



DEPARTMENT OF
ECOLOGY
State of Washington

Redevelopment Opportunity Zones & Brownfield Redevelopment Trust Fund Accounts in Washington State: 2013–2017

Toxics Cleanup Program

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For more information contact:

Toxics Cleanup Program
P.O. Box 47600
Olympia, WA 98504-7600

Phone: 360-407-7170

Washington State Department of Ecology

www.ecology.wa.gov

- | | |
|---------------------------------------|--------------|
| ○ Headquarters, Olympia | 360-407-6000 |
| ○ Northwest Regional Office, Bellevue | 425-649-7000 |
| ○ Southwest Regional Office, Olympia | 360-407-6300 |
| ○ Central Regional Office, Yakima | 509-575-2490 |
| ○ Eastern Regional Office, Spokane | 509-329-3400 |

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Acronyms and Abbreviations

Acronym or Abbreviation	Definition
BRTFA	Brownfield Redevelopment Trust Fund Account
CSID	Cleanup Site ID
ELSA	Environmental Legacy Stewardship Account
HST	Hazardous Substance Tax
LTCA	Local Toxics Control Account
MTCA	Model Toxics Control Act
RCW	Revised Code of Washington
ROZ	Redevelopment Opportunity Zone
STCA	State Toxics Control Account
TCP	Toxics Cleanup Program
WAC	Washington Administrative Code

Glossary

Term	Definition
biennium	A period of two years. The State of Washington operates on a two year (biennial) budget cycle that starts July 1 st of each odd-numbered year, and ends June 30 th of the next odd-numbered year. The 2015–17 Biennium starts July 1, 2015, and ends June 30, 2017.
brownfield property	<p>Previously developed and currently abandoned or underutilized real property and adjacent surface waters and sediment, where environmental, economic, or community reuse objectives are hindered by the release or threatened release of hazardous substances that Ecology has determined requires remedial action under this chapter or that the U.S. Environmental Protection Agency (EPA) has determined requires remedial action under the federal cleanup law (RCW 70.105D.020).</p> <p>Examples of brownfields undergoing transformations include Seattle's Mount Baker Housing Project (CSID 13054), Wenatchee's Worthen Street Landfill (CSID 4085), and Aberdeen's Seaport Landing (CSID 4987).</p>
Brownfield Redevelopment Authority	A city, county, or port district may establish by resolution a brownfield renewal authority for the purpose of guiding and implementing the cleanup and reuse of properties within a designated redevelopment opportunity zone. Such authorities are eligible to receive funds from the Brownfield Redevelopment Trust Fund Account (RCW70.105D.160).
Brownfield Redevelopment Trust Fund (BRTF) Account	An account that allows public moneys (state and local), as well as private and/or non-profit moneys, to be combined and set aside for cleaning up brownfields located within a redevelopment opportunity zone. The local governments designating the zone are the beneficiaries of the moneys. Moneys may be spent only after appropriation by the Legislature and approval by Ecology. Local governments must meet the eligibility and other requirements for remedial actions grants codified in Chapter 173-322A WAC . The account retains interest (RCW 70.105D.140).
cleanup actions	Also known as cleanups or remedial actions. The collective planning, investigative, and technical work needed to clean up contaminated sites.

Term	Definition
cleanup site	Also known as a contaminated site or hazardous waste site. A hazardous waste site is defined in MTCA as any site that Ecology has confirmed a release or a threatened release of a hazardous substance requiring remedial action (WAC 173-340-200). Ecology has identified 12,600-plus cleanup sites in Washington state. Cleanups are often considered to be construction projects that remove or immobilize harmful contamination from our environment and put properties back into use. Cleanup sites can be as small as a gas station spill, or as large and complex as the Tacoma Smelter Plume (CSID 3657) that impacts thousands of acres.
Cleanup Site ID (CSID)	An identifying number assigned to a cleanup site by the Toxics Cleanup Program for the Integrated Site Information System (ISIS).
Cleanup Site Search	Toxics Cleanup Program’s searchable database containing the 12,600-plus confirmed or suspected contaminated sites in Washington: https://fortress.wa.gov/ecy/gsp/SiteSearchPage.aspx
contaminated site	Also known as a cleanup site or hazardous waste site. A hazardous waste site is defined in MTCA as any site that Ecology has confirmed a release or a threatened release of a hazardous substance requiring remedial action (WAC 173-340-200).
Environmental Legacy Stewardship Account (ELSA)	An account that provides funds to Ecology and other state agencies having responsibility for cleaning up contaminated sites, improving hazardous waste management, and preventing future contamination. After revenue in the amount of \$140 million is placed in the STCA and LTCA accounts each fiscal year, the remaining funds are deposited in the ELSA account.
fiscal year	A period of one year named for the year it ends. Fiscal Year 2017 starts July 1, 2016, and ends June 30, 2017.
hazardous waste site	Also known a cleanup site or contaminated site. Defined in MTCA as any site that Ecology has confirmed a release or a threatened release of a hazardous substance requiring remedial action (WAC 173-340-200).
Hazardous Substance Tax (HST)	The source of revenue for State Toxics Control (STCA), Local Toxics Control (LTCA), and the Environmental Legacy Stewardship (ELSA) Accounts. This is a tax on hazardous substances at their first possession in the state of Washington. Currently, the majority of the revenue is generated from petroleum products and the remaining from pesticides, industrial chemicals, acids, and other hazardous substances. By statute, 56% of the Hazardous Substance Tax is deposited in the STCA. The other 44% is deposited in the LTCA. After deposits to both accounts equal in total \$140 million each fiscal year, those additional revenues are placed in ELSA.

Term	Definition
Integrated Site Information System (ISIS)	Toxics Cleanup Program's internal database that tracks Washington's 12,600-plus contaminated sites.
Local Toxics Control Account (LTCA)	An account to provide grants or loans to local governments. Grant programs historically funded from this account include Remedial Action, Coordinated Prevention, Public Participation, Centennial Clean Water, and Stormwater grants.
Model Toxics Control Act (MTCA statute)	Washington's environmental cleanup law, Chapter 170.105D RCW
Model Toxics Control Act Regulations (Cleanup rule)	Washington's regulations for cleaning up upland and sediment sites under the Model Toxics Control Act (Chapter 173-340 WAC)
Model Toxics Control Accounts	Three accounts used for cleanup activities and programs, comprised of the State Toxics Control Account (STCA), Local Toxics Control Account (LTCA), and Environmental Legacy Stewardship Account (ELSA).
MTCA Biennial Report of Expenditures	Ecology's financial report produced every odd-numbered year that describes how funds from the MTCA Accounts were spent on cleanup activities over the previous two fiscal years. Available at https://ecology.wa.gov/About-us/Get-to-know-us/Our-Programs/Toxics-Cleanup/TCP-Legislative-reports
MTCA Ten-Year Financing Report	Ecology's financial report produced every even-numbered year that describes cleanup financing needs over the next ten fiscal years. Available at https://ecology.wa.gov/About-us/Get-to-know-us/Our-Programs/Toxics-Cleanup/TCP-Legislative-reports
RAG Program	Ecology's Remedial Action Grant program that provides grants and loans to local governments for site investigation and cleanup.
RAG Rule	Washington's regulations that govern the issuance of remedial action grants and loans to local governments (Chapter 173-322A WAC).
Redevelopment Opportunity Zone (ROZ)	A geographic area designated by a city, county, or port district that meets criteria outlined in RCW 70.105D.150 . The city, county, or port district must also adopt a resolution that includes the determinations and commitments outlined in the RCW.
remedial actions	Also known as cleanups or cleanup actions. The collective planning, investigative, and technical work needed to clean up contaminated sites.

Term	Definition
Remedial Action Grants (RAG)	Grants for cleaning up hazardous sites throughout Washington. In 2015–17, Ecology offered six types of remedial action grants through the RAG Program: Oversight, Independent, Integrated Planning, Site Hazard Assessment, Area-wide Groundwater, and Safe Drinking Water.
State Toxics Control Account (STCA)	An account used to carry out state agency efforts to implement the Model Toxics Control Act including support for toxic cleanup; toxic pollution prevention; hazardous and solid waste management; and other water and environmental health monitoring programs. The STCA also earns revenue through Cost Recovery and the Voluntary Cleanup Program (VCP). Other revenues include fines and penalties issued against persons or businesses that have not complied with environmental contamination and cleanup laws.
upland site	A contaminated site on land or in groundwater.
What's in My Neighborhood	Toxics Cleanup Program's interactive map of cleanup sites in Washington. https://fortress.wa.gov/ecy/neighborhood/

Executive Summary

Washington State’s Department of Ecology (Ecology’s) Toxics Cleanup Program (TCP) manages or oversees contaminated site cleanups conducted under our state’s environmental cleanup law, the Model Toxics Control Act (MTCA), [Chapter 70.105D RCW](#). MTCA cleanups protect people’s health by removing toxic chemicals from the environment, such as arsenic from playground soil or methane gas from a solid waste landfill. MTCA cleanups help our state’s residents, wildlife, and economy thrive.

In 2013, amendments to MTCA established three tools intended to help local governments clean up brownfield sites: 1) Redevelopment Opportunity Zones (ROZs), 2) Brownfield Renewal Authorities, and 3) the Brownfield Redevelopment Trust Fund Account. A brownfield site is an abandoned or underused property where reuse or redevelopment is hindered by the release (or threatened release) of hazardous substances, such as might occur at a former dry cleaners or an abandoned gas station.

Since 2013, three local governments have created three redevelopment opportunity zones (ROZ) and one brownfield renewal authority in Washington state. However, no brownfield redevelopment trust fund accounts have been established to support those activities.

This report examines how the ROZs were created and assesses possible reasons why the trust fund accounts have not been used. Specifically, this report presents:

- The requirements for establishing a ROZ;
- Local governments’ and Ecology’s authority within a ROZ;
- An overview of Washington’s first three ROZs (Spokane, Bellingham, and Seattle);
- The use of mixed funding agreements within a ROZ using moneys from the State Toxics Control Account (STCA); and
- Three possible reasons why there are currently no moneys in the Brownfield Redevelopment Trust Fund Account—impediments that may be deterring local governments’ efforts to create a ROZ or contribute to the account for cleaning up their brownfields located within the ROZ:
 - Due to MTCA’s revenue shortfall, the state has been unable to financially participate in the funding of brownfield cleanups within ROZs;
 - Conditions for creating a ROZ limit local governments’ ability to establish the zones; and
 - The design of the BRTF Account inhibits contributions from local governments.

Section 1.0 Background

The Toxics Cleanup Program (TCP) oversees or manages most cleanups in Washington. TCP has primary responsibility for implementing and enforcing MTCA, and develops the rules and guidelines that govern cleanups. TCP manages the Remedial Action Grant program that funds cleanups by local governments. It also manages the Brownfields program, whose staff work with local governments to facilitate the cleanup and redevelopment of brownfields.

The Brownfield Redevelopment Trust Fund (BRTF) Account serves as a type of financial mechanism within a specific geographic area designated by local governments known as a redevelopment opportunity zone (ROZ). The mechanism allows public moneys (state and local), as well as private or non-profit moneys, to be set aside for cleaning up brownfields located within a ROZ. The local governments that designate a ROZ are the beneficiaries of the moneys. Moneys in the account may be spent only after appropriation by the Legislature and approval by Ecology. Local governments must meet the eligibility and other requirements for remedial actions grants codified in Chapter 173-322A WAC.

Section 2.0 Brownfield Redevelopment Trust Fund Accounts in Washington

Brownfields sites are previously developed properties that are currently abandoned or underused. They may have real or perceived environmental contamination that hinders a community's reuse objectives for the site. Restored brownfields help protect human health and environment, spur economic development, and provide housing or recreational opportunities.

Local governments already have a broad array of governance and financing tools to facilitate redevelopment—including brownfields redevelopment—within their communities. Several years ago, statutory changes to Washington's cleanup law, the Model Toxics Control Act (MTCA), provided additional tools to both state and local governments to aid in this redevelopment.

When the 2013 Legislature passed Second Engrossed Second Substitute Senate Bill 5296 (SB 5296), it authorized cities, counties, and port districts to establish "redevelopment opportunity zones" ([RCW 70.105D.150](#)). In general terms, these zones are envisioned as a way to focus local governments' and Ecology's resources within a limited geographic area, typically one containing multiple contaminated sites. The zone helps accelerate cleanups within the area so that redevelopment can occur more expeditiously. RCW 70.105D.150 specifies the requirements for establishing these zones.

2.1. Local and State Authority under the ROZ

Redevelopment opportunity zones and associated authorities are intended to supplement, not replace, existing local authorities.

Within these zones, *local governments* are authorized to:

- Create a "brownfield renewal authority" with broad powers to facilitate cleanup and redevelopment (see RCW 70.105D.160).
- Access a "brownfield redevelopment trust fund account," created within the state's budget, which can be used to secure long-term funding for cleanup (see RCW 70.105D.140).

Within these zones, *Ecology* is authorized to:

- Enter into agreed orders with prospective purchasers to accelerate the study of sites with redevelopment potential.
- Enter into mixed funding settlement agreements with prospective purchasers where public funding is commensurate with a public benefit other than cleanup.
- Prioritize grants for integrated planning and area-wide groundwater remedial actions within these zones.

Redevelopment Opportunity Zone (ROZ) is a geographic area designated by a city, county, or port district that meets the criteria outlined in [RCW 70.105D.150](#). An example criterion is, “at least fifty percent of the upland properties in the zone are brownfield properties.” The city, county, or port district must also adopt a resolution that includes the determinations and commitments outlined in this RCW.

2.2. Three Zones, One Renewal Authority since 2013

As of December 2017, three local governments have created redevelopment opportunity zones in Spokane, Bellingham, and most recently, Seattle. Spokane also created one brownfield renewal authority since the passage of SB 5296 in 2013. The attached Appendix provides copies of these ordinances.

The Cleanup Sites IDs (CSIDs) in the following section link to Ecology’s Cleanup Site Search, available at <https://fortress.wa.gov/ecy/gsp/SiteSearchPage.aspx>.

2.2.1. Spokane in 2015

The Spokane City Council established the first ROZ in May 2015. Council action established the **Hillyard Industrial Area Redevelopment Opportunity Zone**. This zone is comprised of four parcels representing approximately 10 acres in total. All properties within the zone are owned by the City of Spokane.

Simultaneously, City of Spokane’s legislative action created the **Hillyard Industrial Area Brownfield Renewal Authority**. This renewal authority area is contained within the larger Northeast Public Development Authority. The Board of Directors for the Northeast Public Development Authority also serves as Board of Directors for the Hillyard Industrial Area Redevelopment Opportunity Zone.

2.2.2. Bellingham in 2016

In April 2016, the City of Bellingham created by legislative action the **Bellingham Waterfront Redevelopment Opportunity Zone**. This zone is comprised of ten parcels representing approximately 200 acres. Properties within the zone are owned either by the City of Bellingham or the Port of Bellingham. The ROZ is adjacent to the Bellingham waterfront. It wraps around the Whatcom Waterway, extending southward to the South State Street Manufactured Gas Plant cleanup site ([CSID 4606](#)). Northward, it encompasses the Central Waterfront cleanup site (several sites under [CSID 3418](#)) to I & J Waterway ([CSID 2012](#)).

2.2.3. Seattle in 2017

The third redevelopment opportunity zone in the state was created by legislative action by the City of Seattle in February 2017. The **Mount Baker McClellan Street Redevelopment Opportunity Zone** ([CSID 13054](#)) is comprised of five parcels representing approximately one-half acre in the Mount Baker neighborhood. The parcels are owned by the Mount Baker Housing Association (MBHA). MBHA is a non-profit association devoted to the provision of affordable housing in the Mount Baker neighborhood.

2.3. No BRTF Accounts Established for ROZs

No brownfield redevelopment trust fund accounts have been established for any of these redevelopment opportunity zones. In Findings (Section 3.0 of this report), we present three possible reasons why no accounts have been established, i.e., impediments that may deter efforts to create a ROZ or contribute moneys.

2.4. Mixed Funding Agreements within ROZs under STCA

Ecology has entered into one mixed funding settlement agreement with a prospective purchaser, the Mount Baker Housing Association, for the cleanup of brownfield properties located within a redevelopment opportunity zone. As discussed above, MBHA has acquired property in the zone.

Washington's ability to participate in this type of funding arrangement is a unique feature of the 2013 MTCA amendments in SB 5296. One of those amendments was to [RCW 70.105D.070](#), which outlines how the hazardous substance tax is distributed to the State Toxics Control Account (STCA) and Local Toxics Control Account (LTCA), and how those accounts are used.

Before passage of SB 5296, Washington state could use revenue placed in the STCA to assist private, potentially liable parties only under limited circumstances. This assistance is commonly called a “mixed funding agreement.” Specifically, RCW 70.105D.070(3)(k) allows for:

Public funding to assist potentially liable persons to pay for the costs of remedial action in compliance with clean-up standards under [RCW 70.105D.030\(2\)\(e\)](#), but only when the amount and terms of such funding are established under a settlement agreement under [RCW 70.105D.040\(4\)](#) and when the director has found that the funding will achieve both:

- (i) A substantially more expeditious or enhanced cleanup than would otherwise occur; and
- (ii) The prevention or mitigation of unfair economic hardship.

Ecology has entered into eight such mixed funding agreements, all of which were during the early 1990s.

SB 5296 established another type of mixed funding agreement to assist private prospective purchasers. Specifically, RCW 70.105D.070(3)(q) allows for:

Public funding to assist prospective purchasers to pay for the costs of remedial action in compliance with clean-up standards under [RCW 70.105D.030\(2\)\(e\)](#) if:

- (i) The facility is located within a redevelopment opportunity zone designated under [RCW 70.105D.150](#);
- (ii) The amount and terms of the funding are established under a settlement agreement under RCW [70.105D.040\(5\)](#); and
- (iii) The director has found the funding meets any additional criteria established in rule by the department, will achieve a substantially more expeditious or enhanced cleanup than would otherwise occur, and will provide a public benefit in addition to cleanup commensurate with the scope of the public funding.

In February 2017, Ecology’s Director made a finding that all three above criteria outlined in RCW 70.105D 070(3)(q) were met at the Mount Baker McClellan Street Redevelopment Opportunity Zone ([CSID 13054](#)). In part, the Director found that public funding:

...will provide a public benefit in addition to cleanup commensurate with the scope of public funding. The Mount Baker neighborhood is one of Seattle’s most economically and culturally diverse neighborhoods. The properties within the site are currently underutilized, being occupied by, among other things, a vacant dry cleaning operation and a vacant gas/service station. MBHA’s proposed redevelopment involves providing approximately 150 new affordable housing units on these properties. The proposed new affordable housing units will address well-documented critical need for such housing in Seattle. [See Exhibit 2, Director’s Findings, later in Appendix of this report.]

Subsequent to this determination, the Department entered into a mixed funding agreement with MBHA to undertake the remedial investigation and feasibility study on the properties within the ROZ. The agreement provided partial funding to start this work. The bulk of the funding was provided in the agreed to (but not adopted) 2017–19 Capital Budget.

Without the adoption of a capital budget, this project cannot move forward and realize its promise.

Section 3.0 Findings

Ecology has identified three possible reasons there are no moneys in the Brownfield Redevelopment Trust Fund Account.

1. Due to MTCA's revenue shortfall, the state has been unable to financially participate in the funding of brownfield cleanups within ROZs, which is viewed as a significant impediment by local governments.
2. Conditions for creating a ROZ limit local governments' ability to establish the zones.
3. The design of the BRTF Account inhibits contributions from local governments.

3.1. Impediment No. 1: Lack of state participation limits interest in developing a ROZ.

MTCA's revenue shortfall since 2013 impacts the state's ability to fund cleanup projects that are located within redevelopment opportunity zones.

New MTCA authorities were established in 2013 to address brownfields redevelopment with MTCA account investments. Those changes were immediately followed by significant declines in MTCA revenues. This severely hindered the MTCA accounts' ability to support state-directed cleanup investments and remedial action grants for local governments.

Since the Model Toxics Control Act was established in 1988, MTCA funds have been used for both operating and capital investments in core toxics; hazardous waste; solid waste; air quality; and water and environmental health protection and monitoring programs. The three MTCA accounts together are the largest source of state funds supporting environmental and public health work at Ecology.

The major source of funding for these accounts is the Hazardous Substance Tax (HST), a 0.7 percent tax on the wholesale value of the first possession of hazardous substances in Washington. Since the summer of 2014, Ecology has been managing a shortfall in the MTCA accounts. The primary drivers of this shortfall include:

- Reduced value of crude oil. Barrel prices were \$104 in the summer of 2014, and dropped to below \$30 in January 2016. Since the February 2014 revenue forecast, actual and projected revenue declined by \$388 million (\$187 million in 2015–17, \$201 million in 2017–19);

- \$240 million in appropriations above projected fund balances that assumed spending would occur in future biennia (\$119 million in 2013–15, and \$121 million in 2015–17). These future commitments are now due, and significantly reduce available fund balance capacity;
- MTCA appropriations have expanded in recent biennia to several agencies (an increase from five agencies in 2003–05 to eleven agencies today);
- Enacted budgets included up to \$26 million in loans to MTCA from other dedicated accounts, with repayments due in the next two biennia and;
- Since 2007–09, \$75 million of work previously funded by General Fund-State has been permanently shifted to MTCA (\$64 million at Ecology, \$11 million at other agencies.)

The enacted 2015–17 and 2017–19 biennial budgets have included interim solutions to keep positive balances in the MTCA accounts. These interim solutions have not fully funded the Remedial Action Grant (RAG) program, which include oversight, independent, area-wide groundwater, and integrated planning grants.

3.2. Impediment No. 2: Conditions limit local government’s ability to establish a ROZ.

Local governments are limited by the conditions required to create a redevelopment opportunity zone.

During the passage of SB 5296, there was extensive discussion about the mechanism to designate the redevelopment opportunity zone. In initial drafts, the ROZ was simply a geographic designation by local government action. However, concerns were expressed that the designation of the ROZ as a brownfield target might have detrimental impact on the value of private property located within the zone. Ultimately, the 2013 legislation retained the local legislative ability to create the geographic area, but added the provision requiring that owners of private property consent to be included within the zone.

The three ROZs created to date have only one or two property owners. In the Spokane ROZ, all of the properties are owned by the City of Spokane. In Bellingham, properties in the zone are owned either by the City or the Port. In Seattle, MBHA is the sole owner of the property within the ROZ.

The need to engage other property owners when creating the ROZ is ultimately dictated by the proposed zone's size and shape. The zone's size and shape become critical when considering, for example, infrastructure improvements and the project's ability to draw capital funds of significant quantity. When congruent properties exist under single ownership or aligned ownerships, sizing the zone appropriately may not be a problem. In more dense urban settings, however, an appropriately-sized ROZ may not be realized due to the resistance of multiple property owners, regardless of the wishes of the local government.

Washington state's financial participation can be a strong catalyst for other capital participants, which can create an incentive for reluctant property owners.

3.3. Impediment No. 3: Design of BRTF Account inhibits local government contributions

The design of the Brownfield Redevelopment Trust Fund Account does not incentivize contributions from local governments and private parties.

Money may be deposited into the BRTF Account voluntarily by local governments or by the Legislature, for use in redevelopment opportunity zones or by brownfield renewal authorities. Additionally, receipts from settlements or court orders directing payment to the account for a specific redevelopment opportunity zone to resolve liability under the Model Toxics Control Act can also be deposited in a BRTF Account. Settlements, such as from insurance or contribution settlements, are typical financial elements in brownfield redevelopment activities.

The BRTF Accounts were designed to take these funds from local, private and state sources. It is a legislatively appropriated account. Our state is currently experiencing funding shortfalls that are impacting accounts across every agency. While managing these shortfalls through policy choices, funds from the MTCA Accounts—like many others—are being redirected to uses other than originally intended. Local governments and parties who see this recently repeating pattern have less confidence that moneys placed into the BRTF Account will remain there.

Section 4.0 Conclusion

The Brownfield Redevelopment Trust Fund Account is one of several innovative changes made to Washington’s Model Toxics Control Act during the 2013 legislative session.

By design, the account works in conjunction with establishing a redevelopment opportunity zone. These zones—created by local government action and with consent from owners of private property within the zone—serve to focus and prioritize state investment in redevelopment work. The zones also allow the state to partner with private (including not-for-profit) parties to advance cleanup and redevelopment where there is a commensurate public benefit. This is a marked change from earlier definitions of mixed funding, when the state’s participation was directed solely to advance cleanup and ameliorate economic hardship to the site owner, without any consideration of the greater public benefit.

Three ROZs have been created. However, no BRTF Accounts have been established. This is principally because Washington state has not been in the position to reliably contribute to these accounts, due to the significant decline of revenue available to place into the State Toxics Control Account. The 2013 amendments to MTCA also created additional authorized uses of STCA funds that generated even more demands against a diminishing revenue stream.

The redevelopment opportunity zone and the brownfield redevelopment authority were legislatively established as mechanisms to prioritize and target cleanup funding through the LTCA and (to a lesser extent) through the STCA. The recent decline in MTCA revenue, combined with creating additional eligible uses for that revenue, has yielded little incentive to utilize BRTF Accounts.

In this report, Ecology has identified two additional impediments to using these tools: the conditions for creating a ROZ, and the appropriative nature of the BRTF Account. Unless the state is an active participant in this Account, however, those two impediments will remain secondary.

It will be extremely difficult for these accounts to be used in the foreseeable future unless the state can provide its share. Until the state can financially participate again by offering grants and loans, little incentive exists for local governments to use the tools of redevelopment opportunity zones, brownfield development authorities, and the Brownfield Redevelopment Trust Fund Account. Equally concerning is that these mechanisms were designed to create long-term strategic partnerships among state, local, and private (including non-profit) entities. Without the state’s strategic participation and ability to invest in these zones, and without the ability to encourage using these authorities and accounts, a critical partnership-building element is eliminated.

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Appendix A

Three Ordinances Establishing Redevelopment Opportunity Zones (ROZs) in Spokane, Bellingham, and Seattle (2015–2017)

**Hillyard Industrial Area Redevelopment Opportunity Zone,
Hillyard Industrial Area Brownfield Renewal Authority
(Spokane 2015)**

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05-26-15



Agenda Sheet for City Council Meeting of:
05/18/2015

Date Rec'd	5/5/2015
Clerk's File #	RES 2015-0051
Renews #	
Cross Ref #	
Project #	
Bid #	
Requisition #	

Submitting Dept	PLANNING & DEVELOPMENT
Contact Name/Phone	TERI STRIPES 625-6597
Contact E-Mail	TSTRIPES@SPOKANECITY.ORG
Agenda Item Type	Resolutions
Agenda Item Name	0650 - ESTABLISHMENT OF BROWNFIELD REDEVELOPMENT OPPORTUNITY

Agenda Wording

Resolution facilitating the establishment of the Brownfield Redevelopment Opportunity Zone and Brownfield Renewal Authority. Further to be resolved is the appointment of the Board of Directors of the Northeast Public Development Authority as the

Summary (Background)

The establishment of a Brownfield Redevelopment Opportunity Zone and Brownfield Renewal Authority will help guide and implement the cleanup and reuse of Brownfields in the Greater Hillyard Neighborhood. Whereas it is desired the Northeast Public Development Authority Board of Directors serve as the Hillyard Industrial Area Brownfield Renewal Authority Board of Directors to invest in community outreach, infrastructure, economic development partnerships, and land development decisions.

Fiscal Impact	Budget Account
Neutral \$	#
Select \$	#
Select \$	#
Select \$	#

Approvals		Council Notifications	
Dept Head	MEULER, LOUIS	Study Session	
Division Director	SIMMONS, SCOTT M.	Other	
Finance	SALSTROM, JOHN	Distribution List	
Legal	RICHMAN, JAMES	lhattenburg@spokanecity.org	
For the Mayor	SANDERS, THERESA	mhughes@spokanecity.org	
Additional Approvals		tstripes@spokanecity.org	
Purchasing		cbrazington@spokanecity.org	

ADOPTED BY SPOKANE CITY COUNCIL
on May 18, 2015
[Signature]
SPOKANE CITY CLERK



Continuation of Wording, Summary, Budget, and Distribution

Agenda Wording

Hillyard Industrial Area Brownfield Renewal Authority.

Summary (Background)

<u>Fiscal Impact</u>		<u>Budget Account</u>	
Select	\$		#
Select	\$		#

Distribution List

<u>Fiscal Impact</u>		<u>Budget Account</u>	
Select	\$		#
Select	\$		#

<u>Distribution List</u>	

RESOLUTION NO. 2015-0051

A resolution establishing the Hillyard Industrial Area Brownfield Redevelopment Opportunity Zone and the Hillyard Industrial Area Brownfield Renewal Authority.

WHEREAS, reforms to the State Model Toxics Control Act have created new tools to promote cleanup and redevelopment of brownfields; and

WHEREAS, RCW 70.105D.150 authorizes the City to designate a geographic area within the City boundary as a redevelopment opportunity zone upon the adoption of a resolution that provides for certain determinations and commitments; and

WHEREAS, RCW 70.105D.160 authorizes the City to establish by resolution a brownfield renewal authority for the purpose of guiding and implementing the cleanup and reuse of properties within a designated redevelopment opportunity zone; and

WHEREAS, the City has performed an analysis of City-owned property in the Hillyard area, hereinafter referred to as the Hillyard Industrial Area, and determined that based upon the definition of "brownfield property" set forth in RCW 70.105D.020 (3), the Hillyard Industrial Area property constitutes a brownfield property; and

WHEREAS, the City's analysis of the Hillyard Industrial Area, a copy of which is attached as Exhibit A, demonstrates that the criteria for a redevelopment opportunity zone designation set forth in RCW 70.105D.150 (1) has been met; and

WHEREAS, it is the desire of the City Council to adopt this resolution to establish the Hillyard Industrial Area Redevelopment Opportunity Zone pursuant to RCW 70.105D.150; and

WHEREAS, it is the desire of the City and the Northeast Public Development Authority (NE PDA) to have the NE PDA board of directors serve as the board of directors for the brownfield renewal authority pursuant to RCW 70.105D.160; - - Now, Therefore,

BE IT RESOLVED by the Spokane City Council that the geographic area identified in the map attached as Exhibit No. 2 shall be designed as the Hillyard Industrial Area Redevelopment Opportunity Zone (HIA ROZ) and that the HIA ROZ meets the following determinations as required by RCW 70.105D.150:

- (a) At least fifty percent of the upland properties in the HIA ROZ are brownfield properties as defined in RCW 70.105D.020 (3) whether or not the properties are contiguous;
- (b) The upland portions of the HIA ROZ are comprised entirely of parcels of property either owned by the city or whose owner has provided consent in writing to have their property included within the HIA ROZ;
- (c) The cleanup of the HIA ROZ, as brownfield properties, will be integrated with planning for the future uses of the properties and is consistent with the comprehensive land use plan for the HIA ROZ; and

(d) The proposed properties lie within boundaries of the City of Spokane and are within the urban growth area designated under RCW 36.70A.110.

BE IT FURTHER RESOLVED by the Spokane City Council that the Hillyard Industrial Area Brownfield Renewal Authority is hereby established pursuant to RCW 70.105D.160 for the purpose of guiding and implementing the cleanup and reuse of the properties with the Hillyard Industrial Area Redevelopment Opportunity Zone.

BE IT FURTHER RESOLVED by the Spokane City Council that the board of directors for the Hillyard Industrial Area Brownfield Renewal Authority shall consist of the board of directors of the Northeast Public Development Authority as it currently exists and as reconstituted from time to time by subsequent appointments. The Hillyard Industrial Area Brownfield Renewal Authority shall have those powers set forth in chapters 39.34 RCW and 70.105D RCW.

ADOPTED BY THE CITY COUNCIL ON

May 18, 2015

Sen Hyslop
City Clerk

Approved as to form:

Janna
Assistant City Attorney

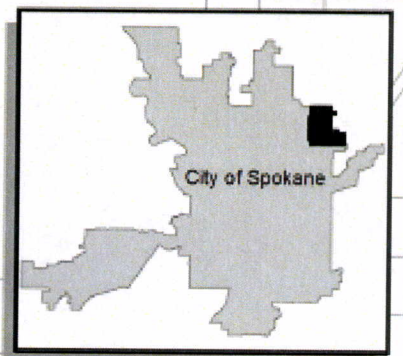


City of Spokane / NEFDA
 Hillyard Industrial Area Redevelopment Opportunity Zone Table--
 Property Eligibility

Property Owner	Parcel Identification	Size (acres)	Brownfield?	Brownfield Acres	Contaminated?	Site Name	Previously Developed?	Abandoned+Un- developed?	Abandoned or Vacant?	Underutilized?	Underutilized (CALC)	Land-Assessed Value	Building- Assessed Value
City of Spokane	36344.0206	4.26	TRUE	4.3	Y	The Ranch	Y	TRUE	N	Y	0.32	\$ 556,980	\$ 177,800
City of Spokane	36344.0210	1.64	TRUE	1.6	Y	The Ranch	Y	TRUE	N	Y	0.01	\$ 214,200	\$ 1,400
City of Spokane	36344.0208	2.05	TRUE	2.1	Y	The Ranch	Y	TRUE	N	Y	0.03	\$ 267,800	\$ 8,000
City of Spokane	36344.0204	2.07	TRUE	2.1	Y	The Ranch	Y	TRUE	N	Y	0.03	\$ 270,920	\$ 7,100

Summary Analysis		Total	Brownfields	% Brownfields
Parcels	4	4	100%	
Acres	10.02	10.02	100%	

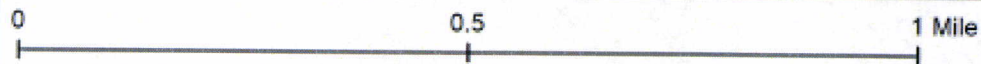
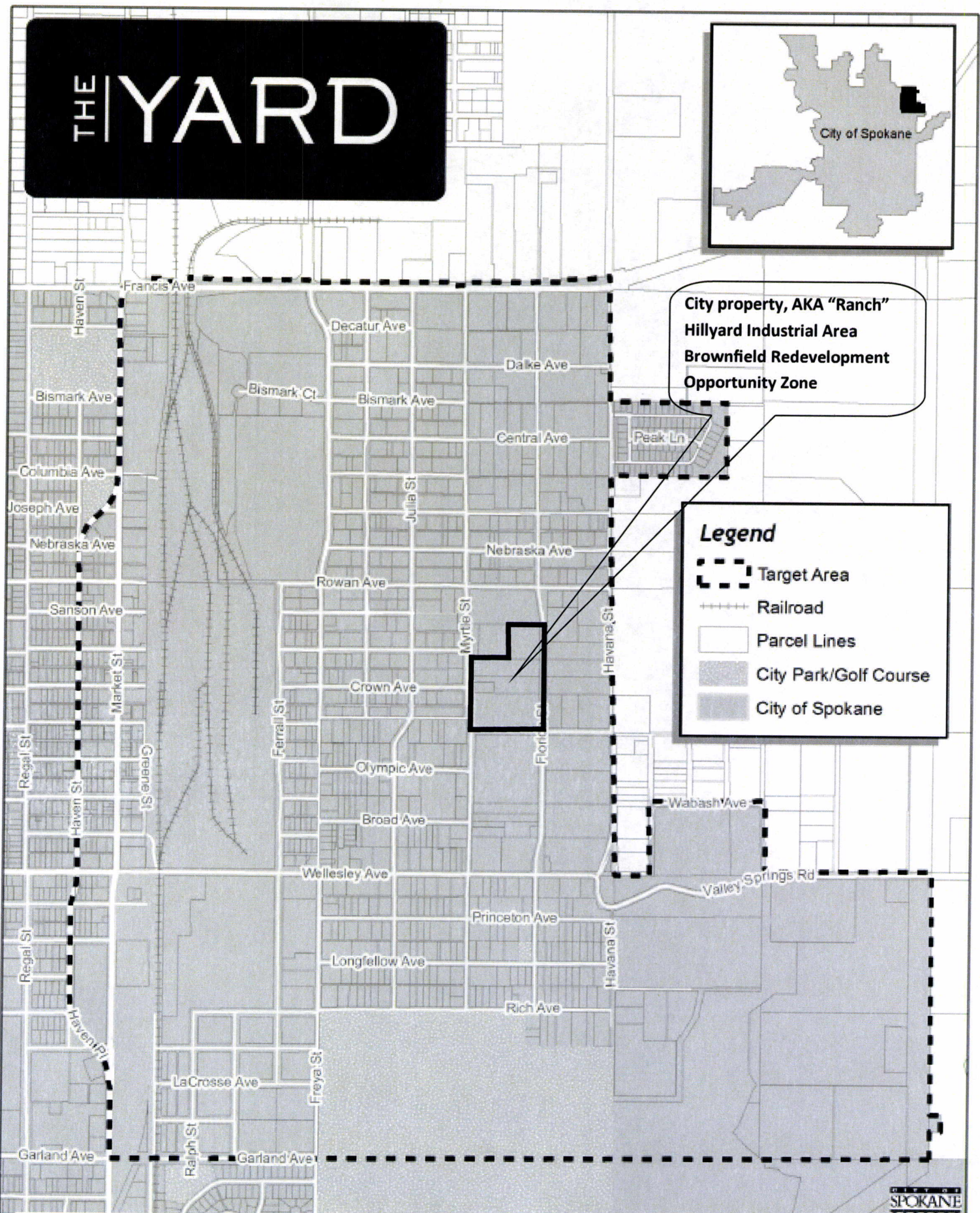
THE YARD



City property, AKA "Ranch"
 Hillyard Industrial Area
 Brownfield Redevelopment
 Opportunity Zone

Legend

- Target Area
- Railroad
- Parcel Lines
- City Park/Golf Course
- City of Spokane



Total Area:
 1.64 Square Miles



**Bellingham Waterfront
Redevelopment Opportunity Zone (Bellingham 2016)**

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RESOLUTION NO. 2016-08

RESOLUTION REGARDING ESTABLISHING THE BELLINGHAM
WATERFRONT REDEVELOPMENT OPPORTUNITY ZONE

WHEREAS, reforms to the State Model Toxics Control Act have created new tools to promote cleanup and redevelopment of brownfields; and

WHEREAS, RCW 70.105D.150 authorizes cities to designate a geographic area within their jurisdiction as a Redevelopment Opportunity Zone (ROZ) upon the adoption of a resolution that provides for certain determinations and commitments; and

WHEREAS, the City of Bellingham has performed an analysis of City of Bellingham and Port of Bellingham-owned property on or near the Bellingham waterfront and determined that based upon the definition of "brownfield property" set forth in RCW 70.105D.020(3), the area depicted on Exhibit A constitutes a brownfield property; and

WHEREAS, the City's analysis of the Bellingham Waterfront area demonstrates that the criteria for the redevelopment opportunity zone designation set forth in RCW 70.105D.150(1) has been met; and

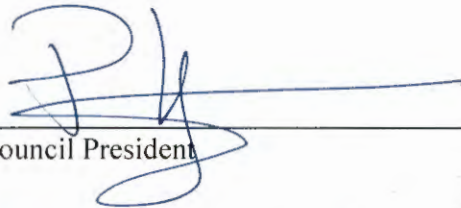
WHEREAS, it is the desire of the Bellingham City Council to adopt this resolution and establish the Bellingham Waterfront Redevelopment Opportunity Zone pursuant to RCW 70.105D.150;

NOW, THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF BELLINGHAM:

That the geographic area owned by the City of Bellingham and the Port of Bellingham identified in Exhibit A shall be designated as the Bellingham Waterfront Opportunity Zone and that it meets the following determinations as required by RCW 70.105D.150:

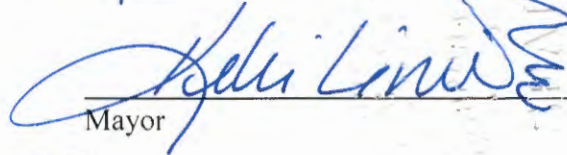
- (a) At least fifty percent of the upland properties in the Bellingham Waterfront Redevelopment Opportunity Zone (Bellingham Waterfront ROZ) are brownfield properties whether or not the properties are contiguous;
- (b) The upland portions of the Bellingham Waterfront ROZ are comprised entirely of parcels of property either owned by the city or county or whose owner has provided consent in writing to have their property included;
- (c) The cleanup of brownfield properties will be integrated with planning for the future uses of the properties and is consistent with the comprehensive land use plan for the Bellingham Waterfront ROZ; and
- (d) The proposed properties lie within the incorporated area of the City of Bellingham.

PASSED by the Council this 11th day of April, 2016.

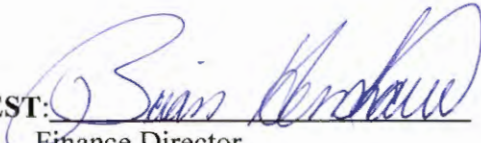


Council President

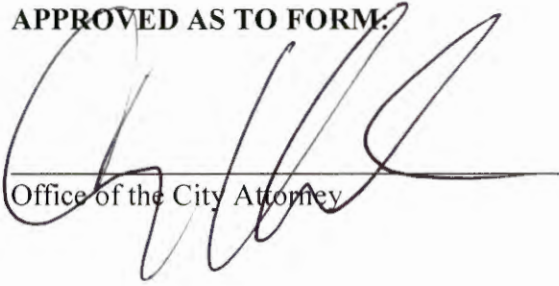
APPROVED by me this 15th day of April, 2016.



Mayor

ATTEST: 

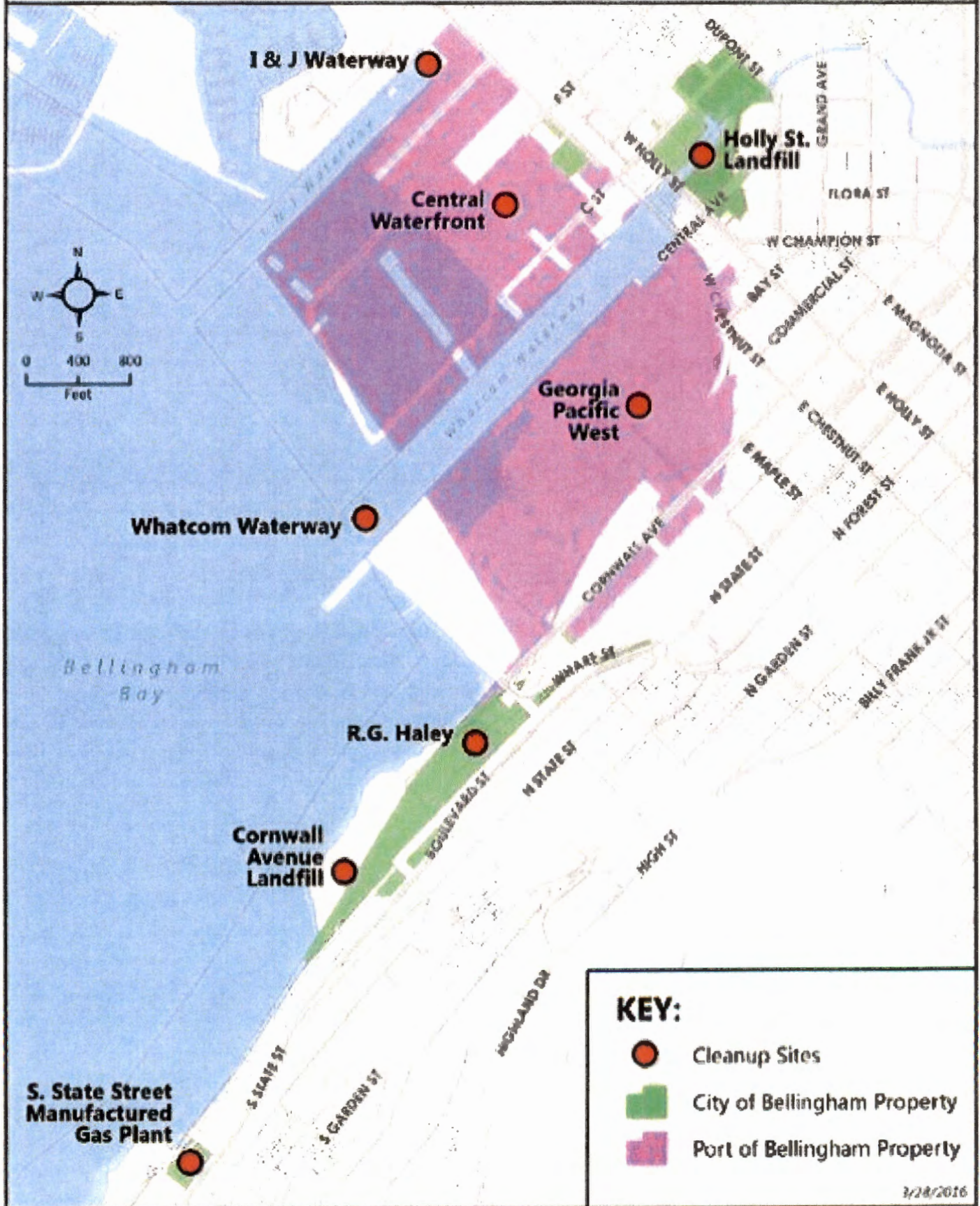
Finance Director

APPROVED AS TO FORM:


Office of the City Attorney

EXHIBIT A

Bellingham Waterfront Redevelopment Opportunity Zone



**Mount Baker McClellan Street
Redevelopment Opportunity Zone (Seattle 2017)**

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EXHIBIT 1
RESOLUTION 31731



SEATTLE CITY COUNCIL

Legislative Summary

Res 31731

Record No.: Res 31731

Type: Resolution (Res)

Status: Adopted

Version: 1

Ord. no:

In Control: City Clerk

File Created: 01/08/2017

Final Action: 02/10/2017

Title: A RESOLUTION designating the Mount Baker McClellan Street Redevelopment Opportunity Zone pursuant to RCW 70.105D.150(1) and making findings in support of such designation.

Notes:	Filed with City Clerk:	<u>Date</u> 2/10/2017
	Mayor's Signature:	2/10/2017
Sponsors: Burgess	Vetoed by Mayor:	
	Veto Overridden:	
	Veto Sustained:	

Attachments: Att A - Area Map of Mount Baker McClellan Street Redevelopment Opportunity Zone

Drafter: adam.schaefer@seattle.gov

Filing Requirements/Dept Action:

History of Legislative File

Legal Notice Published:

Yes

No

Version:	Acting Body:	Date:	Action:	Sent To:	Due Date:	Return Date:	Result:
1	Mayor	01/17/2017	Mayor's leg transmitted to Council	City Clerk			
1	City Clerk	01/17/2017	sent for review	Council President's Office			
	Action Text: The Resolution (Res) was sent for review, to the Council President's Office						
	Notes:						
1	Council President's Office	01/19/2017	sent for review	Affordable Housing, Neighborhoods, and Finance Committee			
	Action Text: The Resolution (Res) was sent for review, to the Affordable Housing, Neighborhoods, and Finance Committee						
	Notes:						

Legislative Summary Continued (Res 31731)

1	Full Council	01/30/2017	referred	Affordable Housing, Neighborhoods, and Finance Committee	
1	Affordable Housing, Neighborhoods, and Finance Committee	02/01/2017	adopt		Pass
	Action Text:	The Committee recommends that Full Council adopt the Resolution (Res).			
	Notes:	In Favor: 3 Chair Burgess, Vice Chair Herbold, Member Johnson			
		Opposed: 0			
1	Full Council	02/07/2017	adopted		Pass
	Action Text:	The Resolution was adopted by the following vote, and the President signed the Resolution:			
	Notes:	In Favor: 8 Councilmember Bagshaw, Councilmember Burgess, Councilmember González, Council President Harrell, Councilmember Johnson, Councilmember Juarez, Councilmember O'Brien, Councilmember Sawant			
		Opposed: 0			
		Absent(NV): 1 Councilmember Herbold			
1	City Clerk	02/08/2017	submitted for Mayor's signature	Mayor	
1	Mayor	02/10/2017	Signed		
1	Mayor	02/10/2017	returned	City Clerk	
1	City Clerk	02/10/2017	attested by City Clerk		
	Action Text:	The Resolution (Res) was attested by City Clerk.			
	Notes:				

CITY OF SEATTLE

RESOLUTION 31731

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2
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4 A RESOLUTION designating the Mount Baker McClellan Street Redevelopment Opportunity
5 Zone pursuant to RCW 70.105D.150(1) and making findings in support of such
6 designation.
7

8 WHEREAS, The City of Seattle's Housing Affordability and Livability Agenda report found
9 that Seattle is experiencing "a housing affordability crisis unlike any Seattle has
10 experienced since the Second World War" and affordable housing is one of the most
11 significant challenges facing Seattle; and

12 WHEREAS, the Mayor set out an ambitious goal to create 50,000 new units of housing over the
13 next 10 years, comprised of 30,000 market rate units and 20,000 affordable units; and

14 WHEREAS, Mount Baker Housing Association (MBHA) is a 501(c)(3) non-profit housing
15 provider and developer with plans to build affordable and market rate housing consistent
16 with the City's goals for more housing choices and transit-oriented development in the
17 Mount Baker urban village; and

18 WHEREAS, the Washington State Legislature has provided new tools to encourage and fund the
19 development of brownfield properties under the state's cleanup law, the Model Toxics
20 Control Act, chapter 70.105D RCW; and

21 WHEREAS, one of the new tools provided by the Legislature under RCW 70.105D.150(1)
22 authorizes local governments to designate geographic areas within their jurisdiction as
23 Redevelopment Opportunity Zones (ROZ) if the zone meets applicable criteria; and

24 WHEREAS, a designated ROZ authorizes property owners within the ROZ to apply for and
25 receive grant monies from the Washington State Department of Ecology's ("Ecology")

1 State Toxics Fund for investigation and cleanup of brownfield properties (contaminated,
2 underutilized properties); and

3 WHEREAS, Ecology has set aside and requested funding to provide to MBHA to implement
4 environmental cleanup and redevelopment of brownfield properties within the ROZ; and

5 WHEREAS, MBHA requests that The City of Seattle designate a Mount Baker McClellan Street
6 ROZ consisting of certain parcels (collectively "the Parcels"), located northeast and
7 southeast of the Martin Luther King Junior Way South and South McClellan Street
8 intersection in the Mount Baker neighborhood; such parcels are fully described in the
9 map of the area that is attached as Attachment A to this resolution; and

10 WHEREAS, more than 50 percent of the properties to be included in the ROZ are previously
11 developed and now vacant underutilized properties where reuse objectives are hindered
12 by the release or threatened release of hazardous substances apparently originating from
13 nearby dry cleaner operations and historic gasoline service stations that will require
14 remedial action under the Model Toxics Control Act, chapter 70.105D RCW; and

15 WHEREAS, the soil and groundwater contamination occurred on the Parcels many years ago,
16 and without MBHA stepping forward to cleanup and redevelop the Parcels, the
17 contamination will likely remain for years to come; and

18 WHEREAS, MBHA, the sole owner of the Parcels, has consented in writing to have the Parcels
19 included in the ROZ; and

20 WHEREAS, MBHA is proposing to build approximately 150 units of affordable housing once
21 the hazardous substances located within the proposed ROZ are remediated per the Model
22 Toxics Control Act, chapter 70.105D RCW; and

1 WHEREAS, the Parcels are designated for commercial/mixed use on the Future Land Use Map
2 and such use is supported by the City's planning documents, including but not limited to,
3 the North Rainier Neighborhood Plan, the Seattle 2035 Comprehensive Plan, the
4 McClellan Town Center Development Strategy, the Mount Baker Station Area Analysis,
5 Mount Baker Urban Design Framework, and the Accessible Mount Baker plan, all of
6 which contain numerous provisions supporting the type of redevelopment proposed by
7 MBHA; and

8 WHEREAS, the Mount Baker McClellan Street ROZ will be located within three blocks of the
9 Mount Baker light rail station and provide transit-oriented development; and

10 WHEREAS, establishment of the Mount Baker McClellan Street ROZ will encourage, foster,
11 and allow the cleanup and redevelopment of brownfield properties for affordable housing
12 in the heart of Mount Baker, one of Seattle's most racially and economically diverse
13 neighborhoods, furthering the City's goals for equitable development; and

14 WHEREAS, the proposed Mount Baker McClellan Street ROZ meets the criteria in RCW
15 70.105D.150(1); NOW, THEREFORE,

16 **BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SEATTLE, THE**
17 **MAYOR CONCURRING, THAT:**

18 Section 1. The Council finds that:

19 (a) At least 50 percent of the upland properties in the Redevelopment Opportunity
20 Zone designated in Section 2 of this resolution are brownfield properties;

21 (b) The upland portions of the Redevelopment Opportunity Zone designated in
22 Section 2 are comprised entirely of parcels of property whose owner has provided consent in
23 writing to have their property included within the zone;


1 (c) The cleanup of the brownfield properties in the Redevelopment Opportunity Zone
2 designated in Section 2 will be integrated with planning for future uses of the properties and is
3 consistent with the City's "Seattle 2035 Comprehensive Plan"; and

4 (d) The properties within the Redevelopment Opportunity Zone designated in Section
5 2 lie within the incorporated area of The City of Seattle,

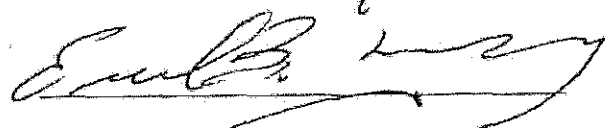
6 Section 2. The area depicted in Attachment A to this resolution is designated as the
7 Mount Baker McClellan Street Redevelopment Opportunity Zone pursuant to RCW
8 70.105D.150(1),

9 Section 3. The Office of Planning and Community Development is directed to consider
10 the cleanup of the brownfield properties in the Redevelopment Opportunity Zone designated in
11 Section 2 of this resolution in planning efforts for the area in which the properties are located.

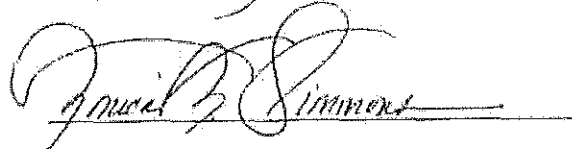
1 Adopted by the City Council the 7th day of February, 2017,
2 and signed by me in open session in authentication of its adoption this 7th day of
3 February, 2017.

4 
5 President _____ of the City Council

6 The Mayor concurred the 10th day of February, 2017.

7 
8 Edward B. Murray, Mayor

9 Filed by me this 10th day of February, 2017.

10 
11 Monica Martinez Simmons, City Clerk

12 (Seal)
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24 Attachments:
25 Attachment A: Area Map of Mount Baker McClellan Street Redevelopment Opportunity Zone

EXHIBIT 2
DIRECTOR'S FINDINGS

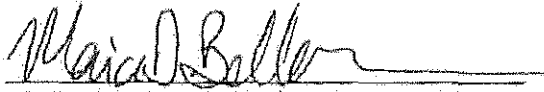
Under RCW 70.105D.070(3)(q), monies appropriated from the State Toxics Control Account may be provided as public funding to assist prospective purchasers with the costs of remedial action associated with brownfields properties if, among other criteria, the Director of the Department of Ecology finds that the funding: (1) meets any additional criteria established in rule by the department; (2) will achieve a substantially more expeditious or enhanced cleanup than would otherwise occur; and (3) will provide a public benefit in addition to cleanup commensurate with the scope of the public funding.

I hereby make the following findings with respect to providing \$400,000 in public funding to the Mount Baker Housing Association (MBHA) through an amendment to the Prospective Purchaser Consent Decree (PPCD) entered in *Department of Ecology v. Mount Baker Housing Association*, No. 16-2-29584-3 SEA (King Cty. Super. Ct. Dec. 8, 2016):

1. As of the date of these findings, Ecology has not established additional criteria in rule pertaining to the provision of public funding under RCW 70.105D.070(3)(q). There is thus no finding to be made in this regard.
2. I find that providing the funding will achieve a substantially more expeditious or enhanced cleanup than would otherwise occur. MBHA is a private, non-profit corporation that develops affordable housing in southeast Seattle. MBHA entered the PPCD with knowledge it would have to generate new, additional funding in order to complete the near-term remedial actions required by the PPCD and a final cleanup action that, under the terms of the PPCD, must be completed at the Mount Baker Properties Site (Site) before MBHA can redevelop properties within the Site. The terms of the PPCD provide that such additional remedial actions are contingent upon MBHA "obtaining or having sufficient Additional Funding" and require MBHA to "use all best efforts to seek and obtain Additional Funding." See PPCD at 11-12 (Sections VI.B, C). The currently identified potential sources of these additional funds include obtaining insurance policy coverage payments and settlement funds from other potentially liable persons. *Id.* at 8 (Section IV.G). Providing \$400,000 in public funding to MBHA will substantially advance MBHA's work in completing the remedial investigation/feasibility study currently required by the PPCD and allow it to leverage its existing and future resources toward obtaining additional funds and completing a final cleanup of the Site.
3. I find that providing the funding will provide a public benefit in addition to cleanup commensurate with the scope of the public funding. The Mount Baker neighborhood is one of Seattle's most economically and culturally diverse neighborhoods. The properties within the Site are currently underutilized, being occupied by, among other things, a vacant dry cleaning operation and a vacant gas/service station. MBHA's proposed redevelopment involves providing approximately 150 new affordable housing units on these properties. The

proposed new affordable housing units will address a well-documented critical need for such housing in Seattle. See, e.g., Seattle Housing Affordability and Livability Agenda Advisory Committee, *Final Advisory Committee Recommendations to Mayor Edward B. Murray and the Seattle City Council* (July 13, 2015). Further, the proposed redevelopment is expected to encourage additional sustainable, transit-oriented development near the Mount Baker Light Rail Station, which is located in the vicinity of the proposed redevelopment site.

DATED this 9th day of February, 2017.


MAIA D. BELLON, Director
Washington State Department of Ecology

**EXHIBIT 3
PUBLIC FUNDING SCOPE OF WORK AND SCHEDULE**

Phase 1. Remedial Investigation Planning			
Schedule	Activity	Deliverables	Estimated Expenditures by MBHA
June–December 2016	Data Review. MBHA will review previous environmental reports including results from fall 2016 McClellan Parcels site characterization funded by U.S. Environmental Protection Agency (EPA) Brownfields Program to design the proposed RI/FS.	Diagrams and maps for development of conceptual site model and RI work plan.	No Eligible Cost
January–March 2017	Draft RI Work Plan. MBHA will prepare a Draft RI/FS Work Plan that outlines the goals, scope, exploration locations, sampling, chemical testing rationale, analytical methods, field screening procedures, and quality assurance and quality control measures that will be utilized for completing the RI/FS. Provide to Ecology for review.	Draft RI work plan report	\$50,000 Costs Eligible as described in First Amendment to Prospective Purchaser Consent Decree, Section C.1.
April–May 2017	Respond to Ecology review of draft remedial investigation.	Correspondence, maps, diagrams, memos.	\$20,000
June 2017	Final Remedial Investigation Work Plan.	Final RI work plan report	\$5,000
Subtotal of Phase 1			\$75,000
Phase 2. Remedial Investigation Implementation and Reporting Phase			
July 2017	Obtain permits from City of Seattle for drilling and sampling in rights-of-way.	Permits obtained.	\$25,000

August 2017	Implement Remedial Investigation. Conduct explorations and sampling for soil, groundwater, and soil gas, and chemical analyses of samples.	On-site drilling and sampling.	\$225,000
September 2017	Additional Explorations. Ecology consultations and development of work plan for additional explorations, if needed.	Additional exploration work plan and on-site drilling and sampling.	\$200,000
October 2017	Vapor Intrusion. Assess risk of contaminant vapor intrusion into buildings. Prepare report.	Vapor intrusion sampling, and report of results.	\$50,000
Subtotal of Phase 2			\$500,000
Phase 3: Prepare draft Remedial Investigation Report			
November–December 2017	Draft Remedial Investigation Report. Results of all environmental investigations including VI assessment will be summarized in a Draft Remedial Investigation report, which will be completed in accordance with all substantive requirements of MTCA.	Draft RI report.	\$100,000
Subtotal of Phase 3			\$100,000
Total for three phases of RI/FS for MBHA project			\$675,000