State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary

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December 8, 2006

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

Subject: EPA Brownfields Assessment Grant Application for Petroleum Products: Wisconsin's Brownfields Urban Reinvestment Initiative

Dear Mr. West:

The Wisconsin Department of Natural Resources (WDNR) is applying for $200,000 in petroleum assessment grant funds to conduct environmental assessments and clean-up planning. The WDNR is continuing its multi-partner initiative to raise the reinvestment profile, and thus quality of life, in some of Wisconsin's most-needy neighborhoods. The Governor has designated the 30th Street Industrial Corridor area in the City of Milwaukee as the first Urban Reinvestment Initiative (URI) project. The WDNR is seeking EPA's assistance to continue our efforts with federal funds, as the state is facing a $1.6 billion budget deficit that will leave little or no funds to continue this initiative with state dollars.

1. Applicant Identification: Wisconsin Department of Natural Resources, 101 S. Webster Street, P.O. Box 7921 RR/3, Madison WI 53707-7921.

2. Funding Requested: Assessment and Cleanup Planning, $200,000 Community-wide Petroleum Products.

3. Location: The five-mile area known as the 30th Street Industrial Corridor (pop: 31,918), City of Milwaukee, Wisconsin. City of Milwaukee Contact: Mayor Tom Barrett, 200 East Wells Street, City Hall Rm. 21, Milwaukee, Wisconsin, 53202. Phone 414-286-2200. Fax 414-286-3191.

4. Contacts: Project Director: Darsi Foss, Chief, Brownfields and Outreach Section, 101 South Webster Street (RR/3), Madison, Wisconsin, 53707. Darsi.Foss@Wisconsin.gov. Phone: (608)267-6713. Fax: (608)267-7646. Chief Executive: Scott E. Hassett, Secretary, Wisconsin Department of Natural Resources. 101 S. Webster Street, PO Box 7921, Madison, Wisconsin, 53707-7921. Scott.Hassett@Wisconsin.gov. Phone: 608-266-2621; 608-261-4380 (Fax).

5. **Date Submitted:** December 8, 2006.

6. Project Period: From October 2007 to September 2009.

7. Population: The five-mile area known as the 30th Street Industrial Corridor, population 31,918; City of Milwaukee, Wisconsin population is 596,974.

8. Other: The 30th Street Industrial Corridor area of Milwaukee includes these areas of special consideration: designated as a Renewal Community by the U.S. Department of Housing and Urban Development; state-designated Community Development Zone; environmental justice area, due to economic and cultural challenges; areas designated for Milwaukee Community Development Block Grant funds; and Milwaukee Brownfields Showcase Community.

8. Cooperative Partners: Margaret Brunette (414) 263-8557 and Jim Schmidt (414) 263-8561, WDNR Southeast Region, Milwaukee; Brenna Holly, (414) 444-4706, 30* Street Industrial Corridor Corporation (ICC); Dave Misky, (414) 286-8682 and Benjamin Timm (414) 286-5756, Milwaukee Dept. of Community Development (DCD); Henry Nehls-Lowe (608) 266-3479 and Elizabeth Evans (608) 266-3393, Department of Health and Family Services (DHFS); Terri Linder (414)286-5789, Milwaukee Health Department; and Laurel Berman, Ph.D., (312) 886-7476, Agency for Toxic Substances and Disease Registry (ATSDR).

Project Summary:

Milwaukee is Wisconsin's largest city (pop. 596, 974) and presently one in four people are living at poverty levels; a figure that has worsened since 2000, when it was one in five. In north-central Milwaukee, a rail corridor runs north-south along 30th Street for five miles through what was once the manufacturing and economic backbone of the city. This area is called the 30th Street Industrial Corridor (the "Corridor"). A great percentage of the manufacturing jobs are now gone, and many industrial properties are vacant and under-utilized. Certain areas within the Corridor are being redeveloped through public-private partnerships, but a formidable task remains in many areas of the Corridor. The assessment grant will be used to look for the presence of environmental contamination at targeted brownfields properties.

The census tracts that include portions of the Corridor are substantially more economically challenged than the rest of the City of Milwaukee or the state; a city whose poverty rate is now the 9th worst in the nation (Milwaukee's *Business Journal,* Sept. 29, 2006, Vol. 23 No. 54, p. A11). A comparison of US census tract data from the last 6 years reveals the following:

- 95% of the residents are considered "minority," compared to 55% in the entire city and 20% statewide;
- 37% of adults lack a high school diploma, compared to 25% in the city and 15% statewide;
- more than 39% of the area residents live below the poverty level, compared to 21% in the city and 9% statewide;

- 45% of the area's residents 16 years and older report not being in the labor force;
- unemployment is over 9%, compared to 4.6% in the state;
- the area within a one half-mile radius of the approximately five-mile long 30th Street Industrial Corridor includes a large and dense population of 31,918; and
- the area's median household income is $19,467, compared to $46,538 statewide.

The 30th Street Corridor's 200 known brownfield properties threaten public health (e.g., exposure to contaminated soil and airborne contaminants, presence of illegal drug markets, unsafe buildings, and rodent infestations), the environment (i.e. contaminated groundwater discharging to surface water), and impose a blighting effect (i.e. graffiti, weeds, trash dumping) on this economically disadvantaged neighborhood. Across the entire neighborhood, 15% of housing units are vacant, in some blocks more than 25%. Residents of the Corridor's neighborhoods also have more safety concerns compared to others within the city. In 2005, there were 141 serious crimes per 1,000 residents in the Corridor, compared to 91 per 1,000 residents for the entire city (Milwaukee IT Management Division/COMPASS project).

Given the economic, social and environmental challenges facing this neighborhood, the WDNR joined with the City of Milwaukee and the 30th Street Industrial Corridor Corporation (ICC) to submit a grant application for federal brownfields assessment funding. The partnership received two site assessment grants in 2005 totaling $400,000, which are currently being used in the Corridor to conduct assessment efforts. In the first year alone, 15 Phase 1 environmental assessments were completed, with 3 investigations started, and an area wide assessment of historic soil and groundwater data being conducted. The Partners believe that the 2005 grant funds will be fully expended by fall of 2007. Thus, the Partners are seeking further assistance to address the remaining brownfields in this area. Assistance from the federal government is even more critical as the state faces a $1.6 billion budget deficit that must be balanced by July 2007.

The WDNR believes that continuing the Partners' efforts in this neighborhood are vital to reaching our goal of improving the neighborhood's quality of life. To that end, we have expanded our partnership in 2006 to include the Wisconsin Department of Health and Family Services (WDHFS), the city health department, and the Agency for Toxic Substances and Disease Registry (ATSDR). The expanded partnership reflects the growing interest in the impact of brownfields redevelopment on the public health of urban neighborhoods. The Partners believe that, with your assistance, we can make a difference in these urban neighborhoods. Thank you in advance for your consideration of this project. We hope you agree that it is meritorious of your continued support.

Sincerely,

Scott Tassett

ScottTTassett, Secretary

Attachment

Cc: US EPA Region V Brownfields

Wisconsin's Urban Reinvestment initiative:
Targeting Milwaukee's 30th Street Industrial Corridor Area
Brownfields Petroleum Assessment Grant

THRESHOLD CRITERIA

A. Applicant Eligibility

The Wisconsin Department of Natural Resources (WDNR) is leading a multi-partner Urban Reinvestment Initiative to improve the quality of life in one of Wisconsin's most needy neighborhoods. The WDNR is seeking additional U.S. Environmental Protection Agency (US EPA) hazardous substance assessment funds to continue the brownfields activities in the City of Milwaukee's 30th Street Industrial Corridor (the "Corridor) area. The WDNR is a government entity created by the Wisconsin legislature in 1967, and thus an eligible applicant for assessment grants. The 30th Street Industrial Corridor (IC) was identified as the first reinvestment target neighborhood by WDNR, on the basis of 39% of the residents living below the federal poverty level and a minority population of 95%, according to the 2000 US Census.

B. Letter from State or Tribal Environmental Agency: Not applicable. The applicant is the state environmental agency.

C. Site Eligibility and Property Ownership Eligibility: Not applicable. This is a community-wide assessment application.

RANKING CRITERIA

A. Petroleum Assessment Grant Proposal Budget

The WDNR proposes to conduct $200,000 of site assessment activities on properties with known or suspected discharges of petroleum products. These funds will be targeted at a subset of the more than 200 Corridor properties where there is known environmental contamination. There are many more properties where environmental contamination is suspected due to past commercial or industrial uses. The largest parcel in the northern area is the 150-acre former Tower Automotive, which once made vehicle body frames and provided more than 8,000 living wage jobs. The facility is now closed and the company is in bankruptcy.

Petroleum Assessment Budget

Budget Categories	Phase I	Community Outreach	Financial & Reporting	Assessments & Investigations	Remedial Action Plan Development	Total
Personnel	$5,000	$2,400	$2,000	$5,400	$4,000	$18,800
Travel	$0	$800	$0	$0	$0	$800
Supplies	$50	$300	$0	$25	$25	$400
Contractual	$30,000	$0	$0	$100,000	$50,000	$180,000
Total	$35,050	$3,500	$2,000	$105,425	$54,025	$200,000

The Urban Reinvestment Initiative partnership includes the City of Milwaukee (referred to as the "City") - including the Redevelopment Authority for the City of Milwaukee (RACM) and the Milwaukee Economic Development Corporation (MEDC) - and the 30th Street Industrial Corridor Coalition (ICC) (supporting letters attached). The Partners plan to use the federal funds to continue conducting assessments of and clean-up planning for the estimated 200 brownfields properties in the Corridor. Contractual funds will be used to conduct approximately 15 Phase I Assessments at an estimated price of $2,000 each, for a total cost of about $30,000 in contractual dollars. In addition, the Partners plan to use over $150,000 in contractual funds to perform up to five site investigations, including the preparation of clean-up plans. The WDNR will use its personnel to provide technical and financial project management and outreach, for a total expenditure of $18,800. In addition, the WDNR estimates additional expenses for travel and supplies for the effort. Additional work on the project will be provided as an in-kind service. For example, WDNR will use its s. 128(a) funds to assist with web page development and other outreach efforts. The ICC and the City, who have staff located within the Corridor, will assist with community outreach activities using their funds as an in-kind service.

The distribution of the responsibilities among the Partners has worked successfully in utilizing two, US EPA brownfields site assessment grants awarded in 2005. In the first year of this existing grant, the Partners were responsible for: (1) producing 15 Phase I environmental assessment reports; (2) commencing three Phase II assessments; and (3) funding a multi-property groundwater and soil data compilation effort. Partnership efforts galvanized by the Urban Reinvestment Initiative have resulted in the following in-kind services: (1) a WDNR-created web site and GIS display for the Corridor; (2) an evaluation of the neighborhood plans in the Corridor by University of Wisconsin-Milwaukee's urban and regional planning graduate students; (3) the appointment of a city staff person as the 30th Street project manager; and (4) the advent of a public health initiative by the Milwaukee Health Department, the Wisconsin Department of Health and Family Services and the Agency For Toxic Substances and Disease Registry (ATSDR).

B. Community Need

B1. Description of the Target Community. The area targeted for these assessment funds is the 30th Street Industrial Corridor (the "Corridor"), located in north-central Milwaukee. This economically distressed area falls within the Enterprise Community - census tracts designated as the inner city by the City of Milwaukee for purposes of receiving federal aid - and the U.S. Department of Housing and Urban Development (HUD) designated Renewal Community boundaries. The Renewal Community designation provides federal tax incentives for businesses located within some of the nation's most economically distressed census tracts in order to spur economic development and job growth. The seven census tracts that include the Corridor provide a stark picture of a disadvantaged population: a 95% minority population; and living in a city that has the ninth worst poverty rate in the nation (September 29, 2006, Milwaukee's *Business Journal).* Some additional factors include: (1) only half of the residential properties are owner-occupied, compared to 67% for the city average; (2) the average assessed value of Corridor residential properties are half that of the

average residential properties in the entire city; and (3) in 2000, 14% of the residential properties in the Corridor were tax delinquent compared to 6% for the entire city.

The Corridor was once a major manufacturing center employing a high percentage of area residents. Unfortunately, over the last 30 years the percentage of neighborhood residents employed in manufacturing has declined from nearly 40% to less than 15%. In the last 20 years, the aggregate purchasing power of the neighborhood dropped by more than one-third, due to a severe drop in median household income and a decrease in population. Across the entire neighborhood, 15% of housing units are vacant, with more than 25% in some blocks. Of the housing units that are not vacant, most are rentals, with many of these owned by absentee landlords who invest little in maintenance and are at risk of abandonment.

Overall, the area within a one-half mile radius of the approximately five-mile long the Corridor includes a large and dense population of 31,918 residents and a high number of environmentally sensitive individuals. Approximately 11,838 children under the age of 18 (or 37% of residents) live within this area. The nearby community is also economically challenged and residents are in need of economic opportunities. For example, 45% of area residents that are 16 years and older report they are not in the labor force. Residents are also in need of skill development opportunities. Skill levels and occupations are reflected in the area's median household income, $19,467, less than half of the state's median income. At the same time, 39% of the residents lived below the poverty level, well above the city's rate of 21% and the state's 9%. Area residents would benefit from more jobs inside the area. Fully 33% of the area's households did not have a vehicle available for their use. This means many residents have severe challenges in reaching better-paying jobs located outside the Corridor area, where many entry-level jobs are available (2000 US Census Data).

Summary of Census tracks data within a 14 mile of the 30th St Industrial Corridor

Community Background	**30th St. Area**	**City**	**Wisconsin**
Population	31,918	596,974	5,363,675
% Minority	95%	55%	20%
% High School Graduates	63%	75%	85%
% College Graduates	6%	18%	22%
% Unemployed	19%	9%	5%
% Below Poverty	39%	21%	9%
% Without Vehicles	33%	21%	8%
Median Household Income	$19,467	$32,216	$43,791

(Source of all data in Section B1: 2000 and 2004 US Census - File SF1 and SF3)

B2. Benefits to the Target Community: Today, many small and medium businesses are struggling to survive in the Corridor; however, a number of other enterprises are flourishing. From an engineering firm to a fine art foundry, new start-up businesses have recently made their home in the Corridor and plan to stay. A number of these small and medium businesses are looking for space to expand, but the fear of possible contamination from neighboring sites is often a severe limitation. Likewise, staff from

the ICC frequently field requests from real estate developers, brokers and business owners looking to relocate to the area. The most frequently asked question from potential investors is "What is the environmental situation of the property?" Potential investors are often unwilling to take on the liability risk until the extent of any possible contamination is known. Without funding to do such assessments, and with potentially less-riskier opportunities available in other areas of Milwaukee, the redevelopment and restoration of the Corridor's economic health has been put on hold.

However, with assessment funding, redevelopment of brownfields in the Corridor will follow, creating employment opportunities in a neighborhood plagued by high unemployment and poverty rates. Businesses locating in the Corridor would generate more benefits, including minimal commute cost to the employee, increased city tax revenue, increased state income tax revenue from the resulting wages and the removal of neighborhood blight and its dampening impacts on surrounding properties. Increasing the tax valuation of properties will also result in more money for public schools. Redevelopment of these sites would remove asbestos and lead paint in abandoned buildings and reduce exposure to air emissions for residents who walk to work or who commute within the Corridor. Such reinvestment have paid off for other Milwaukee neighborhoods, resulting in a decline in crime rates, illegal drug labs and trespassing in unsecured buildings.

As mentioned, the Partners received two 2005 assessment grants from US EPA totaling $400,000. The Partners worked with the impacted community to identify targeted properties for assessment and possible clean up. In the first year, the Partners and other volunteers have: (1) generated 15 Phase I assessment reports; (2) started three Phase 2 assessments; (3) commenced a multi-property compilation of environmental data; (4) conducted a study of neighborhood development plans; (5) established a GIS web page and a project web page; and (6) placed a city employee in the Corridor as the 30th Street project manager. Further, the Partners plan on conducting additional assessments to utilize these 2005 grant funds. The Partners estimate that it will have spent or committed to spend 75% or more of the $400,000 in the 2005 grant funds by October 1,2007.

While this effort is a start, the WDNR's contaminated sites data base, BRRTS (Bureau for Remediation and Redevelopment Tracking System) lists approximately 200 known contaminated properties in the Corridor. Also, given the heavy industrial and commercial businesses that were concentrated in this blue-collar neighborhood, there are many brownfields properties that are yet to be discovered or confirmed as contaminated, including the 150-acre Tower Automotive site. The Partnership needs additional funds to keep this momentum going, given that the private sector has not yet collectively embraced the opportunities that are available in this area of Milwaukee. This challenge is further compounded by a state budget deficit estimated at $1.6 billion - which must be balanced by July 1, 2007 - that leaves little hope of new state funding for this needy area.

B3. Impact of Brownfields on the 30th Street Industrial Corridor: Since the majority of land in the Corridor has historically been occupied by multiple manufacturing operations, almost the entire non-residential portion of the Corridor is suspected of having environmental contamination issues. With nearly 50 known tax delinquent brownfields, the Corridor has the highest concentration of tax delinquent brownfields sites in the City. In addition, many older manufacturing companies such as tanneries, foundries, breweries, and motor manufacturers have closed their doors, leaving behind mothballed brownfields that provide no economic benefit for the community. The WDNR estimates there are about 200 *known* contamination sites within the Corridor target area. Given the industrial and commercial history of the neighborhood, there are many brownfields properties that are yet to be confirmed as contaminated.

The Corridor's brownfields properties threaten public health (e.g., exposure to contaminated soil and airborne contaminants, presence of illegal drug markets, dangerous buildings, and rodent infestations), the environment (e.g. contaminated groundwater discharging to surface water), and impose a blighting effect (i.e. graffiti, weeds, trash dumping) on this economically disadvantaged neighborhood. Lead poisoning is another public health issue threatening the area. Statistics show that in 1998, 19.5% of the children tested in Milwaukee had blood lead levels equal to or above 10 ug/dL. This is about five times the national average of 4%. Areas in economically challenged Milwaukee neighborhoods like the 30th Street Corridor often have even higher rates of lead poisoning. In 1997, clinics serving inner city minority populations reported 38-56% of the children tested at their clinics had lead levels equal to or greater than 10ug/dL (Milwaukee Health Department). These unacceptable exposures are present in a neighborhood that has few resources available - i.e. access to health care and insurance, as well as living-wage jobs for residents to afford adequate health care - to deal with such known and unknown health concerns.

C. Site Selection Process

C1. Site Selection Process and Criteria: The WDNR is applying for a community-wide assessment grant to conduct additional site assessments and cleanup planning, targeted at parcels in the 30th Street Industrial Corridor. The Partners' experiences suggest that access to properties is the key to starting the assessment and, ultimately, the redevelopment process. Therefore, as with the previous grants, the first properties that will be assessed are those to which the City can readily gain access. These properties are either owned by the City, tax delinquent and unlikely to be reclaimed by the owner, or owned by a cooperative private party. The City and the 30th Street ICC will develop and circulate a preliminary list of properties to neighborhood and community organizations. The Partners will ask members of these organizations for comments on the draft list and recommendations for any additional sites. This draft list will have been evaluated for eligibility and access by the City and WDNR (both entities have experience with EPA's site eligibility criteria from administering both assessment and RLF grants).

A neighborhood open house will be offered to discuss the site selection process, criteria and potential brownfields sites. The possible criteria for site selection include interest from developers; potential for site redevelopment as a business, residence or green

space; estimated contaminant exposure of the local population; status as a tax delinquent property; history of hazardous substance use or storage; current condition and use of surrounding properties; and property size and cost to complete Phase I or II environmental assessments. Once sites are determined to be eligible by EPA, the City will gain legal access, as needed, to those properties on the list. The WDNR also has the authority to secure an inspection warrant at known or suspected contamination properties, if the responsible party does not agree to do so or cannot be located.

C2. Inventories of Brownfields in the 30th Street Industrial Corridor. The City has maintained a database of tax delinquent, a brownfields property, which is estimated at approximately 170 properties. About 50 of those tax delinquent brownfields are located in the 30th Street Industrial Corridor. The WDNR's contaminated sites database, BRRTS, identifies at least 200 known contamination sites within the Corridor. These sites have been geo-located and appear on WDNR's web page. In addition, a separate City GIS system will be accessible to the public in 2007. Properties with undiscovered environmental contamination, or those not reported to WDNR, are not included in the database. However, once a Phase 2 environmental assessment documents the presence of contamination, that information must be reported to the WDNR. In addition, the ICC maintains an Industrial Property Inventory for the area, which contains 345 industrial parcels in the database. The Industrial Property Inventory is a comprehensive database of industrial sites in the corridor, including those in full operation, underutilized, vacant, for sale or lease. The Partners are also exploring a partnership with the one of the local universities to conduct an inventory of properties, as an in-kind service.

C3. Access Issues. Once sites are determined to be eligible by EPA, the City will gain legal access, as needed, to those properties on the list. The City will use its authority under state tax law to gain access to priority tax delinquent properties. The City can obtain a special inspection warrant that provides access for environmental testing for any tax delinquent property. The WDNR and the City have experience securing cooperative access agreements, and WDNR and the City also have extensive knowledge of dealing with orphaned properties and tracking down absentee owners. The WDNR also has the authority to secure an inspection warrant at known or suspected contamination properties, if the responsible party does not agree to do so or cannot be located. To date, the Partners have been very successful in securing access to the targeted properties.

D. Sustainable Reuse of Brownfields

D1. Support for Resource Conservation. For all brownfields redevelopment projects in the Corridor, the WDNR and its partners will promote environmental best management practices and pollution prevention in conducting environmental cleanups, as well as in construction and operation of future businesses, homes and parks. When needed, a team of local experts will meet with the community leaders and potential developers, if available, to discuss financial incentives and programs that could assist with development of sustainable and healthful projects. Best practices will be explored, including sustainable development practices, such as green building and unique storm

water runoff practices. In 2006, the City created a public-private "green team initiative" to develop a green vision for Milwaukee, focusing its efforts on innovative approaches to manage storm water, develop smart energy policies, and create jobs. The Partners will use this City-adopted plan to help guide its efforts.

There are a number of resources available to promote pollution prevention: (1) the Wisconsin "Focus on Energy" program, promoting combined heat and power and on-site energy production on brownfields redevelopment sites; (2) WDNR's Bureau of Cooperative Environmental Assistance, providing pollution prevention assistance and promoting innovate environmental regulatory methods; (3) WDNR's Waste Reduction & Recycling grants; (4) Waste Cap Wisconsin, Inc., information and grants; Waste Cap is a statewide, industry-supported non-profit providing information and funding to minimize waste generation and maximize recycling of materials at brownfields projects; (5) state and federal cooperation to conduct emergency removals if leaking storage drums or dilapidated buildings are identified; and (6) the City has developed a set of sustainable development design guidelines, based on the Leadership in Energy and Environmental Design (LEED) rating system. The City encourages prospective buyers of city or tax delinquent property to consider these guidelines.

D2. Promotion of Economic Benefits. The grant would provide tangible economic benefits by helping raise the investment profile of this disadvantaged neighborhood. Assessment activities will clear up environmental uncertainty on at least five to seven sites through Phase II findings, in addition to at least 15 Phase I findings. This uncertainty is one of the major factors stymieing development in this area. Despite these challenges, the City has a proven track record of leveraging investment in individual properties or neighborhoods. For example, Milwaukee has taken on more than 70 brownfields projects, which have generated more than 2,000 jobs and nearly $400 million in construction or renovation investment. For every dollar Milwaukee invested in environmental activities, the tax base increased by nearly $60. In addition, a great deal of the brownfields redevelopment has enhanced the public's access to both the Milwaukee and Menomonee rivers, by building bicycle and walking paths. In the Menomonee Valley, the removal of human made structures in or near the river has created a renaissance in the health of the river for both habit and recreational use.

D3. Promoting a Vibrant Community. Milwaukee has taken a proactive approach to promoting its City as a vibrant, healthy community, ranking 16th out of the 50 largest communities for "sustainability" (Source: 2006 Sustainlane Government Rankings). They have also applied for and received state funds for a comprehensive land use plan under the state's smart growth law. The following projects are a reflection of that vision:

(1) **City development** - An unprecedented amount of urban development is happening throughout Milwaukee in the form of new construction, historic renovation and neighborhood revitalization. Historic renovations can be seen in the Third Ward, Walkers Point, Brewers Hill and many other urban neighborhoods boom as increasing numbers of people desire to live, work and play amongst the unlimited opportunities of downtown Milwaukee; (2) **Milwaukee Green Team** - the Mayor recently launched the

Milwaukee Green Team - a group of eleven business, community and environmental leaders who have provided recommendations on innovative, cost-efficient ways the City and private sector can preserve Lake Michigan, reduce energy costs and create jobs in the growing environmental technology and green building industries; (3) **Vacant Lots & Abandoned Buildings** - The City of Milwaukee sold over 200 lots in 2004. The sale of these lots will result in over $30 million in neighborhood redevelopment. In addition, a new City ordinance forces owners of boarded-up buildings to repair or sell their properties instead of leaving them empty. These efforts have greatly improved the appearance of city neighborhoods; (4) **Chimney Park in the Menomonee Valley** - creating a lawn theater, pedestrian and bike bridge, and connection to the river. Trails to the waters edge allow for canoe and kayak set-ins, giving boaters access to the park and the Menomonee River. Athletic fields will also be part of the park; (5) **River Lawn Park in the Menomonee Valley** - allows physical access to the river for trail and park users. A large portion of the River Lawn is dedicated to storm water management, so this area takes on more passive uses such as informal lawn and naturalized areas along with a network of walking trails; and (6) **'World Leadership' Award for Milwaukee's public housing projects** - as a model of affordable housing that transforms neighborhoods. The World Leadership Forum issued the award to the City of Milwaukee Housing Authority in a December 2005 ceremony in London (UK). Projects from around the world were submitted on the environment, urban renewal, housing, health, city planning, architecture, civil engineering, education, the economy and employment. The City of Milwaukee already has many green projects, including Highland Gardens, a public housing facility that features the largest residential modular green roof in the country.

E. Creation / Preservation of Greenspace/ Open Space or Non-profit Purpose

Long-standing, open space inequity - in both quantity and quality - appears to be an environmental equity issue in inner-city Milwaukee. Although 10% of Milwaukee County is dedicated as open space, only 1.5% is open space in the northern half of the Corridor. In addition to the quality of life issues associated with the lack of green space, another challenge is proper design of open space, such as adequate lighting, to prevent parks from becoming unsafe areas at night. Johnson Park, located just east of the Corridor, is underutilized by residents because the topography shields the interior of the park from the street, making it attractive for drug use. Clearly, the vision for "reinvesting" in this area of Milwaukee is to enhance the residents' quality of life, and that includes creating new green space and enhancing existing spaces.

The Fond du Lac and North Avenue Comprehensive Neighborhood Plan, adopted by the City of Milwaukee, clearly and consistently states the community's desire to increase the amount of open space and enhance the beauty and safety of parks and streetscapes. Not-for-profit land trusts, such as the Wisconsin's Urban Open Space Foundation, are actively pursuing acquisition of properties with potential recreational uses. Also, Urban Open Space is already using creative partnership agreements between the City and local organizations to create parks and greenspace. Similar arrangements could be utilized in the Corridor. Also, University of Wisconsin landscape architecture students have developed plans for streetscaping and improvements to

pedestrian walkways through a cooperative project with the 30th Street ICC. The Partners will expand its efforts to engage WDNR's Urban Forestry program to reforest blighted areas of the Corridor for aesthetic and health-related benefits.

In addition, where there are environmental clean up issues, the WDNR will work with the Partners to secure necessary funds, such as from WDNR's green space grant program or through WDNR's brownfields revolving loan program. With respect to maintaining the long-term stewardship and preservation of any green space projects, the WDNR uses deed restrictions and conservation easements to ensure that land remains in the public domain. If land use controls are needed, including maintenance, Wisconsin has specific state law, s. 292.12, Wis. Stats., which requires such long-term stewardship of the property. The WDNR has experience in marketing and administering public funds for these green space projects.

F. Pre-Award Community Notification

F1. Notification to the targeted communities. WDNR and its Partners share a strong commitment to public involvement. Community notification has included *both* local and statewide outreach, including the following steps (please see chart below):

Local Notification	Statewide Notification
Draft application and invitation to comment on ICC web site; 11-14-06	Discussion with Brownfields Study Group; 11-2-06 (meeting), 11-20-06 (electronic);
Public access to grant materials at ICC and other community organization offices; 11-14-06	Invitation to comment on both assessment applications, on WDNR web page; 11/13-06
Public comment announcement distributed at Business Improvement District #37 in 30th St. Corridor; 11-14-06	News release & invitation to comment to 500 media outlets; 11-14-06
Email draft summary to community groups requesting comments; 11-15-06	Electronic notice & invitation to comment to 700 subscribers; 11-15-06
Regular telephone contacts and meetings on grant application with local ICC staff and community organizations/residents	Legal notice & invitation to comment in 22 state newspapers; 11-22-06

F2. Selection of the Notification Methods. The localized nature of the target community helped to focus WDNR's choice of notification methods. Neighborhood residents look to trusted local organizations for news of future activities. The Partners targeted seven organizations, listed in Section G4, to help deliver project plans to residents of the ICC neighborhoods through meetings. In addition, the Partners ensured that the draft application was available for public review and comment in the neighborhood ICC office, and on the internet. The Partners were able to build on the City's and ICC's existing partnerships with these neighborhood associations, which had been built on previous issues surrounding municipal services, as well as business development and expansion. City and ICC staffs know the neighborhood activists, provided information about the grant application and solicited comments on the proposal. Statewide efforts were targeted to Wisconsin's active brownfields community, composed of public, private, and non-profit organizations, through the methods listed in part F1 above.

F3. Length of Comment Period. The public comment period for the draft grant application was three weeks, from November 13 to December 1. Notifications of the intent to submit a grant application began immediately after the proposed guidelines were published by US EPA, on October 12. On November 13, we posted our draft application on WDNR's Internet site, with an invitation to the public to submit comments. We used electronic newsletters, postings to two Internet sites belonging to WDNR and 30th Street ICC, discussions among different brownfield target audiences (e.g. Brownfields Study Group), announcements at neighborhood meetings, posting of materials at neighborhood organization offices, discussion among partnership organization members, and legal notices in the state's two largest newspapers.

F4. Response to Comments. Public comments were due on or before December 1, 2006. After careful review and consideration by management, WNDR modified the grant proposal where appropriate to incorporate these public comments. A response to the public comments will be prepared and posted on the Partners' web sites, as well as sent to those providing comments. In addition, all those who provided comments will be placed on our distribution list and will receive periodic updates and progress reports on our grant activities.

G. Ongoing Community Involvement

G1. Plans for Community Involvement: The WDNR has well-developed community involvement activities in the Corridor that began in October, 2004, and which will continue under this grant. Working with our Partners, WDNR will continue to engage the residents and businesses in the Corridor area through presentations at neighborhood and business association meetings, and making material available at neighborhood organization offices and on the web. The Partners will solicit community input on our new effort to document the health-related impacts of brownfields in this area and the benefits to local children and adults of cleaning up these brownfields. The WDNR will also maintain and update the WDNR Urban Reinvestment Initiative web site, which describes our efforts, our progress and provides information about the individual brownfield properties that are the subject of this initiative. The WDNR and its Partners have developed a 30th Street Web site, located on the 30th Street ICC's web page, http://www.30thstreeticc.org/realestate/flashmaps/Open.html, along with the WDNR's Urban Initiative web site, at http://www.dnr.state.wi.us/org/aw/rr/rbrownfields/uri-30th-street.htm. In addition, the City is making the environmental data available to any member of the public that reguests it.

G2. Efforts to Develop Partnerships. The Partners includes the WDNR, the City of Milwaukee and the 30th Street ICC. Under this grant, this partnership is being expanded to include the federal Agency for Toxic Substances and Disease Registry (ATSDR), the Wisconsin Department of Health and Family Services and the City Public Health Department. These public health organizations are well-known and respected among neighborhood residents, and other community organizations are eager to work with these Partners to address the health concerns of Corridor residents. The Partners hope to emulate the success of the Menomonee Valley Partners, by creating a non profit to

assist in administering and coordinating the social, public health, economic and environmental activities planned for the area. Further, the Partners hope to develop a model to establish a public health baseline, and track health impacts as brownfield cleanup and redevelopment takes place. ATSDR is overseeing a pilot project using data collected in Milwaukee. The end product of this effort is to develop a health-screening tool to aid environmental and health professionals in assessing the threats to public health presented by specific brownfields. Milwaukee presents a unique opportunity to quantify public health impacts in this manner and continued assessment funding is crucial to maintaining this momentum.

G3. Means for Communicating Progress. Our Urban Reinvestment Initiative already has a network of allied community development corporations and neighborhood associations, which are listed in Section G4. Most importantly, the City has designated a staff person as the 30th Street Coordinator, and this person resides in a neighborhood business 2 to 3 days a week. The Partners will continue to disseminate much of our information to area residents through these trusted local organizations. This network includes the 30th Street ICC newsletter and the ICC executive director's history of providing information and updates to area residents. Our Partnership will continue to utilize local newsletters, community meetings, web sites, news releases, mailing lists and aldermanic newsletters to communicate the Partnership's progress and to seek input. Since the most credible communication often takes place face-to-face, the ICC partners will also be present at local meetings. In addition, the WDNR will continue to maintain the Urban Reinvestment Initiative web site.

G4. Community Participation. The following community organizations are committed to improving the quality of life in inner-city Milwaukee: (1) **Northwest Side Community Development Corporation's** mission is to improve the business environment for low-income communities through community economic development, and to make the northwest side a destination for businesses and residents. Contact: Howard Snyder, 414-447-8230; (2) **Sherman Park Community Association** is a non-profit organization that promotes advocacy/civic engagement, business stimulation and other cooperative ventures to benefit people within its boundaries. Contact: Steve O'Connell, 414-444-9803. (3) **Groundwork Milwaukee's** mission is to bring about the sustained regeneration, improvement and management of the physical environment by developing community-based partnerships which empower people, businesses and organizations to promote environmental, economic and social well-being. Contact: Mary Beth Driscoll, 414-405-3272; (4) **Local Initiatives Support Corporation (LISC)** is a national non-profit organization with offices in 35 cities. LICS organizes capital, expertise and other resources to support non-profit community development corporations transform distressed neighborhoods into healthy ones and foster their connection to the socioeconomic mainstream of the metropolitan region. Contact: Leo J. Ries, 414-273-1815; (5) **Milwaukee Community Service Corps (MCSC)** is a job training program that has been preparing young adults for careers since 1991. Since 1998, it has provided training for youth in the field of environmental remediation. Contact: Chris Litzau, 262-880-4811; (6) **1000 Friends of Wisconsin** is a non-profit environmental group that works to protect and enhance Wisconsin's urban and rural landscapes. Contact: Steve

Hiniker, 608-259-1000; and (7) **Urban Open Space Foundation** is a not-for-profit organization dedicated to enhancing the environmental, social, and economic quality of Wisconsin's urban neighborhoods. It does this by helping to transform unused, underused and blighted spaces into vibrant public places. Since the organization's founding in 1996, it has helped protect and restore more than 300 downtown acres in the greater Milwaukee and Madison regions. Contact: Marcia Caton-Campbell, 414-289-7799.

H. Reduction of Threats to Human Health and the Environment

H1. Reduction of Threats. This area's brownfields threaten public health (e.g., exposure to contaminated soil and airborne contaminants, presence of illegal drug markets, dangerous buildings, and rat infestations), the environment (i.e. contaminated groundwater discharging to surface water), and impose a blighting effect (i.e. graffiti, weeds, trash dumping) on this economically disadvantaged neighborhood. Lead poisoning is another public health issue threatening the area. Statistics show that in 1998, 19.5% of the children tested in Milwaukee had blood lead levels equal to or above 10 ug/dL. This is about 5 times the national average of 4%. Areas in economically challenged Milwaukee neighborhoods like the 30th Street Corridor often have even higher rates of lead poisoning. In 1997, clinics serving inner city minority populations reported 38-56% of the children tested at their clinics had lead levels equal to or greater than 10ug/dl_ (Source: Milwaukee Health Department).

Further, there are secondary health implications for neighborhoods whose quality of life factors (e.g., income level, access to health care, recreational areas, grocery stores) are below average. In 2005, there were 141 serious crimes per 1,000 residents in the Corridor, compared to 91 per 1,000 residents for the entire city (Milwaukee IT Management Division/COMPASS project). Obesity, diabetes, and asthma are also major problems in the target area. Lack of access to recreational areas, such as safe parks and health care facilities, contribute to this situation. These health conditions are aggravated by poor air quality and a lack of access to exercise opportunities. In a random telephone survey of City of Milwaukee adults conducted in 2000, only 56% of whites, 50% of blacks and 49% of Latinos described their health as excellent or very good. Between 15% and 20% of respondents reported suffering from asthma. (City of Milwaukee Health Department, Milwaukee's Healthiest 2000)

The WDNR and its Partners will use the data collected through this effort - both environmental and public health data - to prioritize the sites for cleanup. The WDNR will work with its Partners to access state and federal funds (e.g. EPA's Superfund removals program, WDNR's RLF funds) for assistance to address these uncontrolled exposure situations. This effort also will assist in identifying sites for the state's brownfields clean up grants and loans. The Partners will also coordinate efforts to focus resources on the non-brownfields health issues which challenge our efforts to improve the quality of life in the neighborhood. In particular, the Partners will be working city, county, state and federal health officials on the many concerns in this neighborhood.

H2. Partnerships for Protection of Human Health and the Environment: As previously mentioned, WDNR will work with its Partners, including the Wisconsin Department of Health and Family Services (WDHFS), City health, and the Agency for Toxic Substances and Disease Registry (ATSDR) to identify and prioritize properties for removal actions, assessment, and other needed health-driven actions. The health partners offer the following services:

- WDHFS staff provide environmental health services, including: (1) on-site and written, site-specific health "consultations" on exposure conditions at contaminated sites and those undergoing remediation; (2) consultation with state agencies and local officials on risks for chemical-specific or exposure pathways, and how those risks impact cleanup and redevelopment options; and (3) education and outreach, including presence at public meetings to answer questions on health impacts.
- City health staffs are committed to include consideration of public health issues in brownfields redevelopment activities by asking for input from state and local health professionals. In addition, the City is committed to working on all health-related issues in the 30th street area, not just on those that may be related to brownfields.
- ATSDR staff is working with the Milwaukee staff and WDNR on a pilot project to measure the possible impact to public health the clean up and reuse of brownfields has on urban residents. ATSDR is using these initial finding to see if national, health-based performance measures can be developed, measured and replicated on a national basis.

The Partners are committed to identifying and addressing the multitude of health issues in the neighborhood. The WDNR will provide the technical environmental expertise on ensuring that the investigation, clean-up and redevelopment meet all applicable public health and environmental laws, through oversight provided by the Remediation and Redevelopment program. All sites receiving funds will be required to seek WDNR review and approval at specific milestones in the process, such as at the site investigation stage, remedial action plan stage and at completion of the remedial action. WDNR's public involvement requirements, in addition to the federal requirements, will ensure that the public is adequately informed about and able to engage in the project.

I. Leveraging of Additional Resources

II. Funds for Additional Assessment Needs: The City has taken a leadership role in applying for and receiving brownfields funds for the City. In the 30th Street area, Milwaukee is applying for state assessment grants for specific properties, to assist in "jump s" targeted properties. The state funds will be used for initial activities that may not be eligible for federal funds, such as demolition. The Partners in this grant application are also committed to provide staff for adequate oversight of the project. The designation of Benjamin Timm as the City's project manager for the 30th Street Corridor is a significant commitment. Mr. Timm is the City's liaison to the neighborhood's stakeholders. Each of the Partners has devoted staff time to the coordination and integration of public health concerns into brownfields redevelopment. These in-kind staff hours pertaining to the grant alone account for more than $150,000 annually. Other funds leveraged include: (1) Milwaukee's Department of Neighborhood Services has funds committed to demolition of structures where there is a threat to

health or safety, and will dedicate resources to the area; (2) The City of Milwaukee is also willing to forgive up to $100,000 of back taxes if results from assessment funds discover manageable cleanup costs; and (3) Staff with EPA's Superfund removal program will be contacted if a property is discovered where an immediate removal action is necessary to protect human health or the environment. The WDNR, US EPA and the City are involved at the former Esser Paint facility, located in the southern portion of the Corridor, where negotiations with the current owner continues on a federal, Superfund removal action.

12. Demonstrated Ability to Leverage Funds: The Partners will aggressively seek additional public, federal, state, private and non-profit investment. The following funds will be pursued for projects in the 30th Street area: $3.4M for Assessment Grants (20% match required); $1M for Green Space Grants (20-50% match required); and $14M Commerce Brownfields Grants (20-50% match required). In addition, the state has the following tools to leverage additional investment: state tax credits; two kinds of TIF districts; $750,000 in Coastal Management Grants; property tax cancellation tools; dry cleaner reimbursement funds; federal tax deduction approvals; and approximately $5M in state block grant funds for brownfields. In addition, communities have been successful using federal block grant funds, economic development administration grants, and transportation grants to leverage additional investment. As an example of the amount of funds that could be leveraged, the Commerce Brownfields Grants have leveraged $14.50 for *every* state dollar awarded. The WBC estimates that it would be able to leverage $7 for every RLF dollar, for a total estimate of $21M. Locally, Milwaukee has taken on more than 70 brownfield projects, and for every dollar Milwaukee invested in environmental activities, it leveraged $60 in tax base increase.

J- Programmatic Capability/Management Structure.

J1. Management Plan. The cooperative agreement will be managed by the Remediation and Redevelopment program within WDNR. Funds will be reimbursed and tracked by staff that has 15 years of experience. Since 1996, WDNR has received and managed brownfields funds in the form of cooperative agreements, including two assessment grants awarded in 2005. The WDNR has entered into an intergovernmental agreement with the City of Milwaukee to clarify the use of the City's environmental consultants and funding mechanisms, which is allowed under state law. WDNR has a sound track record of effectively managing and spending its federal cooperative agreement funds. EPA funds have assisted the WDNR to leverage a significant amount of investment in brownfields. For example, EPA provides funds for brownfields staff, which in turn have assisted 150 brownfields projects since 1988, creating an estimated 5,800 new, full-time jobs, increasing the taxable property value by $210 million and reclaiming 1,350 acres of brownfields properties. In addition, WDNR has awarded $9.9 million state grant dollars to 259 brownfields site assessment projects, totaling more than 900 acres.

Since 1996, WDNR has been the recipient of brownfields funds through EPA cooperative agreements., and funds the following activities: (1) web pages development and maintenance for a site providing general information on remediation and redevelopment, with 30,000+ users in the last year; (2) a web-based public record of

18,000 contaminated sites where hazardous substances and petroleum have been reported to the WDNR; (3) inventory and survey of over 400 historic disposal sites; (4) a proactive contaminated site discovery of almost 500 sites; (5) geo-location of 5,600 contaminated properties and historic disposal sites; (6) annual cleanup of 400 sites; (7) annual audit of institutional controls at 40 sites; (8) a One Cleanup Program MOA between WDNR and EPA to clarify agency roles and responsibilities under three major federal cleanup laws, and (9) conduct over 70 meetings and/or presentations to brownfields audiences. WDNR's s. 128(a) cooperative agreement accomplishments reports can be found at http://www.WDNR.state.wi.us/orq/aw/rr/cleanup/rr_success.htm.

2. History of Managing Federal Grants. The WDNR has extensive experience in the management of federal funds. OMB Circular A-133 Audit findings have been very positive. In particular, WDNR manages dozens of federal grants totaling tens of millions of dollars annually, and has managed this level of grants for over 30 years. The Remediation and Redevelopment (RR) program manages 15 federal grants, with an annual budget of over $4 million for more than 15 years. One of the program's 15 EPA grants is the $400,000 brownfields assessment cooperative agreement, for the 30th Street Industrial Corridor initiative. The Wisconsin Legislative Audit Bureau (LAB) conducts the OMB Circular A-133 single audit of WDNR at the end of each state fiscal year. LAB's most recent completed audit of WDNR for state fiscal years 2004 and 2005 did not contain any adverse findings. The WDNR has never been required to comply with any special "high risk" terms and conditions under agency regulations implementing OMB Circular A-102.

3. Brownfields Cooperative Agreement Recipient. WDNR, specifically the RR program, has received Superfund Core Brownfields grants from October 1994 through June 2005. WDNR has also received Superfund Site Assessment Brownfields grants from October 1998 through the present. WDNR received its first annual Section 128(a) State Response Program grant for September 2003 through August 2004. Recently that grant was amended to include funding through August 31, 2007. WDNR has consistently completed the following activities for each of these grants: (1) quarterly progress reports required per grant conditions; (2) semiannual progress reports required by WDNR's Environmental Performance Partnership Agreement (EnPPA) with EPA Region 5; (3) brownfields reporting measures required through grant conditions or the EnPPA; and (4) annual Financial Status Reports (FSRs) required per grant conditions, often submitting these on a more frequent quarterly basis.

4. Tracking and Measuring. The WBC will continue to follow the minimum requirements for reporting and tracking in the grant terms and conditions. In addition, the WDNR is updating it electronic, web-based BRRTs data base to track the RLF funds awarded to specific projects. In addition, the WDNR's RLF web page will have site specific information posted about each individual project. The WDNR has been a leader in documenting its programmatic and site-specific accomplishments, and will continue to do so with this effort.