

# Rehabilitation of Deteriorating Sewer Lines

October 28, 1986

MEMORANDUM FOR: Richard C. Brinck, Manager  
Portland Field Office, 10.3S

ATTN: John G. Bonham, Director  
Community Planning and Development Division

FROM: Nancy C. Silvers, Acting Deputy Assistant Secretary for Program Management /s/ signed

**SUBJECT: Clackamas County Sewer Line Project**

Last month, during Jim Broughman's visit to the Portland Field office, you discussed with him the eligibility of using CDBG funds to grout joints and install liners in the deteriorating sewer lines of Clackamas County.

According to two EPA officials here in Washington, Charles Mooar and Brian Maas, the proposed repairs would be considered a reconstruction cost under EPA guidelines and would therefore fall under the category of CDBG eligible activities contained in §570.201(c).

We understand that the area in which the work will occur meets the definition of blight in Oregon law and therefore fulfills that portion of the national objective requirements contained in §570.208(b)(1). However, you will need to make a determination that "there is a substantial number of deteriorating or dilapidated buildings or improvements throughout the area" (§570.208(b)(1)(ii)) in order for this project to meet the national objective of aiding in the prevention or elimination of slums or blight. The deterioration of a single improvement such as the sewer system would not be sufficient to meet the standard in §570.208(b)(1)(ii).

Your letter to Doug Youngsman in the Clackamas County Office of Community Development should reflect your determination on this national objective issue.