
EXHIBIT E



EVERETT LANDFILL / TIRE FIRE SITE

**PUBLIC PARTICIPATION PLAN
FOR
CONSENT DECREE AND CLEANUP ACTION
PLAN**

March 2001

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1. INTRODUCTION AND OVERVIEW OF THE PUBLIC PARTICIPATION PLAN

1.1 Public Participation at Hazardous Waste Sites

Public participation is an integral element of the Model Toxics Control Act (MTCA), Chapter 70.105D Revised Code of Washington (RCW). The citizen-mandated hazardous waste cleanup law went into effect in March 1989. The implementing regulation, found in Chapter 173-340 of the Washington Administrative Code (WAC), prescribes the process and standards to identify, investigate, and clean up facilities where hazardous substances may be located. The law and associated regulations for implementation include requirements and guidelines for involving the public in the investigation and cleanup of hazardous waste sites.

Under Part VI WAC 173-340-600 of the regulations, a Public Participation Plan (PPP) is required for sites undergoing investigation and cleanup of hazardous substances that are conducted under the Washington Department of Ecology (Ecology) or its oversight. The plan must be updated for each new phase of work at the site.

The PPP is a document designed to provide a process for meaningful public participation during the technical studies and cleanup of a site. While certain aspects of the plan are prescribed by regulation, PPPs are developed to meet the needs of a specific community and to encourage participation by members of the community.

This PPP addresses public participation in the cleanup of the Everett Landfill/Tire Fire Site as it is today under existing conditions. This PPP also addresses public participation in cleanup activities that would be implemented under potential future developed conditions, where public access and site conditions may be different from their existing conditions.

The landfill is located southeast of the downtown Everett business district. The landfill is bounded by 36th Street to the north, Burlington Northern Santa Fe (BNSF) railroad tracks to the west and BNSF tracks to the east. Wetlands and the Snohomish River are east of both the landfill and the BNSF tracks. The old Simpson mill site is located south and southeast of the landfill. The size of the landfill is approximately 70 acres, of which approximately 66 acres have been used as a landfill.

1.2 Goal of this Public Participation Plan

The goal of this plan is to promote public understanding of the cleanup regulations and process and to encourage the public's meaningful participation in achieving a cleanup that is protective of human health and the environment. The actions in this plan will provide a channel for the public to be notified of, comment on, and assist in the cleanup process for the Everett Landfill/Tire Fire Site.

The main objectives of this plan are to:

- a) Promote public understanding of the cleanup and meaningful participation in the cleanup process.
- b) Ensure that people will be appropriately informed of the status of cleanup activities for the existing site conditions and of cleanup activities that would be a component of potential future development on the site.
- c) Solicit and respond to community concerns, questions, and comments during cleanup that will take place now and that which may take place in the future during development.

1.3 Public Participation for the Selection of Cleanup Actions

This Public Participation Plan has been prepared by Ecology and the owner of the landfill property, the City of Everett (City), with input from citizens in the nearby community. The PPP is an exhibit to a Consent Decree that sets forth the legal agreements that Ecology and the City will follow during the cleanup of the site. The Consent Decree contains several exhibits and accompanies two other related documents that are being issued for public comment.

These cleanup documents must be available for public comment for at least 30 days. (*See Section 4 of this Public Participation Plan for the methods for obtaining public comment on these documents.*)

Documents that are presented for public comment are listed below and defined in detail in the paragraphs that follow.

- Consent Decree
- Cleanup Action Plan (Exhibit C to the Consent Decree)
- Scope of Work and Schedule (Exhibit D to the Consent Decree)
- Public Participation Plan (Exhibit E to the Consent Decree)
- Restrictive Covenant (Exhibit F to the Consent Decree)
- Compliance Monitoring and Contingency Plan (attachment to the Cleanup Action Plan)
- Brownfield Feasibility Study (November 2000)
- State Environmental Policy Act (SEPA) Determination of Nonsignificance and associated SEPA checklist.

Consent Decrees are legal contracts signed by Ecology and the Potentially Liable Party (PLP) that contain the agreements to perform the cleanup actions.

Cleanup Action Plans are documents prepared under WAC 173-340-360 that select the cleanup actions and specify cleanup standards and other requirements for the cleanup actions. This cleanup action plan is a decision and summary document based on a technical report prepared under direction from Ecology, the Brownfield Feasibility Study (November 2000). The Cleanup Action Plan for the Everett Landfill/Tire Fire Site defines cleanup actions that must be accomplished at the site as it is in its present condition and cleanup actions that must take place under certain conditions if and when development takes place in the future.

Cleanup actions for both existing and future developed conditions address landfill gas, groundwater, direct contact exposure to humans, surface water, and administrative reporting and monitoring requirements. *(For requirements for existing conditions, see Sections 4.0 and 5.0 of the Cleanup Action Plan, Exhibit C, or the summary on page 4-5 of the Cleanup Action Plan. For requirements for future developed conditions, see Section 6.0 and 7.0 of the Cleanup Action Plan or the summary on pages 6-8 through 6-10 of the Cleanup Action Plan.)*

The **Scope of Work and Schedule** describes the specific activities required by the Cleanup Action Plan that will be completed and their schedules for completion. The Scope of Work and Schedule for the Everett Landfill/Tire Fire Site includes cleanup activities for existing site conditions and the process for coordinating City and Ecology reviews and approvals associated with cleanup action components of potential future development on the site.

Public Participation Plans are mandated by law and are prepared to encourage coordinated, effective, and meaningful public involvement. They are customized to meet the needs of the “potentially affected vicinity” or the people who are impacted by the contamination at a site and the cleanup of that contamination. Public Participation Plans contain the history and concerns of the people who live near a cleanup site. They describe the activities that Ecology and/or the PLP will conduct to make sure that the concerns of citizens are addressed and that citizens are able to be informed and to meaningfully participate in the cleanup activities. In these customized plans, public involvement activities are chosen to effectively address the concerns of the citizens.

The **Restrictive Covenant** is required by WAC 173-340-440 to assure the continued implementation of the remedial actions, as described in the Cleanup Action Plan. A Restrictive Covenant is recorded against the property title and will bind the property to the cleanup actions for the future.

The **Compliance Monitoring and Contingency Plan** describes monitoring requirements and contingency plans if monitoring shows an exceedance of cleanup standards. Monitoring and/or inspections are required for landfill gas, groundwater, surface water and direct contact prevention measures.

The **Brownfield Feasibility Study** presents information on the nature and extent of contamination and outlines the feasible alternatives for cleaning up the landfill for the current existing conditions as well as alternatives for cleanup actions associated with potential future redevelopment of the landfill property. The rationale for the choice of cleanup actions outlined in the cleanup action plan is contained in this document.

The City received a *Brownfields Assessment Demonstration Pilot Grant* from the EPA to evaluate reuse opportunities and constraints for the site. Brownfields are properties that are abandoned or underused because of environmental contamination from past industrial or commercial practices. The EPA grant program was established to assess brownfields sites and to test cleanup and redevelopment models. Under this grant, the City prepared a report called the *Landfill Site Development Considerations Report*. When the City approached Ecology regarding possibilities of developing the landfill property after cleanup, Ecology requested that a Brownfield Feasibility Study be prepared to address specific regulatory requirements under Washington State's cleanup regulation, the Model Toxics Control Act (MTCA).

A **Preliminary SEPA Determination of Nonsignificance** has been issued based on a SEPA checklist prepared for the Cleanup Action Plan. SEPA Determinations are required on all proposed cleanup actions. The City of Everett Planning Department is the lead SEPA agency for these proposed cleanup actions and has evaluated potential adverse impacts to the environment from these actions. The determination at this time is that there are no significant potential adverse impacts to the environment due to the proposed cleanup actions.

At this time, it is not known what future site development actions may be undertaken at the site. As a result, potential future site development actions, including the project specific cleanup action components (as required by the CAP) of potential future site development, are not evaluated in this SEPA environmental checklist. Independent SEPA evaluation would be required for any potential future site development and the project specific cleanup action components of any potential future development actions.

1.4 How the Cleanup Process Coordinates With Potential Development Processes

The Cleanup Action Plan describes cleanup actions that must occur under the landfill's existing land use and limited access conditions. Additionally, the Cleanup Action Plan describes cleanup actions that must occur if and when land use and/or public access conditions at the landfill site were to change in the future. For this reason, any potential development on the landfill site must be designed to meet cleanup requirements, and the City and Ecology must ensure that cleanup requirements are met.

This Cleanup Action Plan does not pre-approve nor require any development of the landfill site. Any potential future development proposal for the landfill site must obtain all necessary permits and approvals, just as any development proposal for a different, non-landfill site. **In addition to the regular permits and approvals**, the City and Ecology must conduct coordinated reviews and provide additional approval of the cleanup components of any proposed development on the landfill.

The following Figure 1 was originally developed for use at the May 5, 2000 public workshop. It is intended to graphically depict the various reviews, permits and approvals that may be applicable to any potential future development action on the landfill site and the former Simpson mill property (the Riverfront Sites). Please note that the Cleanup Action Plan, Consent Decree and Brownfield Feasibility Study are relative only to the Landfill/Tire Fire Site, and not the former Simpson mill property. Figure 1 depicts the additional review and approval processes that any potential future development on the landfill would require, as well as the normal review and approval processes for development not specific to the landfill. Names and organizations appearing in italics below boxes describe the regulatory authorities and responsibilities associated with the activities inside the box.

The “**Land Use Planning and Brownfield Process**” refers to City and citizen activities regarding Everett's Comprehensive Plan and Shoreline Master Plan. The EPA *Brownfields Assessment Demonstration Pilot Grant* awarded to the City for the evaluation of reuse opportunities at the Riverfront Sites is also depicted in this planning process portion of the diagram.

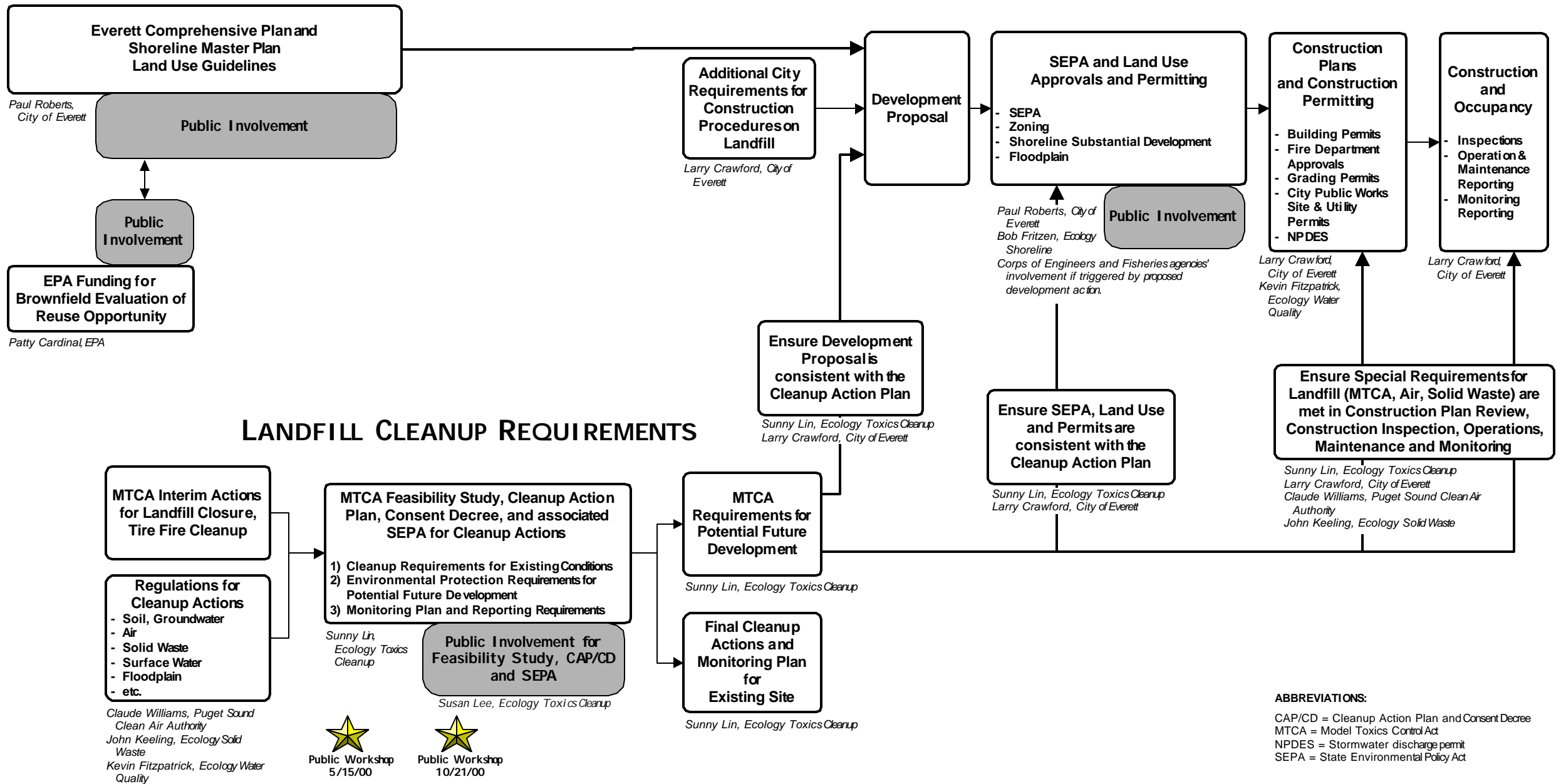
In the “**Riverfront Sites – Future Development Proposals**” area of the diagram, normal City, State and federal reviews, permitting and approval processes are shown, from left to right, beginning with the *Development Proposal* box. Any proposed development on either the landfill or the Simpson mill site would be required to go through this process. Potential development on the landfill may be subject to additional City requirements for construction procedures, to be determined by the City.

The “**Landfill Cleanup Requirements**” portion of the diagram refers to work completed for the landfill property under the Model Toxics Control Act (MTCA). This includes cleanup measures completed as Interim Actions as well as the Brownfield Feasibility Study, Cleanup Action Plan and Consent Decree work efforts. Cleanup requirements described in the final Cleanup Action Plan for existing conditions will be implemented at the site in accordance with the Scope of Work and Schedule (See Exhibit D). Final cleanup requirements for potential future development are also included in the final Cleanup Action Plan and will be implemented as a component of all future development on the site. The additional review and approval processes for development on the landfill, which will ensure that cleanup requirements are met, are depicted by the arrows connecting *MTCA Requirements for Potential Future Development* to each of the four boxes of normal City, State and federal reviews, permits and approvals.

Formal **Public Involvement** requirements are shown associated with specific actions, documents or milestones. Please note that the current public comment period is the only opportunity citizens have to comment on the cleanup requirements described in the Cleanup Action Plan for both existing and future conditions. Further public participation will occur through standard permit and approval processes, as well as through the provisions contained in this Public Participation Plan.

LAND USE PLANNING AND BROWNFIELD PROCESS

RIVERFRONT SITES - FUTURE DEVELOPMENT PROPOSALS



EVERETT LANDFILL/TIRE FIRE SITE AND SIMPSON PROPERTY (RIVERFRONT SITES) CLEANUP AND REDEVELOPMENT PROCESS November 10, 2000 **Figure 1**

2. SITE BACKGROUND

From 1917 to 1974, the landfill site was used as a burn dump, a scrap metal recycling and burial yard, and a municipal landfill. In 1975, the site was graded, covered with 12 inches of soil and seeded, which closed the landfill under then current Regulations Relating to Minimum Functional Standards for Solid Waste Handling (WAC 173-301). Beginning in 1977, a commercial recycling operation stored old rubber tires at the site. In 1983 and again in 1984, fires occurred in the piles of used rubber tires on the landfill. The fires, involving approximately one million tires, were allowed to burn themselves out, leaving several acres of ash. The residue and ash from these fires caused Ecology to request that the City perform an environmental characterization of the tire fire ash. The City conducted a preliminary assessment in 1985 and a Remedial Investigation and Feasibility Study (RI/FS) in 1986.

In 1989 under the new Model Toxics Control Act, the site was listed and ranked on Ecology's Hazardous Sites List. This listing was based on the presence of tire fire ash, not because the site is a closed municipal landfill. In 1990, Ecology and the City of Everett signed a Consent Order that required the City to conduct ash sampling and investigation of tire fire site. As investigations progressed, it became apparent that the landfill itself, as well as the tire fire ash, was a source of contamination on the site. These investigations were completed in 1993.

In 1994, Ecology required the City to supplement their investigations in order for Ecology to complete a cleanup action plan. The supplemental investigations included investigating landfill gas, gathering information to determine an appropriate landfill cover, and evaluating a proposal to treat the tire fire ash. Ecology also required the City to install a leachate collection system and surface water controls as Interim Actions.

The first Interim Action, in 1995, improved site grading and the control of surface water. The entire site (except for the two tire fire areas) was graded to allow the collection and control of surface water and to reduce leachate generation, and an additional two feet of soil cover was placed over the waste areas. In 1997-1998, as a second Interim Action, the leachate collection system and site fencing were installed, and the tire fire ash area was covered with two feet of clean soil. This was deemed appropriate by Ecology because the tire fire ash was no longer classified as dangerous waste under the new Dangerous Waste Regulations (Chapter 173-303 WAC, amended November 1996).

Ecology prepared a draft Cleanup Action Plan in the spring of 1999. This Draft Cleanup Action Plan did not anticipate future site redevelopment.

In 1998, the City received a U.S. Environmental Protection Agency *Brownfields Assessment Demonstration Pilot Grant* to evaluate redevelopment requirements for the former landfill and adjacent Simpson properties. Under this grant, the City produced a summary of existing conditions, performed a geotechnical investigation of the site, and produced a preliminary

evaluation of requirements that would be necessary to allow potential future redevelopment consistent with the Comprehensive Plan, while ensuring the environmental integrity of the site. The report was called the *Landfill Site Development Considerations Report*. This preliminary evaluation of environmental requirements for site redevelopment was reviewed with Ecology. Ecology then requested that a Brownfield Feasibility Study be prepared to address specific regulatory requirements under Washington State's cleanup regulation, the Model Toxics Control Act (MTCA). The Brownfield Feasibility Study supports definition of environmental cleanup requirements in the Cleanup Action Plan that could anticipate future site redevelopment.

The completed draft Cleanup Action Plan and related documents, including this Public Participation Plan, are being issued for public comment.

3. COMMUNITY BACKGROUND

3.1 Community Profile

Because of their location relative to the landfill, the Lowell neighborhood has had the most interest and been the most active community during Everett Landfill/Tire Fire Site activities and during the environmental investigations and plans for cleanup. The landfill is located along the lowlands adjacent to the Snohomish River, and this small neighborhood is located directly across a railroad track that forms a boundary for the landfill. It is a community with definite boundaries and is almost isolated from other neighborhoods. The landfill and river form the east boundary of the neighborhood and the eight-lane Interstate-5 freeway forms the west boundary. At this time, only one road exits the neighborhood to the south into rural lands. Limited roads also exit north by the landfill under the freeway to the rest of the City of Everett. The houses of the neighborhood are above the river lowlands on a rising hill. The neighborhood is not only adjacent to, but also elevated from the river so that the visual sight of the landfill and other riverfront properties is part of the everyday lives of the people who live in the Lowell Neighborhood.

The Port Gardner Neighborhood on the other side of the freeway and further uphill has also had an interest in the landfill, although not as intensive. Additionally, citizens from other parts of Everett have participated in landfill site related activities based on their interests in environmental health and shoreline properties of the city at large.

The people of the local neighborhoods have been involved in riverfront activities, of which the landfill/tire fire area is an integral part, for many years. Since 1979, their involvement has included participation in multiple actions related to the site and vicinity, including: growth management planning; site use determinations; comprehensive plan designation; utility construction; environmental interim actions; transfer station relocation planning; and shoreline master planning.

Ecology has held two public meetings during the last year related to the site cleanup process. In May 2000, Ecology held a well-attended public workshop to clarify the roles and responsibilities of the various agencies involved in the cleanup and redevelopment of the landfill and the riverfront properties and to inform citizens how they can participate in these processes. In October 2000, a workshop was held to receive input on the public participation plan.

3.2 Community Concerns

Information has been compiled since 1993, regarding the concerns of the people who live near the landfill or whose homes look out on the landfill or who pass the landfill daily. The information has been gathered by: surveys, both by telephone and in person; public meetings; mailed fact sheets; public comment periods; neighborhood meetings; personal conversations by

telephone, email, and in person; and workshops. The most recent workshop took place on Saturday, October 21, 2000, for the purpose of gathering information for this Public Participation Plan.

Citizens from both the local and city-wide communities have participated in these information gathering processes, and have communicated a wide range of issues and concerns, suggestions, and support.

Many of the concerns raised by the local community have been focused on land use and natural resource concerns related to potential riverfront property redevelopment. It has been acknowledged that the cleanup of the landfill is related to existing conditions and potential future development of the landfill property only and not to the development of the riverfront properties. The landfill cleanup documents do not require development of the landfill site in order to meet cleanup standards. Separate opportunities for public involvement on potential riverfront site development are described in Section 1.4 and Figure 1 of this document.

Specific issues related to landfill cleanup that have been raised by selected community members, and documented by Ecology, include:

- Concern that the City has prevented them from having meaningful participation in the environmental activities along the riverfront properties.
- Concern that City has withheld information, and concern regarding the credibility of information received from the City.
- Concern that Ecology has sanctioned the City's actions and discouraged public participation.
- Concern regarding length of time for tire fire ash and landfill cleanup.
- Support for cleanup actions, and encouragement for continued cleanup actions to move forward expeditiously.
- Concern regarding leachate from landfill and tire fire ash going into the river.
- Request for a strong public participation plan that allows citizens to obtain information on actions at the landfill BEFORE the actions are taken.
- Request to give citizens time to read documents with care and respond with assurances that their comments have actually been thoughtfully considered.
- Request that Ecology do the essential oversight of cleanup to make sure the City does what it agrees to.
- Concern that the City constructed the animal shelter and a super compactor on the site before cleanup.
- Concern regarding human health and quality of life.
- Concern regarding aesthetics of their neighborhood.
- Concern regarding methane gas leaving the site.
- Concern regarding health issues with other gases like hydrogen sulfide.

4. PUBLIC PARTICIPATION ACTIVITIES

4.1 Introduction

The following activities are planned to provide people the opportunity to access information during the cleanup of the site and have meaningful participation, both for cleanup activities related to existing conditions, and for cleanup actions conducted during potential future site development. The activities listed here are either required by law, offered by the City, or requested by the citizens.

4.2 Public Contacts

Department of Ecology

- Sunny Lin, Site Manager
3190 160th Avenue SE
Bellevue, WA 98008-5452
425-649-7187
hlin461@ecy.wa.gov
- Susan Lee, Public Involvement
3190 160th Avenue SE
Bellevue, WA 98008
425-649-7213
slee461@ecy.wa.gov

City of Everett

- Larry Crawford, Project Manager
3200 Cedar Street
Everett, WA 98201
425-257-8800
lcrawford@ci.everett.wa.us

4.3 Ecology Activities and Responsibilities

4.3.1 A public comment period of 60 days will take place from December 4, 2000 to February 1, 2001. Comment will be taken on the following documents:

- Consent Decree
- Cleanup Action Plan (Exhibit C to the Consent Decree)
- Scope of Work and Schedule (Exhibit D to the Consent Decree)
- Public Participation Plan (Exhibit E to the Consent Decree)
- Restrictive Covenant (Exhibit F to the Consent Decree)
- Compliance Monitoring and Contingency Plan (attachment to the Cleanup Action Plan)
- Brownfield Feasibility Study
- State Environmental Policy Act (SEPA) Determination of Nonsignificance and associated SEPA checklist

4.3.2 Public notice of the comment periods will be given, using the following methods:

- A **fact sheet** describing the activity and how the public may comment. The fact sheet will be mailed to all addressees on the Ecology mailing list. The list contains residents and property owners of the area and other interested community members.
- A **display ad** will be placed in the *Everett Herald* and the *Everett Tribune*.
- A **notice** will be published in Ecology's *Site Register*.
- A **notice** will be published in Ecology's *SEPA Register*.

4.3.3 Information repositories will assure that the community has access to relevant documents at the following locations:

- **Everett Public Library**
2702 Hoyt Street
Everett WA 98201
425-259-8000
 - ❖ All major documents
 - ❖ Hours:
Monday & Tuesday, 9 a.m. to 9 p.m.
Wednesday, noon to 9 p.m.
Thursday through Saturday, 10 a.m. to 6 p.m.
Sunday, 1 p.m. to 5 p.m.

- **Department of Ecology**
3190 160th Avenue SE
Bellevue WA 98008
425-649-7190
 - ❖ All major documents and complete project records
 - ❖ Weekdays 8 a.m. to 5 p.m.

4.3.4 A public hearing will be held during the public comment period to describe the documents and answer questions from the community on the documents. The hearing will be held Thursday, January 11, 2001 at the Everett Senior Center (3025 Lombard) from 6:30 – 8:30 p.m. A reminder will be published in the Herald and Tribune newspapers.

4.3.5 A responsiveness summary will be prepared following the public comment period that addresses the comments. The responsiveness summary will be available at the information repositories listed above.

4.4 City Activities and Responsibilities

4.4.1 Web Site

The City of Everett has an existing web site. That web site will include a section on the cleanup activities and the following information:

- The Cleanup Action Plan, Scope of Work and Schedule, Compliance Monitoring Plan and Public Participation Plan.
- All reports submitted to Ecology under the agreements in the Consent Decree and Cleanup Action Plan, including reporting required under the Compliance Monitoring Plan.
- All reports submitted to Ecology regarding the status of development.

The reports listed above, that will be posted on the web site, include data and mapping for both existing and future conditions regarding: perimeter gas conditions and monitoring results, groundwater monitoring results, surface water monitoring results, building and developed site gas monitoring results and reports of gas alarms if applicable.

4.4.2 Notification to Neighborhood Organizations

There are a number of conditions that may happen regarding which the City is required to notify Ecology. For these conditional reporting requirements, the City will also notify the Lowell and the Port Gardner Neighborhood Organizations by telephone or by email within one week of occurrence or confirmation. These conditions are:

- Confirmed “out-of-compliance” conditions for perimeter gas migration, groundwater or surface water, consistent with the Compliance Monitoring Plan.
- Accidental release of contaminants to groundwater or surface water due to events such as earthquake, flood, construction, etc.
- Notification of permit application for specific gas discharge points, if applicable
- Results of shallow aquifer characterization for potential restrictions on pile foundations
- Notification of the intent to transfer properties prior to a transfer.
- Notification of SEPA/permitting public comment periods for development actions that will trigger the cleanup actions prior to the comment period and provide the documents at the library information repository.
- Notification and stop work for any activities performed on the site that are not allowable under the restrictive covenant for the site.

4.4.3 Library Information Repository

The City will place all major documents in the Everett Public Library in the official information repository for this site. These documents include all reports submitted to Ecology under the agreements in the Consent Decree and Cleanup Action Plan and all reports submitted to Ecology regarding the status of cleanup actions, monitoring and development.

4.4.4 Neighborhood Meetings

The designated City contact will be available to attend neighborhood meetings upon request and will give updates on the status of cleanup activities.

4.4.5 Citizen’s Public Involvement Committee

At the discretion of community members, the community may establish a committee of neighborhood representatives focused on monitoring cleanup activities. If such a committee were formed, the designated City contact would be available to attend committee meetings upon request and give updates on the status of cleanup activities.

4.5 Public Participation Grant Activities

Citizens of the Lowell and Port Gardner Neighborhoods are applying for a Public Participation Grant from Ecology. Additional public participation activities may be defined under the scope of such a grant. Those additional activities would not reduce the scope of required public involvement activities defined by this plan. Activities conducted under this plan would be conducted to coordinate with potential additional activities defined under the grant.