



CITY OF PORTLAND ENVIRONMENTAL SERVICES



The Portland Building ■ 1120 SW Fifth Ave, Suite 613, Portland, Oregon 97204 ■ Dawn Uchiyama, Director

October 15, 2025

Sarah Miller
Heidi Nelson
Rebecca Digiustino
Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland, Oregon 97232

Re: Semi-annual Progress Report for Columbia Slough Consent Judgment

Dear Sarah, Heidi, and Rebecca:

In accordance with the Columbia Slough Consent Judgment between the City of Portland (City) and the Oregon Department of Environmental Quality (DEQ) entered into Multnomah County Circuit Court on May 8, 2024, the City submits this third semi-annual progress report to summarize progress and key action items the City has completed to fulfill obligations of the settlement agreement. Section 1.5 of Exhibit B, Scope of Work, of the Consent Judgment requires the City to submit semi-annual progress reports on April 15 and October 15 of each year to summarize the status of work required under each task. Accordingly, this third semi-annual progress report summarizes the work status and work completed since April 15, 2025.

Payment of Remedial Action Costs:

Pursuant to section 4.A of the Consent Judgment, the City wired \$5,000,000 to DEQ on June 10, 2024 within 45 days of entry of the Consent Judgment to fund performing or paying for investigation, removal, or remedial actions in the Columbia Slough. This was the first of three payments. A second payment of \$6,000,000 was wired to DEQ on July 28, 2025. DEQ confirmed receipt of this second payment on July 30, 2025 before the August 1, 2025 deadline. A third and final payment of \$5,000,000 will be wired to DEQ no later than August 1, 2026.

Payment of Natural Resources Damages:

Pursuant to section 5.A of the Consent Judgment, the City wired \$2,000,000 to DEQ on June 10, 2024 within 45 days of entry of the Consent Judgment for use by DEQ in consultation with Oregon Department of Fish and Wildlife to fund natural resource restoration projects, including remedial actions that provide natural resource benefits in

Ph: 503-823-7740 ■ Fax: 503-823-6995 ■ portland.gov/bes ■ An Equal Opportunity Employer

The City of Portland ensures meaningful access to City programs, services, and activities to comply with Civil Rights Title VI and ADA Title II laws and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and services. To request these services or file a complaint of discrimination, contact 503-823-7740 or 311 (503-823-4000), for Relay Service and TTY: 711.

the Columbia Slough. This payment completed the City's obligations to pay for Natural Resources Damages claims under the settlement agreement.

Payment of DEQ Source Control Personnel:

Pursuant to section 6.A of the Consent Judgment, the City wired \$500,000 to DEQ on June 10, 2024 within 45 days of entry of the Consent Judgment. In accordance with the Consent Judgment, DEQ is to hold funds from payment in an interest-bearing, site-specific account within the Hazardous Substances Remedial Action Fund. These funds are dedicated for DEQ staff or contract personnel to facilitate its source investigation and control work in the Columbia Slough. This was the first of three payments that shall total \$1,500,000 per Section 6 of the Consent Judgment. Funds provided with this payment are to be used only for work directly associated with the investigation and control of potential contamination to the Slough. DEQ shall provide an annual accounting of its charges made against these funds in a format similar to that used to document DEQ oversight expenditures. DEQ submitted the first of this annual accounting documentation on August 1, 2025. The remaining DEQ Source Control Personnel balance as of July 23, 2025 is \$451,279.16. The City will provide the next payment of \$500,000 to DEQ within 45 days of receiving accounting documenting that at least a total of \$300,000 has been expended pursuant to section 6.E of the Consent Judgment.

Basin Source Control Evaluation and Closure Documentation:

The City has been working with DEQ prior to and after entry of the Consent Judgment to identify potential ongoing significant sources of contaminants to the City stormwater conveyance system and implement upland source control measures where feasible. In compliance with Section 2.1 of Exhibit B, Scope of Work, of the Consent Judgment and the final *Columbia Slough Outfall Investigation and Basin Closure Work Plan* dated June 14, 2024, the City has begun source investigations within priority basins, evaluated previous stormwater and stormwater solids data to identify potential ongoing significant sources of contaminants of potential concern (COPCs) to the City's stormwater conveyance within these basins, and coordinated with DEQ to refer identified third-party ongoing significant upland sources to the City conveyance to appropriate regulatory enforcement programs. To effectively carry out this scope of work, multiple DEQ personnel along with members of the City's Industrial Stormwater Program, Columbia Slough Sediment Program, and Integrated Planning Groups have met on a regular basis (every other month) to discuss and review potential sources within priority basins. On months that DEQ and City staff do not meet to review basins, DEQ and City staff have completed basin inspections and reconnaissance walks in priority basins to verify or investigate points of interest discussed in prior meetings. The following work has been completed in support of this scope of work:

Priority Basin Inspections and Site Walks:

Tracking tables identifying potential sources of COPCs have been generated for priority basins 57, 58, 65, 73A, 59, 60, 61, 61A, 62, 62A, 63, 64, 65A, 56C, and CS-614 where Capital Improvement Program (CIP) stormwater treatment is in planning, design or

construction. Additionally, tracking tables were generated for basins 77A, 100, and 104B where stormwater treatment was constructed prior to the Consent Judgment. As it is a priority of the City to identify potential ongoing significant sources of contamination within basins where CIP stormwater treatment projects are planned, basin reconnaissance walks with DEQ have been conducted within most of these basins. As discussed in the previous semi-annual progress reports, basin walks were completed prior to October 15, 2024 in basins 65, 73A, 57, 58, 59, 60, 61, 61A, 62, 62A, 63, 64, and 65A.

In the spring and summer of 2025, the City and DEQ agreed to review existing basin tracking sheets and action items for the Kenton Priority Outfall Project (KPOP) basins (59, 60, 61, 61A) and the Piedmont Priority Outfall Project (PPOP) basins (62, 62A, 63, 64, 65A) where site walks have already been conducted. The objective of this review was to address remaining action items and determine what additional information is required to move basins towards closure in compliance with the final *Columbia Slough Outfall Investigation and Basin Closure Work Plan*. A final tracking table of post site walk follow-up actions in these basins was generated, that is being carried out in the fall, winter, and spring of 2025/2026.

Following completion of the KPOP/PPOP source investigation activities, the City and DEQ began planning basin source control sampling and site walks in the remaining basins where stormwater treatment has already been installed or where treatment is being planned and designed. These include outfall basins CS-614, 56C, 65, 73A, 77A, 100, and 104B. Efforts made in these basins are discussed in greater detail in the Sampling and Analysis for Upland Source Control Evaluations section on page 6.

In addition, tracking tables have been prepared for most of the basins that discharge to AOPCs. Tables have been drafted for the following basins: 56A, 93, 94, 104, 111B, AAL542, AAP235, and AAP570. A table for basin 53D was also prepared at DEQ's request. These basins are anticipated to be the focus of FY27 inspections and coordinated site walks.

Notable Action Items in Priority Basins:

Key information, decisions, and outstanding action items for priority basins are documented in the basin tracking tables referenced above. Tracking tables are updated iteratively as new information is gathered, basin site walks are conducted, and source tracing samples and data are collected within priority basins. As a result of basin inspections, reconnaissance walks, and source control enforcement, some example notable action items have been completed since April 15, 2025 in priority basins and are listed as follows:

- Basin 59 - Malarkey Roofing Co. ECSI #690, 3131 N. Columbia Blvd., submitted revised Source Control Evaluation (SCE) Report to DEQ for review. DEQ prepared draft Source Control Determination (SCD) DEQ staff memo. City verified that french drains shown in as-builts along N. Frontage Rd do not discharge stormwater during heavy rain events.
- Basin 60 - Tindall Family Properties, LLC near NW Cast ECSI #999, 9233 North Calvert Ave, has reentered VCP as discussed in previous semi-annual reports. DEQ received updated Technical Memorandum on May 28, 2025, and DEQ

- requested a Source Control Evaluation work plan in a letter dated August 13, 2025.
- Basin 60 - Young Ocean at former REM Steel facility, 9109 N. Wilbur Ave, received an NEC on July 17, 2025.
 - Basin 60 - Hoffar Woodworks at former Precision Sheet Metal facility, 9208 N Peninsular Ave, received an NEC on July 17, 2025.
 - Basin 61 - Pelett Property, 1812 N Columbia Blvd., same address as former Nicolai Co. ECSI #679, the City's Industrial Stormwater Program (ISW) inspected the building interior for inlets to unmapped laterals observed during Basin 61 video survey. No evidence of internal inputs to the City's stormwater system were observed, but two inlets in center of building were observed, which ISW has required the facility to cap. Facility sent ISW verification of inlet capping on May 23, 2025.
 - Basin 61 - Blasen Family LLC ECSI #3785 operating under the name United Shippers, 1601 N Columbia Blvd. DEQ has approved a remedial action plan for the property. A Contaminated Media Management Plan will be finalized after further characterization of the northern fill portion of the property. A secondary swale for stormwater management will be lined. A report summarizing the cap perimeter samples was received, and DEQ issued comments requesting additional characterization in uncapped areas with elevated concentrations. An action plan for the uncapped areas is being drafted for DEQ review. The facility received a 1200-Z industrial stormwater permit on April 7, 2025.
 - Basin 61 - Blue Ox Station LLC, 8440 N. Interstate Blvd, removed debris and materials that had been observed uncovered outdoors. The property appears to be in compliance as of July 30, 2025. PCB concentrations in adjacent stormwater samples were well below trigger level values.
 - Basin 61 - Hoffman Property ECSI #2846 was referred to DEQ's Materials Management Program.
 - Basin 61A - Glass to Glass, 866 N. Columbia Blvd, ISW required the facility to update its stormwater pollution control plan (SWPCP) and implement best management practices (BMPs) to control track out. Facility submitted updated SWPCP and installed new BMPs including glass storage under cover.
 - Basin 61A - ODOT Yard Columbia Slough ECSI #5023, 1100 N Columbia Blvd, DEQ working with ODOT to investigate stormwater pipes via video survey and redraw maps for better understanding of the conveyance system. Also working to finalize Source Control Report for facility. DEQ is working with ODOT to finalize a SC Report on the facility as the investigation of the I-5 swale functionality continues.
 - Basin 61A - ALSCO Linen ECSI #5009, 1441 N Columbia Blvd., ISW called facility on June 25, 2025 to ensure truck washing BMPs were being followed.
 - Basin 62 - Waste Management, Wastech ECSI #1271, 701 Hunt St, DEQ working with facility on source control measures as part of recent construction. An Environmental Management Plan was submitted to DEQ and a methane barrier was installed in late 2024. Methane monitoring has been ongoing since March 12, 2025, and DEQ is currently developing comments on a draft RI work plan, focused on sitewide methane monitoring. A 1200-Z was issued to the facility on December 12, 2024.

- Basin 62A – Star Oil Co., 8445 N. Kerby Ave, ISW required the property to install BMPs to prevent contaminated flow from leaving the site. A January 2025 site inspection confirmed that the site has been regraded and a berm has been raised to promote infiltration. ISW will visit the facility during rain event to ensure BMPs are effective.
- Basin 62A – M&M Construction ECSI #4157, 8501 N. Borthwick, Facility was issued a Notice of Violation (NOV) on May 9, 2025 for sediment in the right of way (ROW). Facility was issued a City SWPCP on July 7, 2025.
- Basin 63 – Fairmount Financial Property ECSI #3767, 570 N. Columbia Blvd., ISW visited the facility in July 2025 and confirmed removal of exposures.
- Basin 63 – MGA Auto, 8237 N Congress Ave., facility installed a stormwater diversion berm but has since left the facility.
- Basin 63 – Anchor Holdings LLC, formerly Rose Auto Wrecking ECSI #5706, 8140 N Commercial Ave. NW Metals is currently subleasing the property. ISW visited the property and attempted to work with tenant to install BMPs to remove exposure and prevent stormwater from entering onsite catch basins. Since April, the facility is in enforcement with DEQ’s Office of Compliance Enforcement for air, solid waste, and stormwater violations.
- Basin 63 – Ryder Truck Rental Facility ECSI #2241, 310 N Columbia Blvd., ISW reached out to facility in July 2025 to remind them of BMP requirements and elimination of Table 2 exposures as part of the facility’s NEC.
- Basin 64 – Ontime Truck Repair (formerly Pacific Coast Fruit Company, 8235 NE MLK Jr. Blvd. ISW requested the facility apply for a City SWPCP and remove exposure throughout the site. Facility submitted application and received City SWPCP on May 8, 2025.
- Basin 64 – American Barricade, 173 NE Columbia Blvd., ISW observed galvanized material storage in uncovered areas of the property, and informed owner that they must remove exposure or obtain a permit. Facility removed exposures as part of application for NEC but has since left the facility.
- Basin 65A – Total Mechanical, 2634 NE Columbia Blvd, ISW issued NEC in fall 2024, and has confirmed that uncovered and exposed equipment to stormwater has been removed. ISW inspected facility on October 10, 2025 and found facility to be in compliance.
- Basin 65A – ABC Supply, 1835 NE Columbia Blvd., obtained new City SWPCP on July 31, 2025.
- Basin 65A – Columbia Blvd Development/Portland Distributing, 2026 NE Columbia Blvd., ISW confirmed floor drains were decommissioned on September 30, 2025.

Sampling and Analysis Plan (SAP) for Upland Source Control Evaluations:

In September 2025, the City and DEQ collaborated on planning stormwater and stormwater solids sample locations in remaining priority basins where CIP stormwater treatment has been installed or is being planned and designed; specifically in basins CS-614, 56C, 65, 73A, 77A, 100, and 104B. A Sampling and Analysis plan (SAP) was finalized on October 8, 2025. Samples and sample locations were chosen to provide additional evidence where potential COPC sources may be entering the City’s conveyance system. In total, 86 stormwater samples with 6 additional opportunistic

samples, 36 stormwater solids samples, and 3 dry weather flow samples were proposed to answer additional source control questions in Basins CS-614, 56C, 65, 73A, 77A, 100, and 104B. Samples will be collected through the storm season, and data will be used to better assess potential ongoing sources within the basins.

Stormwater Treatment Capital Improvement Program Projects:

Stormwater treatment design and construction is underway in the 15 basins identified within Section 2.2 of Exhibit B, Scope of Work, of the Consent Judgment as well as the final *Columbia Slough Basin Stormwater Treatment Projects Work Plan* dated May 30, 2024. Project status is provided below for each of the projects in various stages of design or construction.

Completed Projects

Project No. E11279 in Outfall Basin 58 was completed in late 2024. The project entailed installation of a Contech Stormwater filter vault and sedimentation maintenance hole to manage and treat stormwater from City ROW in Basin 58. The filter vault was installed on a private property easement purchased by the City as no location within City ROW was suitable for installation of the vault. The current estimate of total cost at construction completion is \$1,558,545.

Project No. E11304 in Outfall Basin 65 was constructed in late 2024. The project entailed installation of a Contech Stormwater filter vault, sedimentation maintenance hole, and a diversion maintenance hole to manage and treat stormwater from City ROW in Basin 65. The current estimate of total cost at construction completion is \$1,962,717.82.

Final project reports are being generated for both Outfall Basins 58 and 65. In compliance with the final *Columbia Slough Basin Stormwater Treatment Projects Work Plan*, all final deliverables including the final project report and As-built drawings will be provided to DEQ.

Projects in Later Design or Construction:

Project No. E10918 in Outfall Basin 57 has moved through 90% design. The project entails installation of multiple filter vaults and UICs to manage and treat stormwater from City ROW in Basin 57 which includes all portions of Columbia Blvd within the basin, the Neighborhood Collector Streets, and large portions of the Local Service Traffic Streets. The current estimate at completion reflected in the current budget is \$6,772,167. Final design is anticipated at the end of 2025, and construction is expected to begin in June 2026.

Project No. E10626 in Outfall Basin 73A has moved through 90% design. The project entails installation of multiple filter vaults and sedimentation maintenance holes to manage and treat stormwater from City ROW in Basin 73A including Columbia Blvd and 42nd Avenue. The project is part of a local improvement district (LID) approved by City Council in September 2023, and the current cost estimate at 90% design is \$2,028,247.

Projects in Preliminary Design:

CIP projects planned for basins 59, 60, 61, and 61A within the Kenton Priority Outfall Project (KPOP) went through the City's integrated planning process where alternatives were developed, assessed, and recommended. Due to the basins contiguous layout along Columbia Blvd, project technologies in each basin were assessed together, and preliminary cost estimates were generated for multiple treatment alternatives considered (Project #E10690). After a thorough review through the planning process, it was determined that a pervious pavement grind and inlay (PPGI) currently utilized by local municipalities in Gresham and Milwaukie, OR would be particularly suitable and effective for this contiguous stretch of Columbia Blvd. On June 20, 2024, after a review of the proposal, DEQ wrote the City a letter of concurrence to move forward with the design of stormwater treatment within the four basins using PPGI.

Preliminary cost estimates for the KPOP basins total approximately \$18,900,000 for the PPGI and approximately \$5,500,000 for additional stormwater treatment components that include a filter vault on N. Frontage Rd in Basin 60, multiple UICs south of Columbia Blvd, and two green streets. Further detail is available in the City's Solution Adoption report.

Projects in Planning:

Projects that are currently in planning and alternative development phase include Project #E10700 in the Piedmont Priority Outfall Project (PPOP) Basins 62, 62A, 63, 64, and 65A, as well as Outfall Basins 56C and CS-614. In September, the PPOP Planning team presented a set of recommended stormwater treatment alternatives for the PPOP basins to the City's Future Production Committee. The recommended alternatives included PPGI along all stretches of Columbia Blvd through the five basins estimated at approximately \$22,580,000, additional conventional stormwater treatment solutions (i.e., UICs, green streets, and filter vaults) on select side streets estimated at approximately \$9,115,000, and an LID to implement conventional paving in unimproved roads in Basin 62/62A estimated at approximately \$8,260,000. The committee approved the recommended plan be moved forward into CIP for future delivery on October 14, 2025.

Stormwater treatment projects for Basins CS-614 and 56C have just entered the planning phase, and priority area summary reports have been developed for each Outfall Basin area. Planning will be continued for Basins CS-614 and 56C throughout FY 25/26.

As with the projects in later design, all stormwater CIP projects in planning or preliminary design are being generated to comply with provisions outlined in the City's Stormwater Management Manual (SWMM), the scope of work outlined in the May 2024 Consent Judgment, and *the Columbia Slough Basin Stormwater Treatment Projects Work Plan*.

Long-term Sediment and Fish Tissue Sampling and Analysis:

In compliance with Section 2.3 and 2.4 of Exhibit B, Scope of Work, of the Consent Judgment and the final *Columbia Slough 2025 Long-term Fish Tissue Sampling and Analysis Plan Amendment* and the final *Columbia Slough 2026 Long-term Sediment Sampling and Analysis Plan Amendment* (both dated May 30, 2024), the City has planned for upcoming in-water sediment and fish tissue sampling events. The City's Columbia Slough Sediment Program worked with the City's Water Pollution and Control Laboratory to

resolve remaining sampling and lab issues and obtain all necessary permits. A Federal Section 10 permit which allows for boat electrofishing in ESA listed waters, and a Scientific Taking permit to comply with state regulations were obtained in the fall 2024. Fish sampling began on April 14, 2025.

Fish collection began in the spring and will be completed in the fall 2025. To date, all fish have been collected from eight of ten Slough segments. The remaining two segments have been fished but only large-scale suckers have been observed. Should no carp be obtained from these segments, composites of large-scale sucker will be substituted from these Slough segments.

The City's Streamlining Committee is currently working with representatives of Oregon Department of State Lands (DSL), Army Corps, and DEQ to review the sediment sampling work and obtain all necessary permits. Sediment sampling is anticipated to begin in 2026.

In addition to fish tissue and sediment samples required as part of the Consent Judgment, the City has agreed to provide splits of fish tissue and sediment samples to Oregon State University, which is conducting research on PFAS concentrations and sources within the Columbia Slough in conjunction with DEQ. The City has provided tissue sample splits of the fish composites collected to date.

Alternative Remedial Measures (ARMs):

In compliance with Section 2.5 of Exhibit B, Scope of Work, of the Consent Judgment and the final *Columbia Slough Alternative Remedial Measures Work Plan* dated June 5, 2024, the City has begun reviewing potential opportunities along the entirety of the Columbia Slough to identify locations where watershed health improvement projects could be conducted in collaboration with DEQ and community members. Subject matter experts at the City of Portland focused on the Columbia Slough have been meeting every other week for the past year to identify properties and project ideas that could provide significant watershed health benefits/ecological uplift as well community benefits such as job training, increased access to nature and recreation, and community gathering spaces. To date, over 130 project ideas or opportunities have been identified and visited, and the group is working to focus the list to more feasible opportunities. Notes from these visits are being catalogued and incorporated into an ArcGIS Online database and virtual map. DEQ has permitted the City to revise two deliverable dates in the ARM Work Plan as follows:

- An initial list of ARMs to be submitted to DEQ for consideration in November 2025 will now be provided to DEQ in May 2026 along with the comprehensive ArcGIS Online (AGOL) database of potential watershed restoration ideas.
- A Final Alternative Remedial Measures Evaluation and Selection Report originally scheduled to be completed in May 2026, will now be provided to DEQ in May 2027.

Information on potential restoration opportunities within the Columbia Slough watershed, which is currently being integrated and documented in the database and AGOL map, will be shared with other potential partners who may be required and/or interested in completing restoration/mitigation work on the Columbia Slough.

Upcoming Work:

The City will continue making progress in all required tasks under the Consent Judgment in the next semi-annual period. The next semi-annual progress report will be submitted prior to April 15, 2026. Work over that period will include further construction and design of stormwater treatment projects, further sampling efforts and collaboration with DEQ on priority basin source control investigations, further planning and data sharing for current and upcoming sampling events, and further discussion of feasible Alternative Remedial Measures opportunities.

As always, please do not hesitate to reach out with any questions or concerns.

Andrew Davidson
Columbia Slough Sediment Program Manager

Cc:

Libby Smith, GSI Water Solutions, Inc.