support, Inc. (8601 Georgia Avenue, Suite 500, Silver Spring, MD 20910)

I. COMMUNITY NEED

Incorporated in 1890, the City of Kent (population 118,200) is located 15 miles south of Seattle, in King County (population 1,931,000), Washington. Today, the City occupies a land area of approximately 34 square miles, and is the six largest City by population in the State of Washington. Although Kent was originally an agricultural community, Sanborn fire insurance maps dated 1890 document the presence of some of Kent's first manufacturing facilities, the "Excelsior Manufacturing Company" (a shingle mill), and the "Kent Manufacturing Company" (a door and furniture manufacturer), built along railroad tracks that connected Kent with Seattle and Tacoma. Industrial development in the area accelerated in 1962 following the completion of the Howard A. Hanson Dam, which prevented annual flooding that had plagued the valley surrounding the Green River. Following completion of the dam, developers and industrial giants began to transform the valley. Further fueling development was the completion of the Valley Freeway in 1957, followed by I-5 in 1966 along the western rim of the valley. The physical size of Kent grew from one square mile in 1953 to 12.7 square miles in 1960. The Boeing Aerospace Center was constructed in 1965. The Apollo Moon Buggy was built here in 1970. Other industries followed and in just a few years, Kent transformed from an agricultural community to an industrial mecca. The main industrial area (which is referred to as the Industrial Valley, and includes land in the neighboring cities of Renton and Tukwila) is located along the Green River and occupies an area of over 4,000 acres. Businesses and industry located within the Industrial Valley produce products that are responsible for an estimated 12% of the State of Washington's total Gross Domestic Product (GDP). As such, the vitality of the Industrial Valley is important not only to the economic well-being of Kent but to that for the State of Washington as a whole. Within 20 miles of downtown Kent, there are two interstate highways, a regional rail center, an international airport, and two international deep water seaports. Because of this, the City is one of the leading warehouse distribution centers in the United States. Maintaining this economic vitality into the future is dependent in part on making certain that there is quality and affordable space on which businesses can continue to grow. As the City of Kent is nearly fully developed, most new commercial and industrial development will involve the redevelopment of brownfields.

a. Health, Welfare, and Environment

i) Effect of Brownfields on Targeted Community: The City of Kent has been significantly impacted by brownfields, many of which are located adjacent to the Green River or its tributaries (where they threaten sensitive environments), and/or adjacent to older residential neighborhoods where they threaten the health and economic well-being of disproportionate numbers of minority and economically disadvantaged residents. Although a formal inventory of brownfield sites in the City has not been completed to date, as of November 2011, environmental databases maintained by the Washington State Department of Ecology (Ecology) document the presence of 1,047 confirmed or potentially impacted sites, including 582 hazardous waste generators, 294 underground storage tank (UST) sites, 136 leaking UST (LUST) sites, and three (3) Superfund sites in the City. It is suspected that the sites identified in the environmental databases represent only a fraction of the potential brownfields sites associated with the City's long history of heavy manufacturing industries.

According to the *Kent Economic Development Plan Industrial Center Assessment Report* (October 2011), Kent's total land available for industrial uses is approximately 4,000 acres, of which an estimated 46% are located in the northwest portion of the City within the Industrial Valley, which covers an area in Kent approximately 60 blocks long (north to south) and 40 blocks wide (east to west). According to this same report, the vacancy in Kent's industrial areas is 26%, and consists of 270 vacant parcels totaling over 1,021 acres in area. An additional 130 industrial parcels totaling over 540 acres are designated as "significantly underutilized", having a floor-area (to land) ratio (FAR) of 0.2 or less. The portion of the vacant and/or significantly underutilized area (1,561 acres) that consists of brownfield sites has not been documented, but is likely to include a majority of these parcels. The size of the brownfields sites within the City ranges from 0.5-acre or smaller former dry cleaners to the 110-acre Kent Highlands Landfill (Superfund) site located along the western edge of the City.

The Kent Highlands Landfill (w/a the Seattle Municipal Landfill) site, which was operated by Seattle Public Utilities (SPU), is located on the west side of Kent. The landfill was sited in a deep ravine that sloped downward from west to east toward the adjacent Green River. According to documents provided on the EPA website established for the site, landfill operations began in 1968, and in addition to municipal

waste, the landfill accepted paint residues, industrial sludge, and other industrial wastes. At the time of its closure in 1986, the Kent Highlands Landfill contained approximately eight million cubic yards of waste. In 1984, the presence of volatile organic compounds (VOCs) and heavy metals were discovered in groundwater and leachate east of the landfill. The adjacent Green River is used for spawning and salmon rearing. In addition, landfill gas containing VOCs including trichloroethene (TCE) was detected beyond the perimeter. The surrounding area is a mix of urban residential and commercial areas. In 1988, three public water supply wells (which serviced 18,000 residents) were located within three miles of the landfill. Threats of exposure via ingestion or direct contact with contaminated groundwater and leachate, or through inhalation of landfill gas, were identified as the primary concerns.

The Midway Landfill site, which was also operated by SPU, includes approximately 70 acres and is located between Pacific Highway South and I-5 on the west side of Kent. The landfill was sited in a location that served as a gravel pit between 1945 and 1966. Landfill operations began in 1966, and at the time of its closure in 1983, the unlined Midway Landfill contained approximately three million cubic yards of waste. In 1985, combustible gas was detected in structures around the landfill, resulting in the temporary relocation of 11 families. Contaminated groundwater was also found beyond the landfill boundary. Two elementary schools are also located within a half-mile of the landfill. Based on information presented on the EPA website (<http://vosemite.epa.gov/r10/nplpad.nsf/e/paid/wad980638910>), it is suspected that area residents may have been exposed to contaminants by inhaling landfill gas as well as by ingesting or coming into direct contact with contaminated groundwater. Stormwater from the site drains into McSorley Creek, which is a salmon-bearing stream containing steelhead and cutthroat trout, as well as chum and coho salmon (a candidate for listing under the Endangered Species Act). Both landfills are now major brownfields sites located within the Midway Subarea, a key redevelopment corridor centered on a planned expansion of the Puget Sound light-rail system.

Another brownfields site that has significantly impacted the environment is the 14.5-acre Western Processing site located in the Industrial Valley, adjacent to Mill Creek, a tributary to the Green River. As documented in the EPA's Superfund Fact Sheet (March 2000), the Western Processing Company operated a chemical waste processing and recycling facility at the site from 1961 to 1983 and handled a wide variety of chemical and waste materials generated by some of the Pacific Northwest's largest industries. In 1982, the U.S. EPA discovered approximately 5,000 drums of chemical wastes stored on site, many of which were leaking, corroded, or bulging. Over 1,900 cubic yards of solids and sludge and 930,000 gallons of waste liquids and hazardous substances were removed from the site. Subsequent assessments documented impacts from at least 90 priority pollutants to soil, groundwater, surface water and sediments, including heavy metals, polychlorinated biphenyls (PCBs), chlorinated solvents and other VOCs. In 1988, a fourth phase of cleanup began that included construction of a 40-foot deep barrier wall and a groundwater pump-and-treat remediation system that recovered an average of 140 pounds of contaminants per day from groundwater during its first year of operation. In 1993, contaminated sediments were dredged from the adjacent Mill Creek. As part of the cleanup, a multi-layered cap was placed over the entire 13-acre southern portion of the site and to date, it is estimated that over \$100 million has been spent on the cleanup, a majority of which was paid for by employers in the region and thereby not available for investment in productive economic activities.

Yet another brownfields site within the Industrial Valley with significant environmental impacts is the 33-acre former Salmon Bay Steel Mill located at 22011 84th Avenue South. Industrial operations at the site began in 1962 and consisted of storing and processing crushed automobiles and scrap metal to produce steel products, as well as slag processing, storage and disposal. These activities left behind various stockpiles of contaminated soil and debris, including a slag processing area. During the 1990s, the Kent area was cited for nonattainment for particulate matter air quality (PM-10), and the Salmon Bay Steel Mill identified as the main contributor to air pollution in the Green River Valley. The Puget Sound Clean Air Agency (PSCAA) ordered the Mill to either cut its air emissions or shut down. The owners of the Mill chose to close the facility. Contaminants released to the environment at the site include petroleum, PCBs and lead. The full impact to area residents via exposure to air pollution and preferential deposition of contaminated particulates and other atmospheric fall out on properties throughout the Valley is undetermined.

The social impact of these and other brownfields is magnified as a result of their close proximity to several of the lowest income neighborhoods in the City. The Midway Landfill is bordered on the south by a residential neighborhood and has six mobile home parks located within a one mile radius. The Kent Highlands Landfill is bordered to the north by several residential neighborhoods and has three mobile home parks located within a one mile radius. The Salmon Steel Mill site is located approximately one block west of a large mobile home park. The environmental conditions at many of these sites are either unknown or not fully assessed, leaving adjacent residents unaware of the potential health risks and vulnerable to contamination exposures. Most of these sites are not sufficiently secured to prevent public access, especially by curious children, nor are they sufficiently controlled to preclude the potential for exposures from inhalation or ingestion of volatilized contaminants, contaminated particulates, or contaminated surface and groundwater.

ii) Cumulative Environmental Issues and Effect on Targeted Community: The City of Kent has literally been the dumping ground for the neighboring City of Seattle, with both the Midway and Kent Highlands Landfill sites having been owned and operated by the City of Seattle/SPU. As previously documented, these landfills have threatened water supply wells, sensitive aquatic environs, as well as adjacent residents via the emission of toxic and combustible gases.

As noted in the previous section, the Industrial Valley in Kent has one of the largest concentrations of industrial sites in the Pacific Northwest. These industries included businesses such as Western Processing and Salmon Bay Steel Mill that released enormous quantities of toxic substances into the air, soil, groundwater and/or surface water. The impact of these releases on area residents, in particular from long term inhalation of air pollutants or from exposure to contamination released through atmospheric deposition of air pollutants onto area soil, community gardens or outdoor playground equipment, is undetermined. This impact is exacerbated as a result of the location of many of the lowest income neighborhoods in close proximity to these industrial areas [for example, eight (8) of the City's 18 mobile home parks are located immediately adjacent to industrial areas].

The total documented quantity of hazardous substances that were legally discharged from facilities in Kent [per the online EPA Toxic Release Inventory (TRI) data (<http://www.epa.gov/tri/>)] during 2009 alone was equal to 340,000 pounds, which accounts for approximately 39% of the total reported amount released in King County (875,000 pounds). The air pollution associated with historic manufacturing operations and current air emissions is exacerbated by poor overall air quality present in the region from heavy traffic. According to the Washington State Toxic Air Pollutants Priorities Study dated November 12, 2008, King County is among the worst 5% of counties in the U.S. for health risk from airborne toxic chemicals and is the 2nd highest ranked county in Washington for aggregate toxic air pollutant-associated irritation risk. King County also ranks high for point sources of PCE and TCE in air. Ten of the 12 largest sources of TCE emissions to air in the State of Washington are located in King County. The ambient concentration of benzene of 1.0 $\mu\text{g}/\text{m}^3$ present in King County is double the State average.

iii) Health and Welfare of Sensitive Population Groups: As noted in the table below, over 50% of the population of Kent are minorities, which makes it the largest city in the State of Washington where the majority of the population is minority. Also, as noted in the table, the rate of poverty in Kent is approximately 14.5%, which is approximately 1.5 times the rate within King County. As noted in the previous section, King County is in the worst 5% of counties in the U.S. for health risk from airborne toxic chemicals. Asthma statistics in King County from the "Public Health Data Watch" dated November 2005 support these findings. With respect to sensitive population groups, the report indicates that children, minorities and low-income communities are more susceptible to impacts from asthma. Some of the statistics include:

- Low-income adults (<200% poverty) are 1.5 times more likely to have asthma than high income adults.
- African American and Asian children were more likely to have asthma than children of other racial/ethnic groups.
- People from high poverty communities are much more likely to be admitted to the hospital for asthma compared to people from low poverty communities (about 2 times more likely for adults and 3 times for children).

- Asthma triggers are widespread in the homes of low-income people with asthma: 26% have mold, 16% have cockroaches, 23% have pets, and most have dust mites.

Based on environmental justice data compiled at the Pollution Scorecard website for King County, there is a distinct disparity in potential exposures to environmental hazards for sensitive population groups within the County. Some of the most significant disparities include the ratio of the number of facilities per square mile emitting criteria air pollutants: which is 2.73 times higher for people of color to that of whites; 2.32 times higher for low income families to that of high income families; 2.63 times higher for families below the poverty line to that of families above the poverty line; and, 2.76 times higher for kids below the poverty line to kids above the poverty line. (http://scorecard.goodguide.com/community/ej-summary.tcl?fips_county_code=53033)

b. Financial Need

i) **Demographic Data:** Required demographic data for the City of Kent, King County, the State of Washington, and the United States as a whole, are summarized below.

| Data Type | Year | City of Kent | King County | State of Washington | United States |
|---|---------|--------------|-------------|---------------------|---------------|
| Population | 2010 | 118,200** | 1,931,249 | 6,724,540 | 308,745,538 |
| Unemployment Rate (annual) | 2010 | 10.2% | 8.8% | 9.6% | 9.6% |
| Poverty Rate | 2005-09 | 14.5% | 9.8% | 12.3% | 14.3% |
| % Minority Population* | 2010 | 50.3% | 35.2% | 27.5% | 26.3% |
| Per Capita Income | 2005-09 | \$26,469 | \$37,797 | \$29,320 | \$26,530 |
| Other Data | | | | | |
| Land Area (sq. miles) | 2010 | 34** | 2,116 | 66,456 | 3,531,905 |
| Black % | 2010 | 11.3% | 6.2% | 3.6% | 12.6% |
| Asian % | 2010 | 15.2% | 14.6% | 7.2% | 4.8% |
| Hispanic % | 2010 | 16.6% | 8.9% | 11.2% | 16.3% |
| Language Other Than English Spoken at Home | 2005-09 | 32.8% | 22.9% | 16.5% | 19.6% |
| Bachelor's Degree or higher (% of person's 25+) | 2005-09 | 25.1% | 44.8% | 30.8% | 27.5% |

* Calculated by subtracting the reported % of "total white persons not Hispanic" from 100%. Data for 2010 are from the U.S. decennial census. Data for 2005-09 are from the U.S. Census American Community Survey.

**WA Office of Financial Management annual population projection for July 2011. Includes annexation of Panther Lake area circa July 2010, which added 25,458 residents.

Kent is most notable in being the largest city in the State of Washington with a majority minority population. As shown above, the City of Kent has higher (and in many cases, significantly higher) percentages of minority residents (Black, Asian, Hispanic, and total), as well as higher percentages of residents in poverty or who speak a language other than English at home than either King County or the State of Washington as a whole. The only measure where the percentage for the U.S. as a whole is higher than that for Kent was the percentage of black residents (12.6% in the U.S. versus 11.3% in Kent). Similarly, the percentage of residents with a Bachelor's Degree or higher and the per capita income were lower in Kent than in King County, the State of Washington as a whole, or the U.S. as a whole.

As noted in the Kent Community Profile (dated January 2011), 29% of people living in Kent (as of 2009) were foreign born (compared to 17% in Seattle), and among people at least five years old living in Kent in 2009, 39% spoke a language other than English at home (compared to 21% in Seattle). In 45% of the cases, that language was Spanish. There are over 120 languages spoken in the Kent School District. The top five non-English languages are: Spanish, Russian, Somali, Punjabi and Vietnamese. Approximately 46% of Kent School District students are Caucasian, and 52% are identified as minorities.

ii) **Economic Impact of Brownfields on the Targeted Community:** One of the most significant economic impacts from brownfields on the City has been the loss of property tax revenue that might otherwise have been generated by abandoned, vacant or underutilized properties. In addition, the blight associated with

these properties has in many instances reduced the valuations for neighboring properties resulting in a further loss of tax base and property tax revenue. Another important economic cost has been opportunity costs associated with desirable projects that did not come to fruition as a result in part to liabilities, costs, and potential delays associated with contamination uncovered during the due diligence phase of these projects. There have been other direct costs to the City associated with maintaining and securing vacant or abandoned properties. This includes providing services such as mowing weeds, clearing of snow from sidewalks of abandoned properties, disposing of waste materials illegally dumped on the properties, and response by fire and police personnel to criminal activities that occur at a disproportionately high rate at these types of properties.

iii) Other Demographic Data Demonstrating Economic Need of Area Residents: Recorded plant closings or mass layoffs in Kent during the past several years that involved permanent layoffs include 1,961 workers (since 2004). As noted in the Kent Community Profile dated January 2011, other demographic information that puts the community's economic need in context includes:

- 46% of Kent households qualify as low to moderate income.
- 43% of families with a female head of household and no husband present have incomes below the poverty level (over double the percentage of any other major city in the County).
- 19% of the population aged 25 years or older are high school dropouts (the highest percentage for any major city in King County).
- 47% of Kent grade, middle and high school students qualify for free or reduced price meals.
- In January 2011, a "One Night Count" of the homeless was conducted in portions of Kent which documented 108 homeless individuals (a 45% increase over the count in 2010).

iv) Other Limiting Economic Factors: One significant limiting economic factor that has affected Kent more than any other major city in Washington is the effect of the Streamlined Sales Tax (SST). With the passage of Substitute Bill 5089, Washington changed from an origin-based system for local retail sales tax to a destination-based system, effective July 1, 2008. Previously Washington retailers collected local sales tax based on the jurisdiction from which a product was shipped (the "origin" of the sale). Presently, they must collect based on the destination of the shipment or delivery. As a major industrial and warehousing center (and origin of shipping), Kent continues to be the most affected City in the State of Washington by the SST, with a 250% greater financial impact than Auburn – the city with the 2nd greatest impact. As documented in "Kent SST Mitigation – Inception through Current", since the 3rd quarter of 2008, the City has experienced an estimated total loss in sales tax revenues of over \$14,330,000 as a result of the SST.

Another significant limiting factor is that the State of Washington is one of only two (2) states in the U.S. that does not permit tax incremental financing (TIF) as an economic development tool to help pay the costs for assessment, demolition, environmental cleanup, asbestos abatement, and other activities necessary to facilitate the redevelopment of brownfield sites.

The City of Kent is facing one of the most severe budget crises in its history in part as a result of a budget crisis at the State level. Kent Mayor Suzette Cooke's 2012 proposed budget was presented to the Kent City Council on October 4, 2011. The proposed 2012 Operating Budget totals \$141.7 million, which includes a \$27.6 million cut from the general fund budget that was adopted in 2009. Another reality impacting the budget is that the original revenue estimates provided by King County for the Panther Lake annexation (circa July 2010, which added 25,458 residents) were overstated by almost 15% or \$1.8 million. One of the top priorities for economic development identified during the 2012 budget proposal that is supported by the brownfields project is "to focus on increasing economic development opportunities that provide jobs for Kent residents and initiate actions that will simplify and streamline processes for developers."

These limiting economic factors make supplemental grant funding a necessity to continue to maximize redevelopment potential in the City.

v) Existing Grantee Justification for Additional Funding: Not applicable.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a. Project Description: The primary desired outcomes for the project include building a sustainable brownfields program by developing the "organizational infrastructure" within the City and partners to permanently

enhance the City's processes for assessing, remediating and catalyzing the redevelopment and reuse of brownfield sites. Based on the exceptionally high levels of economic distress, in particular unemployment, other key outcomes will be to spur private investment and the creation of jobs through additional development projects on brownfield sites. The proposed brownfields project will support a wide range of goals that are identified in existing City plans, including but not limited to the City of Kent *Comprehensive Plan* (Revised May 4, 2006) and the City of Kent Economic Development Plan Industrial Center Assessment (October 2011).

The *Comprehensive Plan* was updated in 2006 to bring it into alignment with the Washington State Growth Management Act (GMA), which was produced in response to the rapid rate and patterns of growth throughout the 1980s and 1990's on the west side of the Cascades. The GMA required all jurisdictions within King County, including Kent, to designate an urban growth area (UGA), restricting urban development to the boundaries of the UGA. Planning goals from the GMA and (*Comprehensive Plan*) that will be supported by the brownfields project include:

- Urban growth: Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
- Reduce sprawl: Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
- Environment: Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.

In the *King County Countywide Planning Policies*, Kent was designated as one of five (5) Manufacturing/Industrial Centers (MICs). The policies for MICs state that:

- Jurisdictions with MICs shall have zoning and detailed plans in place to achieve the following goals: Preserve and encourage the aggregation of vacant or non-manufacturing/industrial land parcels sized for manufacturing/industrial uses; discourage land uses that are not compatible with manufacturing, industrial and advanced technology uses.

The *Industrial Center Assessment Development Plan and Profile* provides a strategic assessment of Kent's industrial lands and their importance to Kent and the regional economy, and provides a targeted course of action for industrial economic development in Kent. The brownfields project will support a wide variety of the strategies identified in the Plan, including the following:

- Identifying and marketing opportunity sites with locational advantages and redevelopment potential that can support business expansion and retention efforts.
- Areas of vacant and low investment next to areas of high investment represent areas poised well for redevelopment.
- Available and affordable space and central location will continue to position Kent for future growth.

The project will also advance numerous goals that are identified in recent Subarea plans developed for the targeted areas, including the *Final Environmental Impact Statement (EIS) Comprehensive Plan Review and Midway Subarea Planned Action EIS* (September 2011), which states on page 321 "additional properties within the (Midway) Subarea have been identified on State and Federal brownfield lists. To date, there has been no assessment or testing of these properties to better understand their status as brownfields."

A detailed description of the scope of work proposed for each task of the brownfields project is presented below.

Task 1: Brownfields Inventory – The City proposes to use the assessment grant funding to build an initial inventory of brownfields sites, which has not been completed to date. The data will also be integrated to better relate the presence of hazardous substance brownfields to various economic impacts associated with brownfields, as well as health data. The City will perform the following inventory activities as part of this task:

- Conduct tours/inspections throughout major commercial/industrial corridors in the City to identify blighted or vacant potential hazardous substance brownfields sites that are not recorded in existing environmental databases.

- Review select City records that are potentially relevant to identifying brownfields (including occupancy and other permits, tax delinquency status, building code violations, etc.).
- Review available historical Sanborn fire insurance maps covering the years 1890-1944 to identify historic sites which have a significant potential for impacts from historical land uses.
- Survey local real estate industry representatives for information on sites in the City.
- Review Department of Public Health King County (DPH) records to verify that all sites with known or suspected impacts or threats to public health are being included in the evaluation/prioritization process.

Although the inventory may not identify all potential brownfields sites, it should help to identify and focus attention on sites that are most significant in terms of health impacts, concerns of residents, and/or of interest to the development community. It is anticipated that factors to be weighted the most heavily in prioritizing sites will include: (1) economic development potential/opportunities; (2) known or suspected threats to public health; (3) sites identified in existing community planning documents, (4) degree of known or suspected environmental impacts; (5) degree of blight or underutilization; (6) tax delinquency status; and (7) community concerns.

Task 2: Phase I Environmental Site Assessments (ESAs) – The City will contract with an environmental consulting firm to complete Phase I ESAs at up to eight (8) high priority hazardous substance brownfield sites. Phase I ESAs will be performed in accordance with the All Appropriate Inquiries Final Rule and the standards set forth in the ASTM E1527-05 Phase I Environmental Site Assessment Process. Electronic facsimiles of reports in Adobe Acrobat files will be generated for all Phase I ESA reports, and linked to other site information contained on the brownfields portion of the City’s GIS.

Task 3: Phase II ESAs, Site Investigations, and Remedial Planning – The City will contract with a qualified environmental consulting firm to perform Phase II ESAs, supplemental assessment activities, site investigations, and/or remedial planning on select parcels for which Phase I ESAs are completed, and for which the need for further assessment is identified. It is planned to conduct Phase II ESAs on five (5) sites, and supplemental site investigation and remedial planning activities on approximately two (2) sites.

Task 4: Community Outreach and Involvement – To assure community residents and other stakeholders have meaningful participation in the project, and their concerns are effectively identified and fully considered, community outreach activities will be the most public and inclusive portion of the project. Community outreach and involvement activities will include the following: coordinating and conducting meetings with stakeholders and the general public; seeking, discussing and implementing meaningful public input into the grant processes; preparing and publishing public notices; preparing meeting materials and presentations; preparing and distributing brochures and other public information materials.

For example, when sites are identified for assessment, the primary information flow will be outward to the community, notifying local stakeholders about assessment activities that will occur, sharing results of the assessments, and explaining the health, safety, and environmental significance of the findings. During cleanup and redevelopment planning, the City will inform local stakeholders of plans; solicit feedback on community concerns, needs, and desires; and coordinate with the King County Public Health Department (PHD) to help educate residents on the nature of the identified contamination and remedial activities that will occur. Some of the key community outreach activities will include:

- Solicit community input regarding identification and prioritization of sites of concern;
- Active engagement of community (including neighborhood associations) and stakeholder input regarding redevelopment and cleanup planning, and incorporation of public feedback/input into the planning process.

b. Budget for EPA Funding and Leveraging Other Resources

i) Budget: The proposed budget for the assessment grant project is presented below.

| Line # | Budget Categories | Task 1 | Task 2 | Task 3 | Task 4 | Totals |
|--------|-------------------|-----------------------|--------------|--------------------------------|--------------------|---------|
| | | Brownfields Inventory | Phase I ESAs | Phase II ESAs, RI/FS, and RAPs | Community Outreach | |
| 1 | Travel | | | | \$4,400 | \$4,400 |
| 2 | Equipment | | | | | |

| Line # | Budget Categories | Task 1 | Task 2 | Task 3 | Task 4 | Totals |
|-------------------------------------|-------------------|-----------------------|-----------------|--------------------------------|--------------------|------------------|
| | | Brownfields Inventory | Phase I ESAs | Phase II ESAs, RI/FS, and RAPs | Community Outreach | |
| 3 | Supplies | \$3,000 | | | \$1,400 | \$4,400 |
| 4 | Contractual | \$9,000 | \$32,000 | \$146,000 | \$4,200 | \$191,200 |
| 5 | Other | | | | | |
| 6 | TOTALS | \$12,000 | \$32,000 | \$146,000 | \$10,000 | \$200,000 |
| Estimated # of Sites to Be Assessed | | | 8 | 5+2 Supplemental | NA | NA |

NA = not applicable. RAP = remedial action plan, SI = site investigation

Please note that it is acknowledged by the City that sites assessed using U.S. EPA grant funds during implementation of Tasks 2 and 3 will be required to meet site-specific eligibility requirements and will be subject to U.S. EPA approval either as part of work plan negotiation or following commencement of the overall project. Procurement of all contracted services (i.e., costs listed on line 4 of the budget table) will be performed in accordance with 40 CFR 31.36. U.S. EPA grant funds will not be used for administrative costs as defined in the Proposal Guidelines. Proposed use of U.S. EPA funds is shown on lines one (1) through five (5) of the budget table, with totals for each task presented on line 6.

Task 1 Budget: The budget of \$9,000 for contractual services is based on an estimated 90 hours of work by the consulting firm to assist with the inventory at an anticipated average billing rate of \$100 per hour. It is anticipated that the inventory will require up to 16 hours for completing a drive-by inspection and inventory of select commercial and industrial properties within targeted areas, 20 hours for review of City permit, building inspection and tax records, 12 hours for extraction of data from State and Federal databases and associating the data with parcel numbers in the City's property GIS, 12 hours for review of historical records, 16 hours for compiling all data into GIS compatible formats, and 14 hours for assisting with the site scoring and prioritization process. The \$3,000 budget for supplies includes \$2,500 for acquisition of historical fire insurance maps and other records from an environmental data information service, and \$500 in photocopy and other costs associated with obtaining records from other sources.

Task 2 Budget: The City will contract with an environmental consulting firm to conduct Phase I ESAs at an up to eight (8) sites meeting the site-specific eligibility requirements, and which are approved for assessment by U.S. EPA and/or the State. It is assumed that the Phase I ESAs will be completed by the consultant at an average cost of \$4,000 (\$32,000 total), including time for research and preparation of eligibility determinations for each site, and assuming that several of the sites targeted for assessment may be large or complex brownfield sites with a significant amount of existing documentation that will need to be reviewed as part of the Phase I ESA process.

Task 3 Budget: The budget for this task assumes completion of the following assessment activities by the environmental consulting firm:

- Preparation of one (1) quality assurance project plan (QAPP) at an estimated cost of \$8,000;
- Completion of five (5) Phase II ESAs at an average cost of \$17,000 (\$85,000 total);
- Completion of supplemental Phase II ESAs activities or site investigations at two (2) sites at an average cost of \$13,000 (\$26,000 total); and
- Preparation of two (2) remedial action plans at an average cost of \$7,500 (\$15,000 total).

The costs for the Phase II ESAs and supplemental Phase II ESAs/site investigations include budget for preparation of site-specific sampling and analysis plans and health and safety plans for each site. In addition, \$12,000 is budgeted for assistance to be provided by the consultant with preparation of quarterly and annual reports, and other planning activities to be performed by the consultant in support of execution of the assessment tasks outlined above.

Task 4 Budget: The budget for community outreach includes \$4,200 for the City to contract with a consulting firm familiar with public relations to perform facilitated community outreach meetings. The budget includes \$4,400 for travel, fees and lodging expenses required for two (2) City staff to attend two (2) U.S. EPA National Brownfields Conferences. Travel costs are estimated assuming attendance by the

project director/manager Alisa Pyszka and the assistant project manager Peggy Sheehan at two (2), 4-day brownfield conferences, with airfare costs of \$500 per person per conference (\$2,000 total), and daily expenses for hotel and meals of \$125 per person per day (\$2,000 for 8 days), and \$25 per person per day for incidentals (taxi rides, parking, seminar fees, etc. - \$400 total) Budgeted supply costs for Task 4 of \$1,400 include \$500 for printing costs, \$400 for mailing expenses associated with public notices, and \$500 for display boards and similar graphic displays for use at public meetings.

ii. Plan for Tracking and Measuring of Progress towards Expected Project Goals, Outcomes, and Outputs: The City's goals for its Brownfields Program are to reduce environmental threats to area residents, to reduce sprawl and preserve greenspace, and to improve economic conditions, in particular levels of employment. The City will align these goals to match U.S. EPA's expected outcomes and outputs. The following outputs will be tracked and documented on at least a quarterly basis: regular updated project spreadsheet: (1) number of potential brownfield sites identified and prioritized, (2) number of Phase I ESAs performed, (3) number of Phase II ESAs performed, (4) number of environmental site investigations performed, (5) number of sites for which remedial planning is performed, and (6) number of community meetings held.

The City will document, track and evaluate the following outcomes on at least a quarterly basis throughout the project for brownfield sites on which assessment funding is utilized: (1) number of sites assessed, (2) number of sites for which off-site risks are identified, (3) number of sites for which property title transfers are facilitated, (4) number of sites and acres of land redeveloped, (5) acres of parks or other greenspace created, (6) length of walking or bike trails created, (7) amount of private investment leveraged for redevelopment projects, (8) amount of other funding leveraged for redevelopment projects, (9) number of jobs created or retained associated with redevelopment projects, (10) increased property and sales tax revenue generated, and (11) increased property value. Progress towards achieving outcomes and outputs will be reported to U.S. EPA via the quarterly progress reports and the Assessment, Cleanup, and Redevelopment Exchange System (ACRES).

iii) Leveraging: The City has a successful track record of partnering with developers and private businesses to facilitate the redevelopment of brownfield sites within the City. The City coordinates with outside agencies and organizations to provide economic development grants or financing to the extent available under state law. The City has been significantly involved in several recent brownfields redevelopment projects that used City, State of Washington, and/or federal funds to leverage private investment and to enable projects to move beyond assessment through cleanup and successful redevelopment. One of the most significant development projects in the City's history was the Kent Station project, a \$130 million mixed-use destination totaling 700,000 square feet that was developed in downtown Kent on multiple contiguous brownfield sites totaling 25 acres in area. Following an earlier community planning process that resulted in a vision for the downtown, the City acquired 19.9 acres of former industrial property during 1999 to 2001, using \$9 million in short-term loan funds from King County's federal Community Development Block Grant fund and a \$3.9 million loan from the City's utility fund. As part of the property sale, Kent helped finance the cleanup of two hazardous contamination areas.

As documented in the "Ecology Model Toxics Control Act (MTCA) Remedial Action Grants – Alternative Financing Evaluation", (January 2010), Washington State is a leader in brownfield site redevelopment because of the availability of Remedial Action Grants as a dedicated, state-administered revenue stream to stimulate redevelopment of brownfields by participating local government partners. In 1988, Washington voters approved Initiative 97, known as MTCA, Chapter 70.105D Revised Code of Washington. In addition to regulating the cleanup of contaminated sites, MTCA created a grant and loan program to support local municipalities in addressing potential assessment and cleanup liabilities associated with these sites. Funds for this program come from a tax (0.7%) on the first possession of imported hazardous substances in Washington, including petroleum products and pesticides. The grants typically require a 50% match of the state funds. Over the last 20 years, the state has invested \$345 million through MTCA Remedial Action Grants, matching \$290 million in local government funds to undertake some 242 cleanup projects. The grants provide a significant resource for moving sites for which assessments have been performed, through the next step of environmental cleanup.

All of the funding sources references above are potentially available to the City for use on priority sites targeted for assessment under this grant, and will be utilized as needed to advance sites beyond assessment, through cleanup and successful redevelopment and reuse. It is anticipated that the City will make strategic use of these and other potential funding sources as necessary to complete environmental assessment, cleanup, and other activities as needed to ensure the successful revitalization of sites assessed using U.S. EPA funds.

c. Programmatic Capability and Past Performance:

i) Management Systems in Place to Direct Activities Under this Grant: The City has planning, engineering, legal, and other staff with the proven experience and expertise to both manage the brownfields assessment grant project, and to provide support services as necessary to move the prioritized brownfields sites from the initial assessment and planning phase through the complete redevelopment process. Information on the experience and qualifications of key personnel who will be responsible for managing and implementing the grant is provided below.

Ben J. Wolters, Economic & Community Development Director, City of Kent: Mr. Wolters will serve as the project director and will be responsible for managing implementation of the grant if awarded to the City. Mr. Wolters currently oversees the Economic Development, Planning Services, Building Services, Permit Center and Development Engineering Divisions on behalf of the City. Mr. Wolters has 24 years of experience in economic development and public affairs. Prior to coming to the City of Kent, he worked as the Economic Development Director for the City of Renton as well as for the City of Seattle's Office of Economic Development, where he was responsible for recruiting and retaining businesses and investment in the industrial, high tech and service sectors. In 1997, Mr. Wolters became the City of Seattle's Brownfield Coordinator, and together with King County, helped secure one of sixteen Brownfields Showcase Community designations in the nation. Mr. Wolters has overseen over \$20 million in federal grants and loans from the Department of Housing and Urban Development (HUD), Economic Development Administration (EDA) and U.S. EPA. Mr. Wolters is a graduate of Oregon State University, holds a Master's Degree in International Economics from the University of Denver and is certified as an Economic Development Finance Professional by the National Development Council.

Joshua C. Hall, Economic Development Specialist, City of Kent: Mr. Hall will assist with implementation of the grant and will be involved with all components of project, which will assure project continuity in the event Mr. Wolters becomes unavailable to fulfill these duties. As an Economic Development Specialist for the City, Mr. Hall works closely with the business community to strengthen Kent's businesses and economy. Mr. Hall also focuses on developing Kent's neighborhood business districts through organizational capacity building and business technical assistance. Prior to his employment with the City of Kent, Mr. Hall was a Business Development Manager for the Washington State Department of Commerce, where he was responsible for business recruitment and retention in the Manufacturing, Aerospace, and Information Technology industry sectors, and where he was involved in the successful recruitment of companies such as Dell and SGL Carbon Fiber. Mr. Hall is a graduate of Eastern Washington University, and holds a Master's Degree in Urban and Regional Planning with an emphasis in Economic Development.

The City has a professional human resources department with the staff resources, experience and expertise to recruit qualified replacements for any key project staff that depart. The human resources department and the City has a large pool of highly qualified candidates from which to recruit replacement staff. The staff has significant experience and expertise in implementing planning and engineering activities associated with major brownfields redevelopment projects. The City routinely contracts out for more than \$44,000,000 per year for contract and professional services, including engineering and consulting services, and has all of the management and procurement procedures in place to procure these services through a fair and competitive process, and to manage the consultants as they complete assignments on behalf of the City.

ii) Adverse Audit Findings: There have been no adverse audit findings related to administration of grants received by the City during at least the past 5 years. The City has strong financial controls, and per State statutes, conducts an annual audit on the financial statements of all government activities. For the comprehensive annual financial reports for the Fiscal Years ending December 31, 1994 through December 31, 2007, the City was awarded the Government Finance Officers Association (GFOA) of the

United States and Canada **“Certificate of Achievement for Excellence in Financial Reporting” for 13 consecutive years** (less than 10% of all governmental entities nationally receive this award). Due to staff reductions, for the past three years the City has not prepared the submittal package necessary to be considered for this award.

iii) Past Performance for Applicants that Have Not Received a Previous EPA Brownfields Grant: The City of Kent has not previously been awarded a U.S. EPA brownfield grant, but has been a recipient of numerous federal and State of Washington funding or assistance agreements. Information on five of the most recent are:

| Year | Agreement Description | Amount |
|---------|--|-------------|
| 2008 | WA Dept. of Ecology; GMA Planning Grant; Midway Corridor Planning; Develop land use policies, develop regulations and implementation strategies within the high capacity transit corridor of Pacific Highway. | \$125,000 |
| 2009 | Neighborhood Stabilization Program (NSP-1); Hired developer to purchase, rehabilitate, and sell three foreclosed properties in Kent. | \$475,264 |
| 2010 | Community Development Block Grants (CDBG); Obtained annual grants between 2003-2011 as an Entitlement City. 2010 Grant funded five (5) public service projects and four (4) capital projects. 100% of expected objectives were met. | \$848,557 |
| 2010-11 | U.S. Army Corps of Engineers; Lake Meridian Outlet Channel; This is a three phase project which includes creation of new stream channel for fish habitat, connecting easterly from the outlet from Lake Meridian to Big Soos Creek. Total project cost: \$4.4 M – City of Kent paid \$1.5 M and U.S. Army Corps of Engineers paid \$2.9 M. | \$2,900,000 |
| 2011-12 | U.S. Army Corps of Engineers; The project will provide summer rearing habitat and high flow winter refuge for salmon through creation of a new off-channel area from the main stem of the Lower Green River and across the river from the mouth of Mill Creek-Auburn (Leber Homestead). | \$4,500,000 |

Currently, the City of Kent is managing approximately \$4.5 million worth of funding awarded under the American Recovery and Reinvestment Act (ARRA). The City manages these funds according to the standards and procedures as prescribed by the granting agency. The City’s Department of Finance has the necessary financial controls and systems in place for the effective fiscal oversight of federal grant funds. City staff have successfully managed these agreements and fully complied with all reporting and administrative requirements. The projects funded via the agreements were successful in achieving the desired objectives and outcomes.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. **Plan for Involving the Affected Community:** The plan for involving the community in implementation of the brownfields assessment grant will build on recent efforts used in updating the City’s *“Comprehensive Plan”* (2006) and in developing a *“Midway Subarea Plan and EIS”* (2011) which successfully engaged residents and other stakeholders. Using a similar approach, the City will provide the community with information about the Project and solicit and process public input regarding Project activities. The City will also work closely with the six (6) community-based organizations (CBOs) that have volunteered to serve as partners for the Project, as detailed in Section 3.c.

Following the grant award announcement, the City will draft a press release for circulation in the local newspaper, the Kent Reporter. The City will also place advertisements on local radio stations, as well as their own municipal television station (KentTV21). The City has a strong communication network, via their website, Twitter, Facebook, and e-alerts that the community (with internet service) can elect to receive. The Kent Chamber of Commerce (KCC) and Center of Advanced Manufacturing Puget Sound (CAMPS) will assist in organizing participation by community residents, stakeholders with an environmental interest in the Project and businesses. The Kent Downtown Partnership (KDP), East Hill Community Network Council (EHCNC), Saltair Hills Neighborhood Council (SHNC) and Lakes at Kent Neighborhood Council (LAKNC) will assist with organizing participation by businesses and residents of the greater Kent community. During the meetings, the City will provide the community with background information on the Project, and solicit public input regarding health and welfare issues and redevelopment

opportunities. If potential health threats to the community are identified, the PHD will assist with community involvement and education related to these threats. When cleanup and/or redevelopment planning is initiated for a site, more intensive involvement activities, including explanations of plans and solicitation of feedback on those plans, will be implemented. The intensive “information out, feedback in” process will continue throughout the cleanup and redevelopment decision-making process.

Although it is anticipated that a majority of project communications will be in English, the City will work with both Kent Public Schools and the PHD to develop and distribute information and perform outreach as needed on the brownfields program in Spanish and other major languages used by the major minority groups in Kent (including Russian, Somali, Punjabi and Vietnamese). As noted previously, the Kent School District is currently serving students with over 120 primary languages and has resources to support outreach to the major language groups. Similarly, the PHD is equipped to support outreach (in particular regarding environmental health issues) for an even greater number of languages spoken by residents throughout King County.

b. Partnership Development Plan: The City will continue its existing partnership with Ecology to help ensure appropriate assessment and cleanup of brownfield sites. A letter of acknowledgement from Ecology is provided in Attachment B. Environmental investigation, monitoring, and remedial planning activities will be conducted in compliance with the rules and guidance promulgated by Ecology under MTCA Chapter 70.105D RCW and Washington Administrative Code (WAC) 173-340, and other Washington regulations as applicable. The City will coordinate with Ecology staff (in Bellevue and Olympia) for technical support, resolution of regulatory or procedural issues, and interpretation of rules and guidance documents. It is anticipated that Ecology may also serve as a partner for select sites by providing funding under their Brownfields Remedial Action Grant program. Ecology will also review and approve Remedial Action Plans (RAPs) for brownfield sites where response actions are to be completed.

It is anticipated that the PHD will contribute to the site prioritization and initial assessment phases of brownfield redevelopment projects. When contamination is discovered on brownfield sites, the cleanup criteria established by Ecology under MTCA will be used to identify and address on-site health and environmental threats posed by contamination identified on these sites. The expertise and experience of the PHD will be called upon to help identify/verify off-site health threats posed by identified contamination; identify related toxicological issues and perform risk evaluations with further assistance from the Washington State Department of Health (DOH); design and conduct notification/education programs; and coordinate health testing (e.g., blood-lead tests in children near sites like foundries) if migration of contamination from a brownfield site is confirmed.

The City will work with the Seattle-King County Workforce Development Council (named earlier in 2011 as one of the top four workforce boards in the United States) and other area partners to seek ways to anticipate and address workforce needs and opportunities related to the brownfields program and the manufacturing, commercial and other businesses that the City hopes to attract to many of the brownfield sites. The City will also work with representatives from King County [(and the Environmental Coalition of South Seattle (ECOSS)], which was the recipient of four previous U.S. EPA Brownfields Job Training Grants (in 1999, 2004, 2008, and 2010), and seek to find opportunities for “graduates” of the recent training programs to find work associated with the assessment and cleanup of sites targeted for assessment.

c. Description and Role of Key Community-Based Organizations

The City has obtained commitments from six (6) CBOs to serve as active partners in the Project as described below. Letters of support and commitment from each organization affirming these roles and their participation are provided in Attachment C.

Center of Advanced Manufacturing Puget Sound (CAMPS); (Tom McLaughlin, Executive Director, 417 Ramsay Way, Suite 112, Kent, Washington, 98032. Phone: 253-856-9595 ext. 5301): CAMPS is a not-for-profit membership organization and resource center bringing together manufacturers, supply chain partners, pre-qualified business development specialists, and strategic partners. CAMPS has committed: (a) serve on the brownfields advisory committee (BAC) to provide

specific input on recruiting businesses that may have an interest in developing or investing in sites targeted for assessment; (b) helping to distribute information on the brownfields program and outreach.

Kent Downtown Partnership (KDP); (Dawn Colston, President, 202 West Gowe Street, Kent, Washington, 98032. Phone: 253-813-6976): The KDP is a private non-profit business association that partners with downtown businesses, property owners, residents, City of Kent, and the Kent Chamber of Commerce. KDP has committed: (a) serve on the BAC and (b) helping to distribute information.

Kent Chamber of Commerce (KCC); (Andrea Keikkala, Executive Director, 524 W. Meeker Street, Suite 1, Kent, Washington, 98035. Phone: 253-854-1770): Since 1948, the KCC has been serving the community, supporting area businesses, and promoting tourism. KCC is a private non-profit business association that partners with downtown businesses, property owners, residents, the City, and the KDP. KCC has committed to: (a) serve on the BAC.

East Hill Community Network Council (EHCNC); (Barbara Phillips, President, 11921 SE 217th Street, Kent, Washington, 98031. Phone: Not available): EHCNC was founded in 2009 and was formed to work with various community representatives to help connect Kent East Hill residents with resources to help them achieve personal, social, and financial success. Kent's East Hill is the primary population center of Kent and is also the most diverse neighborhood in the community. EHCNC has committed to support the Project by participating in public outreach efforts to the residents of East Hill.

Saltair Hills Neighborhood (SHNC) (Colleen K. Cristel, Council Member, 2130 S. 248th Street, Kent, Washington, 98032. Phone: 206-824-5588): The SHNC is a neighborhood located on the west side of the City, between the Kent Highlands Landfill and the Midway Landfill. SHNC has committed to: (a) serve on the BAC.

Lakes at Kent Neighborhood Council (LAKNC) (Diane DeMeerleer, Council Member, Corner of Russell Road and West James Street, Kent, Washington, 98032. Phone: 253-520-5515): The LAKNC is a neighborhood located on the west side of the City, between the Kent Highlands Landfill (to the west) and the Kent Industrial Valley to the north and east). LAKNC's mission is to maintain, enhance, preserve livability, lifestyle, property values and security of its neighborhood. Due to their location, they are located near numerous brownfields sites. The LAKNC has committed to: (a) serve on the BAC and (b) helping to distribute information on the brownfields program.

4. PROJECT BENEFITS

a. Welfare and/or Public Health Benefits: The City expects the environmental and public health benefits associated with the assessment and eventual cleanup and redevelopment of its brownfields to include reduced exposure of residents (and especially children and sensitive populations) to contaminants present at brownfields properties, improved groundwater quality, healthier surface water and aquatic environments, safer land surfaces, and better air quality. The assessment grant will support characterizing brownfields in the City in an organized and comprehensive manner. This process is critical in identifying sites that may pose a threat to human health and the environment. The City's brownfields pose threats by exposing the public to documented and undocumented areas and types of contaminants within soil, groundwater, or within hazardous building materials. Threats to residents can be mitigated by bringing these sites and hazardous building materials to the public's attention and completing site assessments designed to identify the presence and extent of contamination, followed by direct remediation/abatement and/or redevelopment to re-establish site control through engineering and/or institutional controls. The grant will improve public awareness of brownfields and their associated health risks, including residents who have limited English proficiency. This is especially important in the impoverished neighborhoods and other low-income, minority, and/or sensitive populations that may have grown accustomed to brownfields and may not view them as unusual or dangerous.

The assessment grant will also support the City's efforts to protect and enhance the Green River and its tributaries, which run through the Industrial Valley, eventually discharging to the Puget Sound via the Duwamish River. The assessment of sites along the banks of the Green River will allow the City to determine if contaminated soil and groundwater is impacting the water and sediment quality in the river, and posing an ecological threat to fish and other aquatic organisms living within the river. If migration of contaminants to the Green River is documented, the City can utilize the assessment grant funds to assess and develop feasible clean-up or control options. The redevelopment of sites near the river, in conjunction

with improved area storm water management practices will limit uncontrolled, potentially contaminated runoff from entering the river. This will improve the ecosystem, protect threatened species such as salmon, and benefit both environmental receptors and residents seeking to enjoy the river's recreational opportunities.

As part of the brownfields inventory to be completed, readily accessible environmental, public health, and other records will be reviewed to determine whether any of the sites being considered for assessment might represent an imminent or immediate threat to public health or welfare. If any such sites are identified, they will then be prioritized for assessment in order to accurately assess and address these threats at the earliest possible date.

Measures to protect area residents from contaminants during the assessment process will be implemented. Residents in residential areas bordering a site targeted for assessment will be notified in advance of the planned assessment activities by mail or other means, and provided with contact information in the event they have questions before, during, or after the assessment process regarding: (a) known or suspected risks, (b) findings, or (c) other issues/concerns. Appropriate measures to control site access will be identified and documented as part of each site-specific sampling and analysis plan. Dust control measures will be implemented as appropriate at sites with known or potential contamination present at or near the ground surface or within exposed building components. Notices will be posted at the entrance to the assessment sites prior to and during the assessment process with contact information for area residents and other passersby. Investigative wastes will be stored, characterized, managed, and disposed of in a manner that is protective of public health, complies fully with applicable State and Federal regulations, and in accordance with procedures detailed in the QAPP and the SAPs.

b. Economic Benefits and/or Greenspace

i) Economic Benefits: Removal and/or redevelopment of the abandoned commercial and industrial sites located throughout the City will reduce the disproportionate negative impact on home values in the surrounding neighborhoods, help encourage improved property values and homeowner equity in the area, and increase the tax base. The redevelopment of old commercial buildings within neighborhoods and at transportation nodes in the planned Midway Subarea light-rail corridor will create mixed-use units that will provide additional housing opportunities and retail jobs. These mixed-use developments will draw residents and visitors back to currently underutilized areas in Kent and support its continued transformation into a regional center for culture, education, and entertainment. Increased housing and retail options will help to improve living conditions in struggling portions of the City and near planned redevelopment neighborhoods, and attract additional service and retail development, revitalizing portions of the City and further increasing the tax base.

The redevelopment of industrial sites in the City will stimulate the local economy by providing new family wage job opportunities in a City. With new job opportunities, unemployed and disenfranchised workers will be able to better support their families and invest in their community, improving living conditions in struggling neighborhoods, and further improving the tax base. Similarly, stimulating the consolidation of numerous small brownfields sites (e.g. dry cleaners, car repair shops, etc.) located throughout the older areas of the City will result in the creation of larger parcels that will be more attractive to developers and businesses looking to expand. As brownfield sites are redeveloped as mixed-use professional, commercial, and residential units, it is anticipated that the City will attract residents from surrounding areas. This will also diversify the City's work force, attract additional service and retail development, and further revitalize the area, improving both the income and property tax base. Most importantly, the City will have a more heterogeneous economic base and workforce, rendering it less vulnerable to the swings in the economy.

The U.S. EPA funding will also provide direct financial benefits to the City. To the extent the assessment grant meaningfully catalyzes redevelopment of brownfields, private investment, and the creation of jobs, this will result in property tax and utility revenues and an improved financial condition for the City, which will free up additional funds to support the brownfields program.

ii) Other Non-Economic Benefits Associated with Sites to be reused for Greenspace or Other Not-for-Profit Activities: The brownfields assessment grant will reinvigorate the City's ongoing efforts to acquire and convert brownfields into greenspace (parks and trails), in particular, in the Industrial Valley along the

Green River trail system and the Interurban Trail which runs along a Puget Sound Energy (PSE) utility corridor adjacent to the BNSF railway. The assessment grant funds will support this effort by enhancing the City's ability to assess potential environmental health threats at these parcels prior to acquisition. No additional greenspace will be created that cannot be maintained or protected from potential environmental threats.

As previously mentioned, two of the most significant brownfield redevelopment challenges facing the City include the Kent Highlands and Midway Landfills. While long-term remediation and monitoring are ongoing, SPU, which maintains the two sites, is interested in working with Kent to move these two sites toward some form of beneficial use. In an effort to better understand how to approach consideration of future uses at these sites, Seattle sought the assistance of EPA's Superfund Redevelopment Initiative (SRI) in April 2006. Beginning in May 2006, the SRI team conducted a reuse and planning study that was led by staff from Seattle, Kent, and supported by SPU, Ecology and EPA Region 10. The reuse evaluation and planning study created a framework for thinking about a broad range of uses for these two valuable but challenged site properties, rather than presenting a definitive plan for the reuse of the sites. Additional assessment, engineering and market studies will be necessary to determine optimal redevelopment strategies at the sites. As documented in the report "A Reuse Planning Report, Kent Highlands & Midway Landfills", dated February 2007, SPU and Kent are now working together to optimize site reuse opportunities, as both sites are located within the Midway Subarea, a key redevelopment corridor which will support expansion of the Puget Sound light-rail system. A letter of support and commitment from SPU affirming their support and planned participation in the brownfields assessment project is provided in Attachment E. Due to the subsidence and significant topography challenges at the landfills, one of the most likely future uses for a majority of the 180 acres is greenspace, which may include a trail network that could connect development areas on the western portion of the site with passive recreation areas located on the eastern portion of the site, as well as connection with trails along the adjacent Green River which could be then link up with the Interurban trail.

The City Councils 2012 Vision Statement is: "Kent is a safe, connected and beautiful city, culturally vibrant with richly diverse urban centers. The brownfields project directly supports the Vision Statement and the following 2012 Kent City Council Strategies:

- Create connections for people and places: Create connections for people and places by improving and expanding trails and roadways.
- Beautify Kent: Implement a plan for a "Green Kent", targeting greenways to include better use of open space and trees. Leverage code enforcement to rid the city of unsightly areas.

c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse: The U.S. EPA grant will provide environmental benefits beyond the assessment and remediation of contaminants, by catalyzing brownfield redevelopment projects that make use of existing utility, infrastructure, and transportation networks. Many of the City's brownfields consist of abandoned or vacant buildings, which are currently serviced by infrastructure sufficient to support their redevelopment and reuse. Many of these buildings are structurally sound and only require remodeling and updating to be ready for reuse. The assessment grant will support the reuse of the buildings on these brownfields, reducing the amount of energy and resources required for new construction or required to extend utilities to undeveloped areas. The City's "Comprehensive Plan" (2006), provides a framework whereby any new development occurring on brownfields properties will fit in with the desired long term vision for the City, and incorporate sustainable design practices. The City is promoting energy efficiency as one element of its overall sustainability program, which is currently anchored by significant growth management, land preservation, and resource recovery initiatives. The City emphasizes energy efficiency through the LEED program and other sustainability principles and practices. One of the best examples of energy efficiency projects completed in recent years is the City's ShoWare Center, a multi-purpose sports and entertainment facility constructed in 2009. The ShoWare Center was awarded LEED Gold certification by the U.S. Green Building Council. The designation made the ShoWare Center the first sports arena in North America to achieve such a rating. As documented in the Kent Reporter article dated July 22, 2009, Kent Mayor Suzette Cooke stated "Receiving LEED Gold certification reaffirms our efforts to balance economic development with being good stewards of the environment".

Appendix 3

Special Considerations Checklist

Please identify (with an *X*) if any of the below items apply to your community or your project as described in your proposal. EPA will verify these disclosures prior to selection of the grant.

- Community population is 10,000 or less
- Federally recognized Indian tribe
- United States territory
- Applicant assisting a Tribe or territory
- Targeted brownfield sites are impacted by mine-scarred land
- Targeted brownfield sites are contaminated with controlled substances
- Community is impacted by recent natural disaster(s)
- Project is primarily focusing on Phase II assessments
- Community demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation
- Community experiencing plant closures (or other significant economic disruptions), including communities experiencing auto plant closures due to bankruptcy
- Applicant is a recipient of a HUD/DOT/EPA Partnership for Sustainable Communities grant

Attachment A: Threshold Documentation

THRESHOLD CRITERIA FOR BROWNFIELDS ASSESSMENT GRANTS

A. Applicant Eligibility: City of Kent is a “general purpose unit of local government” as that term is defined in 40 CFR Part 31 and is therefore eligible to receive U.S. EPA funds for Brownfields Assessment.

B. Letter from Environmental Authority: A letter of support signed by the Washington State Department of Ecology (Ecology) is presented as Attachment B.

C. Site Eligibility and Property Ownership Information: Not applicable for proposals for community-wide assessment grants.

D. DUNS Number: Applicant DUNS # 020253613

Attachment B: Letter from the State

- Washington Department of Ecology: Mr. John Means, Brownfields Program Planner, Toxics Cleanup Program



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

November 16, 2011

Ms. Deborah Burgess, Brownfields Coordinator
U.S. Environmental Protection Agency
Washington Operations
300 Desmond Drive, Suite 102
Lacey, WA 98503

Dear Ms. Burgess:

The City of Kent (City) will submit an application for two Community-Wide Brownfields Assessment grant under the Environmental Protection Agency's (EPA) Fiscal Year 2011 Brownfields Program. The application will contain submission for one Petroleum Brownfields Assessment Grant (\$200,000) and one Hazardous Substances Brownfield Assessment Grant (\$200,000). For this application, the Department of Ecology (Ecology) is required to provide EPA with a letter acknowledging we are aware the applicant plans to conduct assessment activities.

Mr. Ben Wolters, representing the City, informed Ecology of plans to apply for these federal funds to conduct brownfield assessment activities. Ecology understands the City is applying to EPA for one Community-Wide Assessment grant so they have the flexibility to address sites as they are identified.

The Ecology point of contact for this project is Bob Warren of our Northwest Regional Office. His telephone number is (425) 649-7054.

Sincerely,



John Means
Brownfields Program Planner
Toxics Cleanup Program

Cc: Ben Wolters, City of Kent
Bob Warren, Toxics Cleanup Program – Northwest Regional Office
Diane Singer, Waste 2 Resources – Headquarters
Jessica Brandt, Toxics Cleanup Program – Headquarters



Attachment C: Community-based Organization (CBO) Letters of Support

- Center of Advanced Manufacturing Puget Sound, Tom McLaughlin, Exec. Director
- Kent Downtown Partnership, Dawn Colston, President
- Kent Chamber of Commerce, Andrea Keikkala, Executive Director
- East Hill Community Network Council, Barbara Phillips, President
- Saltair Hills Neighborhood Council, Collen Cristel, Council Member
- Lakes at Kent Neighborhood Council, Diane DeMeerleer, Council Member

CAMPS

Center for Advanced Manufacturing Puget Sound

November 23, 2011

Mr. Ben Wolters
Director
City of Kent
Economic and Community Development Department
220 4th Avenue South
Kent, WA 98032

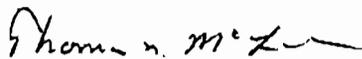
RE: Letter of Support for Application the City of Kent to the U.S. EPA for Grants for Assessment of Hazardous Substances and Petroleum Brownfields

Dear Mr. Wolters:

The Center of Advanced Manufacturing Puget Sound (CAMPS) is writing this letter in support of the City of Kent's efforts to obtain U.S. EPA grants for the assessment of Brownfields located in the City of Kent. CAMPS is a resource center bringing together manufacturers, supply chain partners, pre-qualified business development specialists, and strategic partners. CAMPS is a not-for-profit membership organization representing small and mid-sized manufacturing businesses working through strategic partnerships in the region.

CAMPS believes eliminating and redeveloping blighted, vacant, and contaminated properties is crucial to the economic and community development throughout the City of Kent, especially in the industrial Valley. CAMPS and our members look forward to embracing these opportunities and collaborating with the City on projects generated by these grants. We will also be willing to distribute any information about the process that will benefit our members and be a participant in your Brownfield Advisory Council.

Sincerely,



Tom McLaughlin
Executive Director
Center for Advanced Manufacturing Puget Sound (CAMPS)

Tel (253) 856-9595 ext 5301 • Cell (253) 298-7490 • Fax (253) 854-8567
GRCC Kent Campus, 417 Ramsay Way, Suite 112 • Office 262 • Kent, WA 98032-4501
www.camps.us.com

M A N U F A C T U R I N G S U C C E S S



November 14, 2011

Mr. Ben Wolters, Director, City of Kent
Economic & Community Development Dept.
220 4th Avenue, South
Kent, WA 98032

RE: Letter of Support: Application by City of Kent to the U.S. EPA for Grants of Hazardous Substances and Petroleum Brownfields

Dear Mr. Wolters:

The Kent Downtown Partnership is pleased to support efforts by the City of Kent to obtain funding from the U.S. EPA for community-wide grants for assessment of hazardous substance and petroleum Brownfields.

One or more grants would be very valuable to the continuing efforts to preserve and restore our historic downtown Kent. The Kent Downtown Partnership works to create a thriving and vibrant downtown through preserving and promoting Kent's historic downtown. It is our belief that redevelopment and clean-up of Brownfield's in the City of Kent is a crucial step in attracting new business and residents to our community. Specifically, we will support the project by having a representative serve on the City's brownfields advisory committee. We will also assist with distributing information on the brownfields program to the business community. Finally, we will assist with other outreach activities, especially those targeting the business community.

We look forward to embracing these opportunities and collaborating with the City on projects generated by these grants. It is always a pleasure working with the City; together we have been able to accomplish a great deal more than individually. We appreciate the great work the City does.

Respectfully,

A handwritten signature in black ink that reads "Barbara Smith". The signature is written in a cursive, flowing style.

Barbara Smith, Executive Director
KDP



KENT CHAMBER
OF * COMMERCE

November 28, 2011

Mr. Ben Wolters
Director
City of Kent Economic and Community Development Department
400 W Gowe
Kent, WA 98032

Dear Mr. Wolters:

The Kent Chamber of Commerce supports efforts by the City of Kent to obtain funding from the U.S. EPA for community wide grants for assessment of hazardous substance and petroleum brownfields. Since 1948, the Kent Chamber of Commerce has been serving the community, supporting area businesses, and promoting tourism. It is our belief that redevelopment and cleanup of brownfields in the City of Kent is a crucial step in attracting new business and residents to our community.

We look forward to embracing these opportunities and collaborating with the City on projects generated by these grants and will be pleased to be a participant in the City's Brownfield Advisory Committee.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrea Keikkala'. The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Andrea Keikkala
Executive Director
The Kent Chamber of Commerce

November 18, 2011

Mr. Ben Wolters
Director
City of Kent
Economic and Community Development Department
220 4th Avenue South
Kent, WA 98032

RE: Letter of Support for Application the City of Kent to the U.S. EPA for Grants for Assessment of Hazardous Substances and Petroleum Brownfields

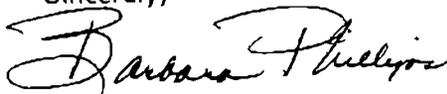
Dear Mr. Wolters:

The East Hill Community Network Council is pleased to support efforts by the City of Kent to obtain funding from the U.S. EPA for community wide grants for assessment of hazardous substance and petroleum Brownfield's. One or more grants would be very valuable to better understanding the sites within Kent that need to be cleaned and possibly redeveloped. The East Hill Community Network Council works to develop and enhance relationships with students, parents, and the broader community on the East Hill.

The opportunity to identify and clean sites within Kent's East Hill is a benefit to the health and welfare of the families within Kent. Kent's East Hill is the primary population center of Kent and is also the most diverse community. It is our belief that identification and cleanup of Brownfield's in the City of Kent is a crucial step in ultimately addressing issues related to housing, open space, and community building.

We look forward to embracing these opportunities and collaborating with the City on projects generated by these grants. Should these grants be funded, we would be pleased to help the city connect with the community and residents of the East Hill.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Phillips".

Barbara Phillips
President
East Hill Community Network Council

Mr. Ben Wolters
Director
City of Kent
Economic and Community Development Department
220 4th Avenue South
Kent, WA 98032

Dear Mr. Wolters:

The Saltair Hills Neighborhood Council is pleased to support efforts by the City of Kent to obtain funding from the U.S. EPA for community wide grants for assessment of hazardous substance and petroleum Brownfield's. These grants would be very valuable to the continuing efforts to clean and redevelop sites within the City that have been contaminated or idle. Our neighborhood is all too familiar with the impacts of contaminated sites, located near two legacy landfills owned by Seattle Public Utility. It is our hope these grants will help identify how these sites can be redeveloped and bring vital economic development to our neighborhood.

We look forward to embracing these opportunities and collaborating with the City on projects generated by these grants. Should these grants be funded, we would be pleased to appoint a member of our association to your Brownfield Advisory Board.

Sincerely,


Colleen K. Cristel
Saltair Hills Neighborhood Council

November 19, 2011

November 15, 2011

RECEIVED

NOV 17 2011

Mr. Ben Wolters
Director
City of Kent
Economic and Community Development Department
220 4th Avenue South
Kent, WA 98032

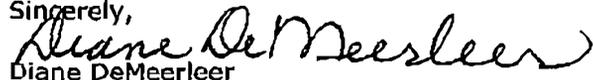
City of Kent
Office of the Mayor

Dear Mr. Wolters:

The Lakes at Kent Neighborhood Council is pleased to support efforts by the City of Kent to obtain funding from the U.S. EPA for community wide grants for assessment of hazardous substance and petroleum Brownfield's. These grants would be very valuable to the continuing efforts to clean and redevelop sites within the City that have been contaminated or idle. Our neighborhood is all too familiar with the impacts of contaminated sites, located between two legacy landfills owned by Seattle Public Utility. It is our hope these grants will help identify how these sites can be redeveloped and bring vital economic development to our neighborhood.

We look forward to embracing these opportunities and collaborating with the City on projects generated by these grants. Should these grants be funded, we would be pleased to appoint a member of our association to your Brownfield Advisory Board.

Sincerely,



Diane DeMeerleer

The Lakes at Kent Neighborhood Council

Attachment D: Special Considerations Checklist

Appendix 3

Special Considerations Checklist

Please identify (with an *X*) if any of the below items apply to your community or your project as described in your proposal. EPA will verify these disclosures prior to selection of the grant.

- Community population is 10,000 or less
- Federally recognized Indian tribe
- United States territory
- Applicant assisting a Tribe or territory
- Targeted brownfield sites are impacted by mine-scarred land
- Targeted brownfield sites are contaminated with controlled substances
- Community is impacted by recent natural disaster(s)
- Project is primarily focusing on Phase II assessments
- Community demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation
- Community experiencing plant closures (or other significant economic disruptions), including communities experiencing auto plant closures due to bankruptcy
- Applicant is a recipient of a HUD/DOT/EPA Partnership for Sustainable Communities grant

Attachment E: Additional Partner Letters of Support

- Seattle Public Utilities, Martin Baker, Deputy Director



City of Seattle
Seattle Public Utilities

November 23, 2011

Mr. Ben Wolters
Director
City of Kent
Economic and Community Development Department
220 4th Avenue South
Kent, WA 98032

RE: Letter of Support for the City of Kent's Application for U.S. EPA Grants
for Assessment of Brownfields

Dear Mr. Wolters:

The City of Seattle Public Utilities ("SPU") is writing this letter in full support of the City of Kent's efforts to obtain U.S. EPA grants for the assessment of Brownfields in the City of Kent, including properties owned by the City of Seattle that are located within the Kent City limits. SPU and the City of Kent have a history of cooperation and collaboration in addressing contaminated sites. The Seattle-owned Kent Highlands and Midway legacy landfills are located in Kent, and the two cities have developed a strong rapport over the years from working on these projects. In 2007, SPU worked with the City of Kent in developing a reuse planning report which identified development possibilities for these landfill sites. It is our hope that further assessment and investment at potential Brownfields sites will encourage and incentivize private redevelopment and transform currently fallow sites into productive properties.

We believe eliminating and redeveloping blighted, vacant, and contaminated properties is crucial to the economic and community development throughout the region. As this process continues, SPU looks forward to exploring the opportunities and collaborating with the City of Kent to put the Seattle-owned properties to productive use

Sincerely,

Martin Baker
Deputy Director
Corporate Strategies & Communications
Seattle Public Utilities

Ray Hoffman, Director
Seattle Public Utilities
700 5th Avenue, Suite 4900
PO Box 34018
Seattle, WA 98124-4018

Tel (206) 684-5851
Fax (206) 684-4631
TDD (206) 233-7241
ray.hoffman@seattle.gov

<http://www.seattle.gov/util>

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