

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary

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OCT 15 2009

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

Subject: EPA Brownfields Assessment Coalition Grant Application

Dear Mr. West:

The Wisconsin Brownfields Coalition (WBC) is applying for \$1 million in assessment funds - \$800,000 in hazardous substance and \$200,000 in petroleum funds. The WBC members include the Wisconsin Department of Natural Resources, and the following 3 Wisconsin Regional Planning Commissions (RPCs): Northwest Wisconsin RPC, West Central Wisconsin RPC, and Southeastern Wisconsin RPC.

These governmental entities successfully applied for and received EPA brownfields revolving loan clean-up and assessment funds since 2004. The partnership has helped Wisconsin by providing direct assistance to Wisconsin communities, and leveraging millions in dollars. Given this success, the WBC is seeking to expand its partnership by applying for assessment dollars to assess the known or perceived environmental and public health impacts of closed, closing and bankrupt manufacturing plants in the state.

Mandatory Contents of Cover Letter

a. Applicant Identification:

Wisconsin Department of Natural Resources, 101 S. Webster Street, P.O. Box 7921 RR/5, Madison WI 53707-7921.

b. Funding Requested:

- i) Assessment
- ii) \$1,000,000
- iii) Contamination: \$800,000 in Hazardous Substances and \$200,000 in Petroleum Funds.
- iv) Coalition

c. Location: State of Wisconsin

d. N/A (site-specific property information)

e. Contacts:

- i) Project Director: Darsi Foss, Chief, Brownfields and Outreach Section, 101 South Webster Street (RR/5), Madison, Wisconsin, 53707. Darsi.Foss@Wisconsin.gov. Phone: 608-267-6713. Fax: 608-267-7646.
- ii) Chief Executive: Matthew J. Frank, Secretary, Wisconsin Department of Natural Resources. 101 S. Webster Street, PO Box 7921, Madison, Wisconsin, 53707-7921. Matthew.Frank@Wisconsin.gov. Phone: 608-266-2621. Fax: 608-261-4380.

f. Date Submitted:

Submitted no later than October 16, 2009, through bfcompetition@epa.gov.

g. Project Period: From October 2010 through September 2013.

h. Population:

- i) 5,363,675 in the State of Wisconsin.
- ii) 5,363,675 in the State of Wisconsin.

The WBC hopes that EPA agrees that Wisconsin's brownfields initiative is a project well worth EPA's commitment to continue investing resources in. Thank you in advance for your consideration.

Sincerely,



Matthew J. Frank,
Secretary

cc: Deborah Orr - US EPA Region V Brownfields
Wisconsin Brownfields Coalition Members
WBC Partner Communities
Wisconsin Brownfields Study Group

THRESHOLD CRITERIA

1. Applicant Eligibility

The Wisconsin Brownfields Coalition (WBC) is the applicant for this \$1 million coalition assessment grant: \$800,000 in hazardous substance and \$200,000 in petroleum funds. The WBC consists of the Wisconsin Department of Natural Resources, as the cooperative agreement administrator, and three Wisconsin Regional Planning Commissions (RPCs): Northwest Wisconsin, West Central Wisconsin, and Southeastern Wisconsin. The state legislature created the WDNR in 1967. The WBC members' application eligibility documentation for the RPCs are in Attachment A. Letters documenting membership in the WBC are in Attachment B.

2. Letter from State or Tribal Environmental Authority

Not applicable to this application, as the WDNR is the applicant.

3. Site Eligibility and Property Ownership Eligibility

Not applicable as this coalition application does not identify specific brownfields sites.

RANKING CRITERIA

1. Community Need

a. Health, Welfare and Environment

(i) Effects of Brownfields: Wisconsin communities have a demonstrated need for funds to assess and investigate approximately 4,350 properties (i.e., "open sites") with known contamination, and an estimated 2,500 yet-to-be-discovered brownfields. The state is notified of 500 new sites needing cleanup annually. Well over 50% of all open sites are predominately contaminated with non-petroleum substances. In essence, some of the most challenging sites remain in Wisconsin's inventory: foundries, dry cleaners, manufactured gas plants, electroplaters, and wood treating sites. In addition, there are 4,000 known waste disposal sites in Wisconsin where little is known about their environmental or public health impact. These properties pose a potential threat to the public, as well as the air, land and waters of the state and its economy.

As of September 2009, Wisconsin became the nation's leading state for manufacturing employment; over 15% of its job base is employed in manufacturing (US Bureau of Labor Statistics). While often seen as the "dairy state," Wisconsin has a strong history of heavy and light manufacturing as a major part of its economy. Like other states, however, Wisconsin has lost a significant number of manufacturing jobs. Since 2000, Wisconsin has lost 25 % of its manufacturing base; since 2007, the state has lost 137,100 jobs, which 45% were manufacturing (Center on Wisconsin Strategy – "COWS"). With this historic job loss, a record number of plant closings in urban and rural parts of the state have occurred. As a result of this national economic crisis, an entirely new generation of brownfields sites has been created in Wisconsin.

Over the last 5 years, almost 600 businesses have notified the state that they planned to close or have closed (Wisconsin Department of Workforce Development). This year alone, there have been 200 notifications to the state. This data reflects only a portion of the closed plants, as businesses with less than 50 employees are not required by state law to provide advance notice of a plant closing. These closed and bankrupt plants have occurred so rapidly that they have overwhelmed the federal, state, and local government programs that have traditionally responded to these closings. In Wisconsin, small and large communities that are struggling with dwindling revenues are now faced with a new, unexpected challenge: how to deal with abandoned, bankrupt and mothballed properties that may or may not pose public health and environmental challenges. These challenges face local

fire departments, the assessor's office, public health staff, state work force development, hazardous waste and cleanup staff and federal EPA staff.

Wisconsin faces a unique challenge because many of these manufacturing plants are located in "rural" areas of the state. Wisconsin only has 13 cities with a population greater than 50,000 residents; Milwaukee is the largest city has a population of 596,974 (2000 US Census). A great many of the closed manufacturing plants are located in smaller, rural communities, where the private sector will have little or no interest in revitalizing the property without significant public assistance. Rural communities have the challenge of finding public resources for environmental costs that far outweigh the assessed value of these properties.

Urban communities in Wisconsin face the weighty prospect of a large percentage of inner-city properties being designated as closed, bankrupt or mothballed brownfields. These properties are disproportionately located in low-income neighborhoods, which have the highest minority populations, on average. As an example, Milwaukee is the 11th poorest city in the nation (US Census Bureau September 2009). Rural communities and inner-city neighbors share a commonality; the federal, state and local governments will have to be the catalyst for assessing, cleaning up and redeveloping these properties. Without significant, coordinated public investment, this "generation" of brownfield sites will take decades to revitalize.

Brownfields contribute to the following environmental and public health concerns:

- In Wisconsin, 75% of residents rely on groundwater as their primary source of drinking water. This is reflected in the fact that there are still 750,000 private wells in this state, as well as hundreds of municipal wells, which are vulnerable to contamination migrating from uncontrolled brownfield properties. WDNR's database indicates that there are 250 sites that have impacted private water supply wells, and that still require cleanup.
- Wisconsin is home to one of the largest PCB cleanups in the nation - the Fox River proposed NPL site. An estimated 70% of PCBs entering Lake Michigan are from this source of contamination (an estimated 700,000 pounds of PCBs).
- In Wisconsin, 49 waters carry polychlorinated biphenyls (PCB) advisories for fish.
- There is a state-wide mercury advisory, because that contaminant is found in almost all waters throughout the state. Assessing the land-based sources of this contamination will hopefully result in these sources being cleaned up, thus reducing the exposures to public health and reduce the migration of those chemicals into Wisconsin waters, air and soil.
- Wisconsin ranks third in the nation for total water surface per square mile of land. The use of these assessment funds along waterways, including the Great Lakes, will assess sites that if cleaned up, would reduce or halt contaminant loading, which impacts Wisconsin's native fish population.
- Five of the 42 EPA-designated Areas of Contamination on the Great Lakes are located in Wisconsin, including Green Bay, Sheboygan, and Milwaukee.
- Many indigenous (Wisconsin tribes) and immigrant peoples (e.g., Hmong community), as well as recreational anglers, consume fish from these impacted or threatened waterways. Some of the greatest Hmong population areas (Milwaukee, Green Bay and Sheboygan) are home to a high percentage of brownfields, Superfund sites, and EPA AOC Great Lakes contamination areas.

Health and Welfare of Sensitive Populations: Of Wisconsin's 5.4 million residents, 5.6% are African American or Black, 1.3% American Indian and Alaska Native, 2% Asian, and 2% other race (U.S. Census Bureau 2000). Wisconsin has the third largest population of Hmong in the U.S. Further, Wisconsin is home to 11 federally recognized Indian tribes. According to the 2006 Center on Wisconsin Strategy (COWS) economic report, one out of every 10 Wisconsinites, and more than one out of every 6 children in Wisconsin live in poverty. According to year 2000 data from the US Census Bureau, approximately 42.5% of the families headed by females-only are below the poverty level. Wisconsin also has 22 designated Community Development Zones, one Rural Enterprise Community and one Renewal Community designation.

According to the Wisconsin Minority Health Program's Report 2001-2005, the following information on sensitive populations is available:

- African Americans are the largest racial/ethnic minority population in the state. In 2000, 300,245 people in Wisconsin identified their race as African American or black, representing 5.6% of the state's population.
- More than three-fourths of all African Americans in Wisconsin live in Milwaukee County - 73% live in the City of Milwaukee.
- According to the 2000 Census, the poverty rate in Wisconsin was highest among African Americans; 32% of African Americans reported living in households where income was below the poverty level, nearly four times greater than the state's poverty rate (8.7%).
- The poverty rate was 42% among African American children in Wisconsin under age 18.
- In 2000, 87,995 people in Wisconsin identified their race as Asian, a 68% increase from the 1990 Census. The Hmong comprised 38% of Wisconsin's Asian population, making it the largest Asian population in the state. 27% of Wisconsin's Asian population lives in Milwaukee County.
- In 2000, the proportion of Asians in Wisconsin who lived in poverty (20%) was double the state poverty rate. Twenty-three percent of Asian children lived in poverty.

Scientific data that conclusively links the environmental problems associated with brownfields to the health and welfare of sensitive populations, such as the elderly, minorities, children, and women of child-bearing age, is somewhat limited in Wisconsin, as well as on the national level. Brownfields practitioners assume that when brownfields are cleaned up and returned to productive use, the "quality of life" indicators of a neighborhood population improve – reduction in crime, exposure to contaminants, exposure to dangerous structures, general health (both physical and mental) and economic improvements.

Some of the data that supports this conclusion include:

a. "Public Health Implications of Hazardous Substances in the Twenty-Six U.S. Great Lakes Areas of Concern," a 400-plus-page study was produced by a division of the Centers for Disease Control (CDC) and Prevention at the request of the International Joint Commission. The study was originally scheduled for release in July, 2007, by the CDC's Agency for Toxic Substances and Disease Registry (ATSDR). While the CDC has only released this study in draft, it does tentatively conclude "that more than nine million people who live in the more than two dozen 'areas of concern'- including such major metropolitan areas as Chicago, Cleveland, Detroit, and Milwaukee - may face elevated health risks from being exposed to dioxin, PCBs, pesticides, lead, mercury, or six other hazardous pollutants." (As previously noted, 73% of all African Americans in Wisconsin reside in the City of Milwaukee and 27% of Asians reside in Milwaukee County.) Researchers

found elevated rates of infant mortality, low birth weights, premature births, and elevated death rates from breast cancer, colon cancer, and lung cancer (Kaplan, Center for Public Integrity, February 2008). Wisconsin has five EPA-designated areas of concern associated with the Great Lakes, including Green Bay, Milwaukee and Sheboygan, which are home to a majority of the state's Hmong and African American populations.

b. "*The Wisconsin Minority Health Report 2001-2005*," produced by the Wisconsin Minority Health Program, found that African American populations in Wisconsin (73% of which reside in Milwaukee) had higher rates of diseases and deaths than the state's white population. The most telling observation was the health gap between African Americans compared to whites for leading causes of mortality and morbidity. The data shows that, during 2001-2005, minority communities were disproportionately impacted by adverse health outcomes as follows:

- Cancer, heart disease, injury, stroke and homicide were the leading causes of death in the total African American population in Wisconsin.
- Wisconsin African Americans had mortality rates that were higher than the state population.
- African American males had the highest rate of mortality from cancer of any race, ethnic, or gender group in Wisconsin. Cancer mortality rates among African Americans in Wisconsin were higher than national rates.
- An estimated 13% of African Americans in Wisconsin have been diagnosed with asthma; this is higher than the statewide percentage of 9%..
- About 9.7% of Wisconsin African American children tested for lead had blood lead poisoning, compared to 3.4% of other children tested.

In Milwaukee County, there are 3,270 "open" (i.e., needing clean up) or "conditionally cleaned up" properties – the highest number in the state. Despite the development pressure in the early part of the decade, the state's most populace county continues to have the highest concentration of contaminated properties, coupled with the largest economic and public health challenges.

b. Financial Need

(i) Economic Impact of Brownfields on Wisconsin. The Wisconsin Brownfields Coalition is seeking \$1 million in statewide assessment funds to address both rural and urban, inner-city brownfields properties, estimated at 7,000 properties. Wisconsin is generally considered a "rural" state, based on the Office of Management and Budget's metropolitan county designation criteria. Approximately 32% of the state's population lives in rural areas, as compared to the national average of 20% (US Census Bureau 2000 census data). Wisconsin has three cities with a population greater than 100,000, one of which is Milwaukee. Despite the "rural" nature of the state, the state ranks first in manufacturing employment.

The annual "discovery" of approximately 500 new brownfields properties is directly tied to the continuing downturn of Wisconsin's economy. As companies close, contamination is discovered and reported to WDNR. Companies that are looking to expand to neighboring properties are facing environmental and financial challenges left by their former neighbors. The state continues to struggle economically, as is summarized by this financial data:

- As of September 2009, Wisconsin leads the nation in manufacturing employment. (US Bureau of Census)
- Wisconsin's unemployment rate is 8.4%. (August 2009 US Bureau of Labor Statistics)

- In 2006, the state ranked 4th nationally in mass layoff offs and plant closings (Corporation for Enterprise Development Report).
- Since 2005, four hundred businesses have notified the state that they planned to close; 200 of those since January 1, 2009. (Wisconsin Department of Workforce Development)
- Since December 2007, the state has lost 140,000 jobs, 66,000 of those in manufacturing. This loss represents an eighth of the manufacturing base. (COWS State of Working Wisconsin 2009)
- Wisconsin's economic growth has fallen off the national pace, as the national income per capita exceeds Wisconsin by \$2,500 and the gap is growing. (The State of Working Wisconsin 2008 report – Center on Wisconsin Strategy)
- In 1979, Wisconsin median workers earned a wage well over the national average. By 2008, Wisconsin's median hourly wage was again below the national average. The median hourly wage in 2008 was 32 cents higher than it was in 1979. (COWS "State of Working Wisconsin" 2009)
- Wisconsin's median family income has fallen at an annual rate of 1.5% per year, while the national family income has fallen at half that rate (COWS Report 2008). Wisconsin's per capita personal income of \$37,314 lags behind the national average of \$39,751, ranking Wisconsin 28th among the states. (US Bureau of Labor Statistics)
- Milwaukee has the fifth highest African American male unemployment rate amongst 35 of the largest metro areas. The jobless rate for African American males (18-25 years) was 4 times the rate for the same age group in the Milwaukee's suburban areas. (UW Milwaukee "Race and Male Joblessness in Milwaukee 2008," Mark V. Levine, Sept 2009).
- Wisconsin ranks 48th (3rd lowest) out of 50 states in per capita federal aid provided to each state. For example, if the state would have reached the national per capita average for federal aid (\$8,904 per capita), there would have been a \$5.9 billion boost to Wisconsin's economy in 2008. (Northeast Midwest Institute and US Bureau of the Census)
- A *Wall Street Journal* survey of the first \$200 billion allocated to the states found Wisconsin ranked 45th (5th from the bottom). (*Isthmus* newspaper, "State of Chumps," 10/09/09)
- According to the Corporation for Enterprise Development (2009-10), Wisconsin ranks 51st in small business ownership, 42nd in women business ownership, 50th in minority business ownership, and 49th in business creation. It ranked 44th in homeownership by race.

Inner-city, urban communities in Wisconsin continue to struggle with the impacts of the most-recent economic downturn, including the persistent increase in brownfields, crime, poverty and lack of job opportunities. The state's urban areas - such as Racine, Milwaukee and Rock County - are in need of assessment funds due to the closing of dozens of manufacturing plants. The unemployment rate in Beloit is 17.4% and in Janesville it is 13%, mostly due to the shutdown of two automotive plants and the related satellite businesses. The unemployment rate in Racine is 16.2%, while Milwaukee's unemployment rate is 11.9%. The state rate was 8.4%. The City of Milwaukee is an especially important target community for brownfields funding. According to a September 28, 2009 Milwaukee Journal Sentinel article, Milwaukee has the 11th-highest poverty rate among large U.S. cities, with more than 132,189 people (23.2%) living below the federal poverty line. Almost 32% of the children in Milwaukee live in poverty. The city has the state's highest population of African American and Asian residents. In Milwaukee, 20,000 children have one or both of their parents incarcerated. While Milwaukee's unemployment rate is lower than some other Wisconsin communities, the unemployment rate does not take into account the sector of the population that have stopped actively looking for employment or the underemployed.

The Corporation for Enterprise Development (CED) publishes an annual report card for the states. The report notes that in 2009 that Wisconsin trailed most of the other states in new companies created, by finishing near the bottom (ranked 49th). The hundreds of brownfields sites that were created during the mass plant closings of the last decade will take years, if not decades, to address. As summarized in Wisconsin’s Workforce Investment Act State Plan (2005-07), “Wisconsin is in the process of recovering from one of the worst economic recessions since the mid-1980s, having lost 80,000 manufacturing jobs since 2000.” This was written a year before the September 2008, financial crisis and is supported by the warning in the 2008 COWS report, which states, “We are likely slipping into a new recession before family income recovered from the old one (i.e., recession.)” Since 2007, Wisconsin has lost an additional 140,000 jobs. In total, since 2000, Wisconsin has lost 25% of its manufacturing base, which generally are the “living-wage” positions with health benefits in urban and rural communities.

Some of the significant recent plant closings in rural and urban areas of Wisconsin include:

Community	Type of Company	Population (2007 est.)	Number of Workers Affected
Albany	Manufacturer	1,058	110
Appleton	Tableware	70,017	300
Beloit	Auto Industry	37,710	293
Broadhead	Manufacturing	3,080	184
Janesville	Auto Industry	65,000	2,000
Kimberly	Paper Industry	6,146	530
Mosinee	Door Manufacturing	4,043	368
New Holstein	Manufacturing	3,301	320
Niagara	Paper Mill	1,742	320
Oak Creek	Auto Industry	33,212	300
Port Edwards	Paper	1,944	501
West Allis	Iron Foundry	59,763	215

Thus, one of the target areas for these assessment funds is rural parts of the state where manufacturing facilities have ceased operation. The number of known brownfields sites in rural Wisconsin is significant. Of the 4,350 known contaminated sites that have yet to be cleaned up, 28% are located in rural areas (WDNR’s Bureau for Remediation and Redevelopment Tracking System). It is especially challenging to encourage the cleanup and redevelopment of the many brownfield sites in rural communities. Unlike sites in major metropolitan areas of the state, the real estate market and economic climate of smaller cities and rural areas is much less robust. There are fewer businesses seeking industrial and office space for their operations, there is a smaller demand for condos and new housing, and there is inexpensive undeveloped land available for development within close proximity of the center of town. As a result, these sites are significantly less likely to be cleaned up by the private sector and need public financial investment in order for cleanup to occur.

ii. Economic Conditions in Wisconsin. In 2009, Wisconsin faced a \$6.6 billion budget deficit. In June 2009, Governor Jim Doyle signed the state \$61 billion budget, which included \$3 billion in reductions to state agencies - the deepest cuts in the state’s history. Presently, Wisconsin is ranked as one of the top 15 states for having the worst 2010 state budget gap (National Conference of State

Legislatures). The projected 2010 gap of revenues was 17.2% of the general fund, or \$2.5 billion. In September 2009, Wisconsin's Department of Revenue reported a \$1 billion drop in tax revenues from those collected in the previous year. According to the state Department of Administration, the Wisconsin budget deficit is projected at \$5.7 billion. A great share of this deficit is due to the decrease in individual tax revenues. For example, the individual tax revenues in April 2009 had decreased 35.8%, or \$317 million from the previous year (Wisconsin Fiscal Bureau May 2009 revenue projections). This decline coupled with the decline in corporate and franchise taxes have compounded the severity of the current economic situation.

In response to this situation, the first round of budgetary actions taken by the state to address this \$6.6 billion deficit that impact the state's brownfields initiatives and its ability fund environmental assessments and site investigations include:

- \$4.5 million dollar anticipated reduction in the WDNR's fund to pay for assessments, investigations and cleanups where there is no willing or financially viable responsible party. This represents a 70% decrease in funds for this biennium.
- \$1,000,000 (or 100%) reduction in the WDNR's brownfields green space and public facilities grant program.
- At present, a \$630,000 decrease in state brownfields grant funds available per year for assessments, investigations and demolition. These funds may be cut by up to 100% given revenue projections.

All of these reductions impact Wisconsin communities' abilities to start or finish assessment activities at brownfields. For this current biennium (from July 1, 2009, to June 30, 2011) Wisconsin will have lost more than \$6 million in state brownfields funds. According to the Northeast Midwest Institute's (NEMWI) draft report, *The Environmental and Economic Impact of Brownfields Redevelopment* (July 2008), "public investments in brownfields leverage total investments at a ratio of approximately \$1/public investment to \$8/investment." The report states that "brownfield sites in severely distressed areas (citing Milwaukee as an example) require higher subsidy levels, as much as double the ratios indicated here." In essence, the state has lost at least \$48 million in leveraged funds, with the direct loss of the \$6 million in state brownfields funds.

WDNR has four, federal \$200,000 assessment grants that are targeted to the partnership that the WDNR has with the City of Milwaukee for the 30th Street Industrial Corridor. 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"). The 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.

To date, the WDNR has spent \$550,000 of the \$800,000 in EPA assessment funds awarded since 2006 within the Corridor. The funds have been used to conduct 50 Phase I assessments, 25 Phase II assessments, 1 multi-property (area-wide) groundwater investigation and outreach activities (e.g., web site, open house, publications). Given the magnitude of the social, economic and environmental challenges in this predominately African American neighborhood, the WDNR has chosen to not

expand the scope of these federal assessment funds outside the original boundaries of this partnership. The WDNR estimates that these funds will be exhausted by September 2010.

2. Project Description and Feasibility of Success

a. Project Description – Wisconsin Plant Recovery Initiative

The WBC is seeking \$1 million for a coalition assessment grant - \$800,000 in hazardous substance funds and \$200,000 in petroleum funds - to target manufacturing plant closings and bankruptcies that have occurred since 2000. According to state records, since 2000, over 800 businesses have notified the state of a plant closing. The WDNR and its sister agencies are undertaking a new effort, entitled the Wisconsin Plant Recovery Initiative (WPRI). This initiative entails a coordinated, proactive approach to identifying, screening for health/environmental emergencies, reaching out to, and financially assisting the multitude of closing, closed and bankrupt manufacturing plants and the communities where they reside. The goal of WPRI is to proactively deal with the hundreds of closed plants in a manner so as to accelerate an economic recovery that would otherwise take decades to achieve.

WPRI entails a coordinated, proactive approach to addressing what the WDNR believes is a “new generation” of brownfield sites. Due to the international economic collapse, a historic number of small and large manufacturing facilities have closed their doors in Wisconsin. Given that Wisconsin is in the number one state in manufacturing employment (US Bureau of Labor Statistics Sept. 2009) and was 4th highest state in plant closings (2006 CED), logically there is a large number of closed facilities where there is known or perceived environmental contamination. The WDNR is hoping to successfully acquire a \$1 million assessment coalition grant in order to offer eligible property owners and communities funding to assess these properties and expeditiously move them back into productive use.

WPRI is simply a process of proactively identifying closed/closing/bankrupt plants and offering assistance across numerous WDNR environmental programs to cooperative and uncooperative plant owners and the impacted communities. In Wisconsin, when a plant with more than 50 employees is planning to close, the owners are required by state law to notify the state. Once the plant owner notifies the state, the general WPRI process will proceed as follows:

- (1) Department of Workforce Development faxes WDNR notice within 24 hours;
- (2) WDNR adds plant to tracking spreadsheet;
- (3) WDNR staff check air, waste, clean up, wastewater and water supply data bases to determine if WDNR has a regulatory interest in the plant (next steps apply even if no regulatory interest as it will likely be “perceived” as a brownfields);
- (4) triage screening check list is filled out by WDNR to determine any health/emergency concerns and confirm regulatory status – such as ongoing remediation systems, land use controls, air permit issues, waste storage, and possible emergency health issues (e.g., electroplater with hundreds of drums on site);
- (5) letters sent to plant and community within 7 days;
- (6) follow-up calls within 14 days by WDNR regional supervisor with offer of assistance;
- (7) if amenable, meet with plant owners and community, and offer technical and financial assistance to the plant/community or if not amenable or non-responsive, WDNR will follow up with second letter, and will meet with community if they request;

(8) Technical assistance from all WDNR regulatory programs will be available in a single, coordinated effort to assist the plant owners in complying with the necessary, safe decommissioning of the facility; and

(9) Financial assistance – state and federal - will be offered to assist those property owners and communities that would like to address any known or unknown environmental.

WDNR would like to offer state and federal financial incentives to communities and plant owners in order to accelerate the assessment of known or perceived environmental contamination at these closing, closed and bankrupt properties. The WDNR, if successful, would like to incorporate the \$1 million in EPA assessment funds into the WPRI program. After discussions with its partners, WDNR is proposing to offer these funds to Wisconsin's: (1) hardest-hit communities, such as Beloit (17% unemployment), Janesville (13%), Milwaukee (11.9%) and Racine (16.2%); and (2) for specific closed, closing or bankrupt manufacturing sites. The funds would be used to conduct Phase I environmental assessments compliant with all-appropriate inquiry standards, Phase II environmental assessments, site investigations and to prepare a limited number of remedial action plans. The goal would be to deal with immediate public health issues, to protect the environment and to spur economic recovery for these communities.

It is the WDNR's belief, based on discussions with its stakeholder group, that providing financial assistance, rather than relying *solely* on traditional enforcement tools, will accelerate the number of communities and property owners proactively moving forward to address known or perceived contamination situations. Clearly, these funds may only be used at eligible properties. WDNR has a long tradition of working closely and cooperatively with EPA Region V on site eligibility issues. If WDNR can offer a closing plant owner or the impacted community help with Phase I and II environmental assessment contractor services at an eligible site, it will only accelerate an economic recovery in Wisconsin. Without these funds, WDNR and its stakeholders fear that these properties will remain abandoned and blighted for years, posing a public health, environmental and economic challenge that the state and local governments do not have the funds to address.

b. Budget for EPA Funding and Other Leveraged Resources

(i) The WBC is requesting \$1 million in assessment funds: \$800,000 for hazardous substance and \$200,000 for petroleum-only sites. The WBC anticipates assisting with the assessment of at least 50 closed, closing or bankrupt plants. As is outlined in the table below, the WBC anticipates that there will likely be a greater need for environmental assessment funds than full site investigation funds. Thus, a greater share of the proposed budget has been allocated to Phase I and II assessments.

Activities likely to be funded with the \$800,000 in hazardous substance funds include 30 Phase I environmental assessments that are compliant with EPA's all-appropriate inquiry standard/Bona Fide Prospective Purchaser standard, 23 Phase II environmental assessments; and 5 site investigations, each combined with a remedial action options plan. The \$200,000 in petroleum assessment funds should be able to fund 20 Phase I assessments and 14 to 16 Phase II assessments. No funds for petroleum site investigations are budgeted, as the state's Petroleum Environmental Compensation Fund Act (PECFA) pays for investigations, but not Phase I/II assessments. The WBC does not plan to utilize the funds for inventory or planning. The WDNR will utilize its s. 128(a) funds to support staff administration of the funds.

Table: Budget for 1\$M in Hazardous Substance and Petroleum Contractual Funds

Funding Category	Project Tasks				Totals
	Phase I Assmts: (\$3,500 each)	Phase II Assmts: (\$15,000 each)	Site Investigations: (\$60,000 each)	Remedial Action Plans: (\$5,000 each)	
Hazardous Substance Contractual Funds	30	23	5	5	\$800,000
	\$100,000	\$350,000	\$300,000	\$50,000	
Petroleum Contractual Funds	20	14+	-	-	\$200,000
	\$50,000	\$150,000	-	-	
Total Contractual Dollars:					\$1,000,000

ii. Leveraging: Wisconsin has a number of brownfields financial incentives that can be used to leverage funds to complete the required work at properties that receive federal brownfields assessment grant funds. One of the key leveraging “tools” the WDNR employs is “green team” meetings, which are meetings between state agency staff, local government staff and oftentimes EPA and any potential developer. State staff (WDNR, Commerce, Transportation and others) meets with interested communities about challenging properties or projects. State staff works hand in hand to put together a “package” of multi-agency financial incentives that could assist with the overall project. Staff works to ensure that funds do not over lap, and that sufficient funds are available to finish each project.

On an annual basis, the state has \$9 million in state brownfields grants for local governments and the private sector. One of the most popular sources of state brownfields funds is WDNR’s Brownfield Site Assessment grant (SAG) program, which has \$1.5 million annually. (Given the state of the Wisconsin economy, these funds may be partially or fully eliminated this spring.) If these state funds are available, the WBC envisions jointly utilizing both state SAG funds and federal assessment funds at targeted projects. While the federal funds can pay for the traditional assessment work needed, SAG can fund demolition, removal of above-ground containers and underground storage tanks. The Departments of Administration and Transportation also have funds available for assessment and cleanup for eligible projects, respectively associated with the Great Lakes and transportation. Commerce’s \$6 million a year in brownfields grants can pay for site investigations and cleanups.

Further, the WDNR has limited cleanup funds remaining in its \$6 million dollar traditional (non-ARRA) EPA brownfield revolving loan fund. WDNR has been successful in loaning or sub-granting these clean-up dollars to eligible projects. The state’s petroleum clean-up fund provides limited dollars to assist in the cleanup of leaking underground storage tanks (\$25 million annually), and the state has a dry cleaner response fund (\$1 million) to assist with the costs of cleaning up these historic sites. About \$2 million is available annually for cleanup at agricultural contamination sites (former agricultural cooperatives), which can be brownfields.

Finally, Wisconsin has a number of other incentives that leverage funds, including: (1) remediation tax credits; (2) property tax forgiveness provisions; (3) and the federal tax deduction. These are

incentives that help on the “back-end” of a project, and can oftentimes be more crucial to a project’s success than a front-end grant. For the third time in four years, the Wisconsin Community Development Legacy Fund (WCDFL), a nonprofit organization formed by the Wisconsin Housing and Economic Development Authority, Legacy Bancorp and Impact 7, has received \$100 million federal New Markets Tax Credit allocation. Also, Wisconsin has streamlined its tax incremental financing laws to assist with urban renewal, including the creation of a TIF solely for brownfields. Local governments have created 16 environmental TIFs; the tax increment is used to reimburse the local government for eligible brownfields costs (including assessment costs).

The state has an excellent record of leveraging state funds with federal funds to successfully complete projects. For example, the WDNR’s \$6 million traditional brownfield revolving loan fund (Ready for Reuse) has partnered successfully with other state grant programs in order to leverage assessment funds and additional cleanup funds. Four Ready for Reuse projects have received state brownfields grants totaling \$1,623,000 from the Wisconsin Dept. of Commerce. Six Ready for Reuse Projects have received \$368,927 in grants from the WDNR Site Assessment Grant Program, and one project received a WDNR Green Space & Public Facilities grant for \$50,000.

Programmatic Capability

i. Experience. The WDNR has extensive experience in the management of federal grants, loans and cooperative agreements. 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 WDNR’s Remediation and Redevelopment (RR) program manages 15 federal grants, with an annual budget of over \$4 million for more than 17 years. The RR program has received:

- Superfund Core Brownfields grants from October 1994 through June 2005.
- CERCA Section 128(a) State Response Program grant (over \$5M) from September 2003 through the present.
- EPA Revolving loan grant awarded in 2004, and supplemented in 2007 and 2009, for a total of \$6 million. An additional \$2 million American Recovery and Reinvestment Act award.
- EPA Brownfields Assessment Grants totaling \$1,800,000, in 2005, 2007, and 2008.
- EPA LUST, RCRA Hazardous Waste, and other Superfund grants for over a decade.

The WDNR has a record of wisely using federal funds that EPA has awarded within the terms of the grant schedule. WDNR receives s. 128(s) funds on an annual basis to support staff efforts to implement the WDNR’s brownfields initiative. Since 2003, all funds awarded to the WDNR have been utilized in accordance with the work plan and schedule, with no funds carried over into the next fiscal year. Since 2004, WDNR has received EPA brownfields revolving loan funds for a total of \$6 million. To date, WDNR has contractually obligated or has pending awards that total approximately \$5.3 million; only \$563,000 in petroleum funds and \$263,000 in hazardous substance funds remain available to grant or loan out. The cooperative agreement period ends September 2012. For the \$800,000 in assessment funds, the WDNR has fully completed expenditures in one of the \$400,000 cooperative agreements, and has \$250,000 remaining of the \$400,000. WDNR anticipates that the \$250,000 in assessment grant funds will be expended by September 2010. With respect to the \$1 million in assessment funds awarded in 2009, WDNR fully expects to have those funds obligated to a specific community or site-specific project by summer 2010.

WDNR has consistently completed the following activities for each of these grants: (1) quarterly, semi-annual and annual 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. For both the brownfield revolving loan fund grant and the assessment grants, WDNR has completed the required property profiles and entered them into ACRES. The WDNR has an excellent working relationship with EPA Region V staff, and have conscientiously filed timely reports to EPA, followed work plans and met agreed upon schedules.

Accomplishments: To date, the WDNR has spent \$550,000 of the \$800,000 in EPA assessment funds conducting 50 Phase I assessments, 25 Phase II assessments, 1 multi-site groundwater investigation, and outreach activities (e.g., web site, open house, publications). With the \$5.5 million in revolving loan funds, the WDNR has provided 2 loans and 11 grants for almost \$2.7M. In addition, WDNR is finalizing 2 additional loans for over \$1.5M and 2 additional grants for \$203,000. The WDNR utilizes its s. 128(a) funds to help administer state grant programs. Over a 10-year period, WDNR has: (1) reviewed 781 state assessment grant applications requesting \$31.7M, and awarded 440 grants for \$15M; and (2) awarded 21 cleanup grants for a total of \$2.1M where all or a portion of the property will be for green space or another public use. To date, the WDNR has conducted over 278 land use control audits, to ensure clean-up remedies remain protective.

Staff Expertise: This EPA grant will be managed by the RR Program within WDNR to ensure it complies with prudent fiscal practices. Loan and grant agreements will be awarded and tracked by staff that has over 15 years of experience managing loan and grant programs. Darsi Foss, Chief of the Brownfields and Outreach Section in the Bureau for Remediation and Redevelopment at the WDNR, will be the Program Coordinator for this grant. Ms. Foss has worked for EPA and WDNR since 1985. She has twelve years of experience directly administering EPA program cooperative agreements, and 10 years experience administering brownfields funds to local governments. Shelley Fox, the RR Program's brownfields grant manager, has 11 years of fiscal experience, and dedicates her efforts to tracking funds and ensuring that the program adheres to state and EPA's financial regulations. Melissa Enoch, the newest member of the WDNR's brownfields team has 4 years experience managing federal education grants. The WDNR has adopted a "team" approach to the administration of federal grants to ensure continuity of services. The WDNR's 40 highly experienced hydrogeologists will be involved with the technical oversight of each cleanup project. The majority of the technical staff has 10 years or more of experience managing environmental projects. The WDNR will use the fiscal and grant management systems it has in place for its state and federal brownfields funds to administer the project selection, award, reimbursements and reporting of these federal funds. The WDNR's remediation and redevelopment program been competitively procuring goods and services and professional services contracts since the late 1980's.

Audit Findings: OMB Circular A-133 Audit findings have been very positive. 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 (March 2009) of WDNR for state fiscal years 2007 and 2008 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. Community Engagement and Partnerships

a. Plan to Involve Affected Community. The WBC will utilize the WDNR's new Wisconsin Plant Recovery Initiative (WPRI) as the basic framework for community engagement and establishing partnerships. The WBC's definition of "targeted community or audience" will include - but will not be limited to - the following entities impacted by closed, closing or bankrupt manufacturing facilities: (1) communities; (2) impacted residents; (3) state agencies, such as Commerce, Health, Justice, Transportation, WHEDA and Workforce Development; (4) community workforce development boards; (5) municipal, labor and business associations; (6) US EPA – Superfund remedial and removals program, as well as brownfields program, EDA and ATSDR; (7) regional planning commissions; (8) Wisconsin Brownfields Study Group; (9) community-based groups; and (10) other partners.

As previously mentioned, WPRI is simply a process of proactively identifying closed, closing and bankrupt manufacturing plants and offering coordinated state agency assistance across numerous environmental programs - to both cooperative and uncooperative plant owners and the impacted communities. In Wisconsin, when a business with more than 50 employees is planning to close, the owners are required by state law to notify the state. The WDNR will also use the WPRI process at manufacturing businesses with less than 50 employees that close their operations.

Once the WDNR is notified of a plant closing or bankruptcy, the general WPRI process will entail: (1) WDNR adding plant to tracking spreadsheet; (2) WDNR staff checking air, waste, clean up, wastewater and water supply data bases to determine if WDNR has a regulatory interest in the plant (next steps apply even if no regulatory interest as it will likely be "perceived" as a brownfields); (3) conducting triage screening check list – a list filled out by WDNR to determine any health/emergency concerns and confirm regulatory status – such as sensitive populations, ongoing remediation systems, land use controls, air permit issues, waste storage, and possible emergency health issues (e.g., electroplater with hundreds of drums on site); (4) letters sent to plant and community within 7 days; (5) follow-up calls within 14 days by WDNR with offer of assistance; (6) if amenable, meet with both plant owners and community, and offer technical and financial assistance to the plant/community or if not amenable or non-responsive, WDNR will follow up with second letter, and will meet with community if they request; (9) Technical assistance from all WDNR regulatory programs will be available in a single, coordinated effort to assist the plant owners in complying with the necessary, safe decommissioning of the facility; and (9) Financial assistance – state and federal - will be offered to assist those property owners and communities that would like to address any known or unknown environmental. As part of the WPRI process, we will be fostering and advocating for community engagement in the process of assessing, cleaning up and redeveloping these former manufacturing facilities.

The WBC, with the WDNR in the lead, will address any communication barriers that arise on specific sites. The WBC will utilize its community organization partners, such as the University of Wisconsin-Milwaukee, Midwest Environmental Advocates, 30th Street Industrial Corridor Corporation and other entities to provide direct resources or references to overcome cultural language barriers. WDNR currently has site warning signs in various languages, and has translation

resources to convert documents and web text to Spanish or Hmong. WDNR also has Spanish and Hmong interpreter resources. In addition, many of the DHS health publications are available in English, Hmong and Spanish. The WBC will meet with communities and impacted residents, and bring together appropriate state agency staff (WDNR, Commerce, Health, Transportation, etc), as well as federal agency resources (e.g., ATSDR, EPA), to discuss the technical, financial, liability and health issues associated with specific sites. WDNR and its partners conduct over 50 such meetings a year with local governments.

b. Local, State, and Tribal Partnerships with Environmental and Health Agencies.

Since its inception in 1995, the Remediation and Redevelopment Program has operated as a cooperative venture with the support of other state, federal and local government partners. The WBC plans to employ this partnership model in developing and implementing the \$1M assessment and the WPRI program. The partners and their respective roles and resources:

- **Wisconsin Department of Health Services (DHS):** The WBC will work with local and state public health officials to ensure that cleanup and redevelopment activities are protective of public health and the environment. WDNR has an excellent working relationship with DHS Division of Public Health staff. DHS staff provides a number of environmental health services, including health consultations, fact sheets, and meeting resources.
- **Wisconsin Department of Natural Resources (WDNR):** The WDNR will provide the technical expertise on ensuring that the investigation, cleanup 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.
- **Agency for Toxic Substances and Disease Registry (ATSDR):** The staff of ATSDR has been very involved and supportive of the state's brownfields efforts and of Wisconsin communities in general. ATSDR, in conjunction with these partners, recently published: "*Building Healthy Communities: A Baseline Characterization of Milwaukee's 30th Street Corridor.*" This report documents the "baseline conditions" in the Corridor, so that as brownfields projects are revitalized, the partners can better quantify the quality of life improvements. In addition, ATSDR, DHS, EPA and WDNR are partnering with the City of Baraboo, Wisconsin, on a health monitoring component of their EPA brownfields assessment grant.
- **Other agencies:** The WBC will work with other state agencies, such Workforce Development, WHEDA, Administration, Commerce and Transportation. One of the key tools the WDNR employs are "green team" meetings. These are meetings between state agency staff, local government staff, and oftentimes EPA and any potential developer. State staff meets with interested communities about challenging properties and put together a "package" of multi-agency, financial incentives that could assist with the overall project. Staff works to ensure that funds do not overlap, and that sufficient funds are available to finish the project. The WBC will continue to use the green team meetings to promote face-to-face communications and the development of partnerships.
- **Regional planning commissions:** Wisconsin's Regional Planning Commissions (RPCs), three of which are official members of the WBC, provide planning assistance on regional issues, assist local interests in responding to state and federal programs, act as a coordinating agency for

programs and activities, and provide planning and development assistance to local governments. Specific examples of RPC services include comprehensive community plans, grant writing, geographic information system map production, revolving loan fund administration, economic development planning, socio-economic data collection, park and open space planning, solid waste management planning and environmental planning.

c. Community-based Organizations. As previously mentioned, the targeted community for these funds will be specific sites and communities impacted by closed, bankrupt and closing manufacturing plants. It is challenging to tie community-based organizations to a statewide effort, as these groups generally focus on a specific project within a community. In order to meet this challenge, the WBC has developed a model that is intended to: (1) educate local governments, former manufacturing plant owners and impacted residents about the state's brownfields initiative and resources available (i.e., technical, financial and health-related) to the community; and (2) provide further support to the community-driven project, once funds have been awarded.

The WBC realizes that undertaking a proactive, coordinated approach to dealing with the historic number of plant closings and bankruptcies is unprecedented. Thus, a fundamental component of WPRI will be to engage in partnership with the following community-based partners (Attachment C):

- The Wisconsin Brownfields Study Group (BSG), an 11-year old state advisory group, will continue to help develop the program and target specific communities. The BSG is comprised of brownfields practitioners – mayors, planners, developers, health non profits, consultants, association members, attorneys – that assist the WDNR and other state agencies on policy and legal issues. The BSG can provide advice to the WBC and communities receiving the funds, and support efforts to leverage more funds to achieve the communities' goals.
- Neighborhood and statewide advocacy groups, like the 30th Street Industrial Corridor Corporation and 1,000 Friends of Wisconsin, may offer opportunities to market the initiative, identify sites, and leverage more involvement by the community. These groups could be mobilized to assist the WBC in identifying those “if not for the community” kind of projects. Without the activism of these groups, many sites would not be identified or assessed as quickly. The WBC can also reciprocate by connecting these groups with resources, such as the state and federal health staff.
- Educational institutions and research entities, such as UW-Milwaukee and the Center on Wisconsin Strategy (COWS), can continue to serve as resources for communities and for public policy advice. The UW's statewide cooperative extension system can also provide meeting space, communication resources, and access to the University's economic development extension agents for community-based assistance. COWS is seeking active partners in the state's efforts to transform Wisconsin's economy. Another resource is student assistance. A landscape architecture class developed a streetscape plan for a major transportation artery, and an urban planning class compared the existing neighborhood plans with the comprehensive plan in order to identify future land use goals.
- Local business and labor groups to assist with the efforts. The 11 workforce development boards across the state are a resource for assisting the WBC in identifying plants, communicating with the owners and communities, and by providing other economic expertise. Local labor groups (AFL-CIO) can assist in helping with site-specific information about plants. Further, local and

state business groups, such as manufacturing associations and chambers of commerce can assist in marketing and educational outreach.

4. Project Benefits

a. Welfare and Public Health

The receipt of these funds will guarantee that more contaminated properties in Wisconsin will be assessed and cleaned up in the next 5 years, thus halting public health exposures and preventing further environmental degradation. Seventy-five percent of Wisconsin residents rely on groundwater as their primary source of drinking water. There are still more than 750,000 private wells in this state, as well as hundreds of municipal wells, which are vulnerable to contamination migrating from uncontrolled brownfield properties. If the WDNR's Site Assessment Grant sites are an indication of public welfare and health concerns, it is cause for concern: (1) of the 440 state-funded SAG grants awarded, over 90% of sites were within 500 feet of a school, park or residence; and on average 75% of the grants awarded had a demonstrated environmental (e.g., direct contact) or physical hazard (e.g., blighted building with evidence of trespassing).

Urban areas with a heavy concentration of manufacturing facilities - like Milwaukee, Racine, Janesville and Beloit - are likely challenged by the numerous health issues. For example, in Milwaukee's 30th Street Industrial Corridor, which is home to over 200 known brownfields sites, child lead poisoning is large public health threat. Statistics show that in 1998, 19.5% of the children tested in Milwaukee had blood lead levels equal to or above 10 µg/dL (micrograms per deciliter), the lead poisoning threshold. This is about 5 times the national average of 4%. (State DHS Data) Blood lead data collected by the DHS also show that neighborhoods along the 30th Street Corridor have the state's highest concentration of lead-poisoned children. Residents of these neighborhoods also have elevated rates of hospital visits to treat asthma. These higher rates of asthma are greatly affected by poor living conditions and indoor air quality often found in the old housing stock of the 30th Street area. These sub-standard health conditions and unacceptable exposures are present in a neighborhood that has the fewest resources available (i.e., access to health care and insurance, as well as living wage jobs) to deal with such health concerns.

The WBC will work with local and state public health officials to ensure that assessment, clean-up and redevelopment activities are protective of public health and the environment. WDNR has an excellent working relationship with Wisconsin Department of Health Services (DHS), Division of Public Health's staff. DHFS staff provides a number of 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 chemical-specific (e.g., lead and arsenic) or exposure pathway (e.g. vapor intrusion) risks and how they impact cleanup and redevelopment options; and (3) presence at public meetings to answer questions from public on health impacts.

The WDNR will provide the technical expertise for ensuring that the investigation, clean-up and redevelopment of these manufacturing plants 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. The WBC will also engage its community partners that are identified as part of site selection process to communicate with affected residents.

b. Economic Benefits and/or Greenspace

i. Economic Benefits. The WBC's proposal would create significant state, local and private investment in Wisconsin's fragile economy. Wisconsin estimates that this federal money could create an estimated \$8 in additional investment for every \$1 of public brownfields funds, for a total of \$8 million in leveraged funds. Additionally, the WBC expects that the property tax base to increase. (For example, almost 50% of the state assessment grant awards were to tax delinquent sites.) Results from the Wisconsin Dept. of Commerce's brownfields grant program is an example of the economic benefits the WBC hopes to achieve. Since 1997, Commerce has received 310 applications for \$159M in requests. Commerce has awarded 164 grants, for a total of \$64M. The matching investment was \$523M, with a projected increase in property values of \$1.7B. For every Commerce \$1, there was \$12 in additional investment. (Data: Wisconsin Department of Commerce)

It is important to note that there is a demonstrated need for additional brownfields cleanup dollars for economic projects in this state. The WDNR's Brownfields Site Assessment Grant has been able to award \$15 million for almost 440 projects. However, the WDNR has received requests for more than \$31.7 million in grants. WDNR had to turn away 50% of the grant requests; Commerce turned away 66%. The state is missing the opportunity to restore these formerly productive properties back into green space projects, public facilities, and housing and economic development projects. According to the Northeast Midwest Institute's draft "*The Environmental and Economic Impacts of Brownfields Redevelopment*" (E. Paul, July 2008), approximately \$1/public investment leads to \$8/total investment. It also estimates that \$5,700 in public funds leverages one job. Thus, the \$1M in EPA assessment funds would likely leverage \$8M in total project investment and 175 jobs.

ii. Greenspace. The Northeast Midwest's July 2008 draft report further estimates that for every acre of brownfields that is redeveloped, 4.5 acres are conserved. Wisconsin is one of the leading states in the disappearance of agricultural lands. (2006 CED Report) The \$1M from EPA, if awarded, would greatly relieve the development pressures on prime farmland. Last year, the average size of the 400 sites given final cleanup approval was approximately 4.5 acres. The WBC estimates that 40 projects would be put into the cleanup pipeline with the \$1M in assessment funds, and therefore the ultimate cleanup of those properties would result in an estimated 180 acres of preserved green space (40 projects x 4.5 acres). All local governments in Wisconsin must have smart growth comprehensive plans in place by 2010. The plan must include redevelopment priorities and economic development activities for brownfields. Awarding of these assessment funds will take into consideration whether the brownfield project is part of a comprehensive plan. The goal would be to create new business opportunities and public places consistent with the "smart growth" plans of Wisconsin communities.

c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

For all brownfields projects, environmental best practices and sustainable development activities are promoted by the WBC. When a community approaches the state for assistance with a brownfield project, a "green team" of state experts are brought together to meet with the community leaders and potential developers to discuss financial incentives and programs that could assist with the project. Best sustainable practices used at other brownfields projects will be shared and promoted with the

community, tribe or developer. In addition, sustainable practices, such as green buildings and innovative storm water treatment, will be promoted.

The reuse of existing infrastructure is one of the compelling reasons why federal, state and local governments are willing to commit public funds to these projects. Wisconsin has a tradition of working with local governments to identify projects that will maximize use of existing roadways, bus transportation, utility services, neighborhood centers and use of waterfront transportation modes. The WBC will team with the Wisconsin Dept. of Transportation (DOT) to identify projects their Transportation Economic Assistance (TEA) grants could assist brownfields with rail, road, harbor or airport work. In addition, DOT has funds to preserve historic sites (e.g., depots), pedestrian and bicycle facilities and paths, and abandoned rail corridors.

In addition, Wisconsin communities are utilizing resources state and non-profit resources to reuse or recycle building materials from brownfield projects. Communities like Delavan and Kenosha have creatively and cost-effectively used demolition materials (crushed cement and bricks) from large brownfields projects for on-site road projects, saving the communities thousands of dollars. WDNR has allowed a portion of its brownfield grants to be used to procure materials recycling plans from non-profit groups. A prominent non-profit, WasteCap Wisconsin, provides training, technical assistance and market research to promote the recycling of demolition debris and other non-hazardous materials.

Lastly, the state has developed the Wisconsin Initiative for Sustainable Cleanups (WISC). The first phase of this project is to evaluate state-lead cleanup sites and determine if there are more passive or sustainable ways to achieve site cleanup goals, such as alternative energy sources (solar) or biofuels. The state recently received a federal energy grant to incorporate solar power into one of the state's ongoing pump and treat systems for groundwater. The state provided brownfields grants to the City of Milwaukee to fund its award-winning storm water park.

c. Tracking and Measuring Progress

The WBC and the WDNR have an excellent track record of tracking and measuring the success of the state's brownfields initiative. The WDNR will ensure that the property profiles for the specific projects are completed in a timely manner, and entered into the EPA ACRES database. In addition, the WDNR will report quarterly to the EPA on the milestone achievements made in implementing the cooperative agreement. Staff time and administrative accomplishments will be reported semi-annually through the s. 128(a) cooperative agreement reports. As part of the cooperative agreement workplan, the WDNR will report outputs for the grant, such as the number of Phase I and II assessments, and site investigations initiated and completed. Specific grant outcomes will be negotiated with EPA, such as acres assessed, funds leveraged, tax base increase, jobs leveraged, percent of demolition materials recycled and sustainable practices implemented. These will be tracked by the WDNR cooperative agreement manager, and will be a reporting and reimbursement condition of any funding given to a local government. Finally, a web page will be created that can both market the initiative, and track and communicate its successes. WDNR will develop success story write ups based on the grants awarded, and post those to the web as well. All work will be tracked in WDNR's Contaminated Lands Environmental Action Network (CLEAN). Further, a separate "plant closing" spreadsheet has been developed to track these individual sites and the assistance provided.

<p style="text-align: center;">ATTACHMENT A: Documentation of Applicant Eligibility Wisconsin's Regional Planning Commissions</p>

Members of the Wisconsin Brownfields Coalition

The Wisconsin Brownfields Coalition members include the Wisconsin Department of Natural Resources and three of the state's Regional Planning Commissions (RPCs) (including five tribal members). These RPCs were established pursuant to s.66.0309, Wis. Stats., and perform planning, coordination and outreach functions for 24 of Wisconsin's 72 counties. Copies of the Executive Orders that created the RPCs are attached.

Wisconsin Department of Natural Resources

Matthew J. Frank, Secretary
101 South Webster St.
Madison, WI 53703

Northwest Regional Planning Commission

Myron Schuster, Executive Director
1400 S. River St.
Spooner, WI 54801

Created in 1959

Counties: Ashland, Bayfield, Burnett, Douglas, Iron, Price, Rusk, Sawyer, Taylor, Washburn, and the Tribal Nations of Bad River, Lac Courte Oreilles, Lac Du Flambeau, Red Cliff, and St. Croix

Southeastern Wisconsin Regional Planning Commission

Kenneth R. Yunker, Executive Director
W239 N 1812 Rockwood Dr.
PO Box 1607

Waukesha, WI 53187

Created in 1960

Counties: Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, Waukesha

West Central Wisconsin Regional Planning Commission

Jerry Chasteen, Director
800 Wisconsin St., Building D2-401, Mail Box 9
Eau Claire, WI 54703

Created in 1971

Counties: Barron, Chippewa, Clark, Dunn, Eau Claire, Polk and St. Croix

Original in

Received Times Jan. 10, 1959 2:59 PM
State Archives, WI

EXECUTIVE ORDER

THERE IS HEREBY CREATED, in accordance
with the provisions of Section 66.945(2) of the
Statutes, a regional planning commission, which
shall have jurisdiction in the counties of Ashland,
Dane, DeKalb, Iron and Price.

IN TESTIMONY WHEREOF I have
hereunto set my hand and
caused the Great Seal of
the State of Wisconsin to
be affixed. Done at the
Capital in the City of
Madison this second day of
January in the year of our
Lord one thousand nine
hundred and fifty-nine.



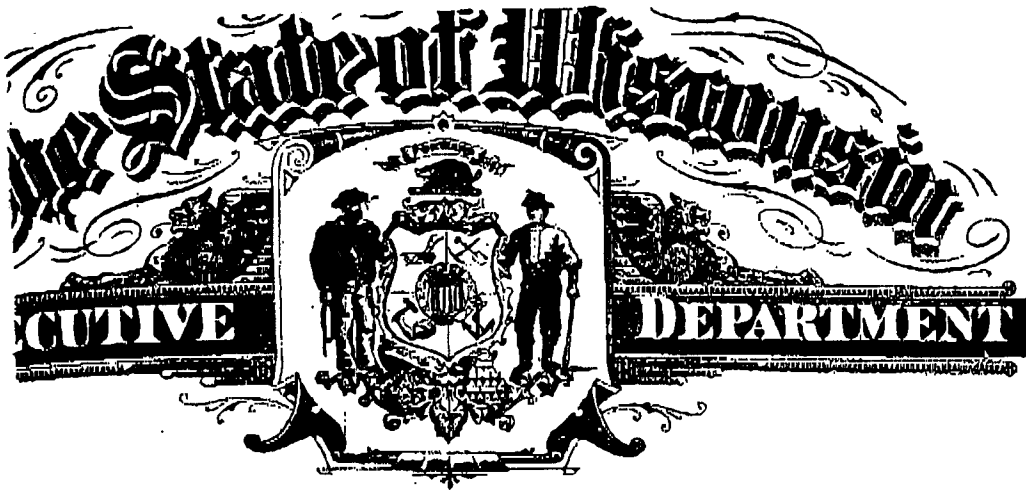
Leamon W. Johnson
GOVERNOR

Wm. Zimmerman
Secretary of State

**Wisconsin Governor Executive Order
Southeastern Wisconsin Regional Planning Commission
August 8, 1960**

The attached is a photocopy of an Executive Order issued by Wisconsin Governor Gaylord A. Nelson on August 8, 1960 establishing the Southeastern Wisconsin Regional Planning Commission. The original is in the Executive Record maintained by the Wisconsin Secretary of State and preserved in the Wisconsin Historical Society's Archives. This executive order is located in Volume 10 on page 445.

Jonathan Nelson
Archivist
Wisconsin Historical Society



EXECUTIVE ORDER

THERE IS HEREBY CREATED, in accordance with the provisions of Section 66.945 (2) of the Statutes, a regional planning commission, which shall have jurisdiction in the counties of Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington and Waukesha.

IN TESTIMONY WHEREOF I have hereunto set my hand and caused the Great Seal of the State of Wisconsin to be affixed. Done at the Capitol in the City of Madison this eighth day of August in the year of our Lord one thousand nine hundred and sixty.

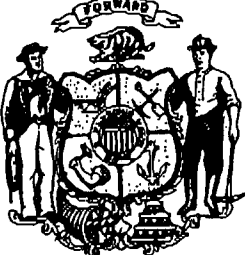
HOWARD A. NELSON
GOVERNOR

By the Governor:

ROBERT C. ZIMMERMAN
Secretary of State

UNITED STATES OF AMERICA

The State of Wisconsin



EXECUTIVE DEPARTMENT

EXECUTIVE ORDER NO. 11

THERE IS HEREBY CREATED, in accordance with the provisions of Section 66.945 (a) of the Wisconsin Statutes, a regional planning commission which shall be known as the West Central Wisconsin Regional Planning Commission which shall have jurisdiction in the counties of Barron, Chippewa, Clark, Dunn, Eau Claire, Polk and St. Croix.

IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the Great Seal of the State of Wisconsin to be affixed. Done at the Capitol in the City of Madison this 23rd day of March in the year of our Lord one thousand nine hundred and seventy-one.



R. L. P.



Patrick J. Lynch
PATRICK J. LYNCH
GOVERNOR

BY THE GOVERNOR:

[Signature]
SECRETARY OF STATE

Received Time Jan. 11. 2:07PM

**ATTACHMENT B: Documentation of Membership in the
Wisconsin Brownfields Coalition**



Northwest Regional Planning Commission

an economic development district

Serving communities within and counties of
ASHLAND • BAYFIELD • BURNETT
DOUGLAS • IRON • PRICE • RUSK
SAWYER • TAYLOR • WASHBURN
And the Tribal Nations of
BAD RIVER • LAC COURTE OREILLES
LAC DU FLAMBEAU • RED CLIFF • ST. CROIX

Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources
101 South Webster Street (RR/8), PO Box 7921
Madison, WI 53707-7921

SEP 8 2009

September 3, 2009

SUBJECT: Support for the Wisconsin Brownfields Coalition's Applications for \$1 Million in Brownfields Assessment Funds.

Dear Secretary Frank:

We are writing in support of the Wisconsin Brownfields Coalition's (WBC) 2009 applications to the Environmental Protection Agency for a federal brownfields assessment coalition grant. The Northwest Wisconsin Regional Planning Commission, representing the Counties of Ashland, Bayfield, Burnett, Douglas, Iron, Price, Rusk, Sawyer, Taylor and Washburn and the five Tribal Nations of Bad River, Lac Courte Oreilles, Lac du Flambeau, Red Cliff and St. Croix, is formally agreeing to continue as a member of the Wisconsin Brownfields Coalition, with the Wisconsin Department of Natural Resources as the grant administrator, for the purpose of applying for:

- \$1 M in EPA Brownfields Assessment Grant Funds to expand the services that the WBC provides to local governments to include federal assessment funds.

The estimated 8,000 brownfields are a significant obstacle in regaining Wisconsin's environmental and economic health. The WBC's grant would be used to assess and environmental contamination in areas where pollutants have been identified as a problem. After assessment, brownfields can be redeveloped so that growth occurs within "downtown" communities rather than sprawling into green spaces on the edges of towns. In Wisconsin, we have found these federal funds of significant benefit to rural communities and for inner city properties.

The brownfields grant application by the Wisconsin Brownfields Coalition is a good fit with our regional planning goals for several reasons:

- It supports sound land use management.
- It helps local governments take advantage of existing infrastructures.
- It promotes economic development in urban and in rural communities.
- It helps protect citizens from environmental pollutants.

If you have any questions, please feel free to contact me at 715.635.2197.

Sincerely,

A handwritten signature in black ink, appearing to read "Myron Schuster". The signature is fluid and cursive, with the first name "Myron" written in a larger, more prominent script than the last name "Schuster".

Myron Schuster
Executive Director

cc: Darsi Foss, DNR RR/5

SOUTHEASTERN WISCONSIN REGIONAL PLANNING COMMISSION

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September 16, 2009

Mr. Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources
101 South Webster Street (RR/8)
P.O. Box 7921
Madison, WI 53707-7921

Dear Secretary Frank:

We are writing in support of the Wisconsin Brownfields Coalition's (WBC) 2009 applications to the Environmental Protection Agency for a federal brownfields assessment coalition grant. The Southeastern Wisconsin Regional Planning Commission, representing Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha Counties is formally agreeing to continue as a member of the Wisconsin Brownfields Coalition, with the Wisconsin Department of Natural Resources as the grant administrator, for the purpose of applying for \$1 million in U.S. Environmental Protection Agency Brownfields Assessment Grant Funds to expand the services that the Wisconsin Brownfields Coalition provides to local governments.

The estimated 8,000 brownfields are a significant obstacle in regaining Wisconsin's environmental and economic health. The WBC's grant would be used to assess environmental contamination in areas where pollutants have been identified as a problem. After assessment, brownfields can be cleaned up and redeveloped so that growth may occur as redevelopment within existing communities served by existing infrastructure. In southeastern Wisconsin, these Federal funds have been of significant benefit to all communities, small and large.

The brownfields grant application by the Wisconsin Brownfields Coalition is a good fit with our regional planning goals for several reasons:

- It supports sound land use management.
- It helps local governments take advantage of existing infrastructure.
- It promotes economic development in urban and rural communities.
- It helps protect citizens from environmental pollutants.

If you have any questions, please feel free to contact me at (262) 547-6721.

Sincerely,

Kenneth R. Yunker, P.E.
Executive Director

KRY/MGH/pk
#147024 V1 - WDNR BROWNFIELDS COALITION LOS

cc: Ms. Darsi Foss, WDNR-Madison (RR/5)

bcc: Elizabeth A. Larsen



West Central Wisconsin Regional Planning Commission

October 5, 2009

Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources
101 South Webster Street (RR/8), PO Box 7921
Madison, WI 53707-7921

SUBJECT: Support for the Wisconsin Brownfields Coalition's Applications for \$1 Million in Brownfields Assessment Funds.

Dear Secretary Frank:

We are writing in support of the Wisconsin Brownfields Coalition's (WBC) application to the Environmental Protection Agency for a federal brownfields assessment coalition grant. The West Central Wisconsin Regional Planning Commission, representing the Counties of Barron, Chippewa, Clark, Dunn, Eau Claire, Polk and St. Croix, is formally agreeing to continue as a member of the Wisconsin Brownfields Coalition, with the Wisconsin Department of Natural Resources as the grant administrator, for the purpose of applying for:

- o \$1 M in EPA Brownfields Assessment Grant Funds to expand the services that the WBC provides to local governments to include federal assessment funds.

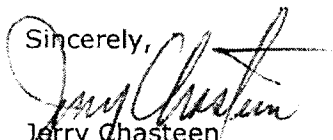
The estimated 8,000 brownfields are a significant obstacle in regaining Wisconsin's environmental and economic health. The WBC's grant would be used to assess and environmental contamination in areas where pollutants have been identified as a problem. After assessment, brownfields can be redeveloped so that growth occurs within "downtown" communities rather than sprawling into green spaces on the edges of towns. In Wisconsin, we have found these federal funds of significant benefit to rural communities and for inner city properties.

The brownfields grant application by the Wisconsin Brownfields Coalition is a good fit with our regional planning goals for several reasons:

- It supports sound land use management.
- It helps local governments take advantage of existing infrastructures.
- It promotes economic development in urban and in rural communities.
- It helps protect citizens from environmental pollutants.

If you have any questions, please feel free to contact me at 715-836-2918.

Sincerely,



Jerry Chasteen
Director

cc: Darsi Foss, DNR RR/5

ATTACHMENT C: Support Letters from Partners

The Wisconsin Brownfields Coalition has received support letters from the following four organizations:

- University of Wisconsin- Milwaukee
- 1000 Friends of Wisconsin
- The 30th Street Industrial Corridor Corporation
- The Brownfields Study Group



School of Architecture and Urban Planning
Department of Urban Planning

Christopher De Sousa
Associate Professor
School of Architecture and Urban Planning
University of Wisconsin--Milwaukee
P.O. Box 413
Milwaukee, WI 53201-0413
414 229-4874 *phone*
414 229-3981 *fax*
desousa@uwm.edu

October 14, 2009

Darsi Foss, Chief
Brownfields and Outreach Section
Bureau for Remediation and Redevelopment
Wisconsin Department of Natural Resources
101 South Webster Street, Box 7921 (RR/5)
Madison, WI 53707-7921

RE: Letter for Support for EPA Brownfields Funding

I am writing to strongly support the Wisconsin DNR's efforts to secure additional federal brownfields funds from the US Environmental Protection Agency. Simply put, these funds will help them to continue their excellent efforts to clean up and reuse brownfields throughout the state.

I am a Professor at the University of Wisconsin-Milwaukee and Co-Director of the Brownfields Research Consortium. I also co-direct the Menomonee Valley Benchmarking Initiative, which tracks economic, environmental, and community conditions in Milwaukee's Menomonee Valley, Wisconsin's largest cluster of former brownfields. And, above all, I am a resident of Wisconsin. In all of these roles, I have come to understand the importance of the DNR's efforts to promoting brownfields redevelopment that brings jobs, taxes, and breathes new life into communities affected by brownfields. Needless to say, the need for their leadership has become even more vital as the current economic crisis closes manufacturing plants and adds to foreclosures throughout the state.

I have conducted research on Brownfields Revitalization for over a decade in the US, Canada, and Europe. Through this work I have studied numerous projects and programs at federal, state/provincial, and municipal levels. Wisconsin's program and the DNR are very effective and innovative. Programs such as the Site Assessment Grants have been essential for getting developers to consider brownfields that they wouldn't have otherwise. New programs involving insurance tools, green space, and others have also shown a desire to come up with innovative tools to tackle the brownfields problem and expand the potential end uses for these sites.

Nancy Frank, who is co-signing this letter, is Chair of the Department of Urban Planning. Nancy has served on the Brownfields Study Group and is a member of the plant closing subcommittee. The Bureau

of Remediation and Redevelopment has taken a proactive and thoughtful approach to anticipating the brownfields issues that may arise as factories across Wisconsin close in response to the economic crisis.

What most impresses both of us about the DNR, however, is the fact that they are actively involved in both small- and large-scale projects, in small and large communities. They also work very well with all stakeholders. This ensures that all communities in the state benefit from their involvement and appreciate it immensely.

I would also like to note that I have conducted interviews with numerous stakeholders throughout Wisconsin and have always been told great things about the DNR's program and the individuals at the Madison office. I have simply not seen the same respect and admiration in other states and provinces that I've studied.

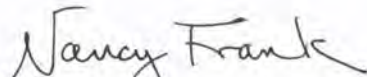
For all of the reasons stated above, we strongly support the Wisconsin DNR's request for additional brownfields funding.

Please contact us if you need additional information.

Kind Regards,



Chris De Sousa, PhD
Associate Professor



Nancy Frank, PhD
Associate Professor and Chair



16 North Carroll Street Suite 810 Madison, WI 53703
friends@1kfriends.org 608.259.1000 www.1kfriends.org

October 13, 2009

Matthew J Frank, Secretary
Wisconsin Department of Natural Resources
101 South Webster Street
Madison, WI 53707

RE: Letter of Support for EPA Brownfields Funding

Dear Secretary Frank:

On behalf of 1000 Friends of Wisconsin, I am writing in support of the Wisconsin Brownfields Coalition's brownfields grant application for \$1 million in EPA assessment funds. It is my understanding that the Wisconsin Department of Natural Resources, as the grant administer, is applying for the EPA funds to assess the large number of manufacturing plants that have closed in Wisconsin over the last decade. WDNR, in partnership with other state agencies and community groups, such as 1000 Friends, hopes to accelerate the number of properties being reused, thus protecting Wisconsin's precious farmland and green space areas.

1000 Friends of Wisconsin was created to protect and enhance Wisconsin's urban and rural landscapes by providing citizens with the inspiration, information and tools they need to effectively participate in the decisions that have the greatest impact on community health. We accomplish our work through three major efforts:

- (1) Promoting Implementation of Smart Growth
- (2) Policy Development and Advocacy
- (3) Research and Information Sharing

Our work focuses on helping communities make the connection between our everyday land use and transportation decisions and our state's economic, environmental and cultural health. The clean up and reuse of brownfields properties is fundamental to our mission. The WDNR's effort to undertake a plant recovery initiative to address the hundreds of closed, closing and bankrupt brownfields properties will help promote wiser land use. As a state that is an unfortunate national leader in the amount of farmland and green space that has been lost to development, these funds would assist in making these former brownfields properties useable again. Promoting sustainable communities and infill development is a priority of 1000 Friends and the WDNR's initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Hiniker".

Steve Hiniker
Executive Director

OFFICERS

Sarah Slack,
President
Foley & Lardner LLP
Michael Floyd,
Vice President
Glenn Rieder
David Misky,
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Redevelopment Authority
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EXECUTIVE DIRECTOR

Brenna Holly

October 14, 2009

Secretary Matthew J. Frank
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 7921
Madison, WI 53707-7921

Dear Secretary Frank:

The 30th Street Industrial Corridor Corporation (The Corridor) is pleased to express its support of the Wisconsin Department of Natural Resources' (WDNR) applications for environmental clean up and assessment funds from EPA for the benefit of Wisconsin communities.

The Corridor is a not-for-profit organization that has worked to recruit and retain businesses and jobs on the north side of Milwaukee since 1991. We have witnessed how vacant, blighted and suspected brownfields have negatively impacted redevelopment of the 30th Street Industrial Corridor and surrounding neighborhoods. We currently have two very large brownfield sites in the 30th Street Corridor—Esser Paint and Tower Automotive—that are key to the revitalization of the area. Should the WDNR be awarded funds from EPA, assessment and remediation efforts could be greatly expanded at these two sites which will also us to move forward more quickly with attracting businesses, jobs and redevelopment to the area.

We appreciate the WNDR's leadership in brownfield redevelopment in the 30th Street Industrial Corridor, Milwaukee and throughout Wisconsin. Please contact me at (414) 444-4706 or bholly@thecorridor-mke.org if I may be of further assistance.

Sincerely,



Brenna Holly
Executive Director



THE CORRIDOR

INDUSTRIAL ROOTS – PROGRESSIVE FUTURE



THE BROWNFIELDS STUDY

GROUP 2008

Members

John Antaramian
Nancy Frank
Arthur Harrington
Steve Hiniker
Bruce A. Keyes
Larry Kirch
Scott Manley
Peter McAvoy
Dave Misky
Tom Mueller
Peter Peshek
John Stibal
Joy W. Stieglitz
Mark Thimke
Scott Wilson

October 15, 2009

Matt Frank
Secretary
Wisconsin Department of Natural Resources
101 S. Webster St. (RR/8) PO Box 7921
Madison, WI 53703

Dear Secretary Frank,

On behalf of Wisconsin's Brownfields Study Group, we are writing in support of the Wisconsin Brownfields Coalition's (WBC) 2009 application to the U.S. Environmental Protection Agency (EPA) for \$1 million in EPA Brownfields Assessment Grant funds to help expand the WBC's efforts to turn contaminated properties into vital community assets.

Brownfields remain a significant hurdle to revitalizing Wisconsin's environmental and economic health. Recent plant closings across the state have only added to the challenges facing communities looking to investigate, clean up and redevelop these abandoned, idle or underused properties. The WBC's grants would help assess environmental contamination in these key areas as well as in other communities where brownfields present a significant problem. The assessments will then help jump start cleanups at these sites, which can then be redeveloped and spur additional neighborhood growth within "downtown" communities, rather than sprawling into green spaces on the edges of towns.

We support the assessment application because the funding:

- supports sound land use management;
- would be used to encourage the assessment, cleanup and redevelopment of properties where industrial and/or commercial facilities are closing;
- helps local governments take advantage of existing infrastructures;
- helps protect citizens from environmental pollutants; and
- helps urban centers market themselves as healthy and productive places to work and live.

Possible brownfield projects that could use federal assessment funds include:

- sites that need additional assessment work in order to be eligible for state or federal cleanup grants, including DNR Brownfields Ready For Reuse Loan and Grant funds, Department of Commerce Brownfield Grants and Department of Administration Coastal Management Grants; and
- sites located in communities with high unemployment and poverty, such as federal enterprise communities, renewal communities, or state community development and enterprise zones.

The Wisconsin Brownfields program has been recognized as a leader in innovation, in part because of the diverse availability of funding. We believe that assessment funds administered by the WBC would provide a remarkable return on investment in terms of the impact on contaminated properties in Wisconsin, and fill an urgent need essential to fuel the economic engine of growth.

On behalf of the Brownfield Study Group and in particular, the private sector and local government members of the Group, we urge the award of funds to the Wisconsin Brownfield Coalition.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Keyes". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Bruce A. Keyes
On Behalf of the Wisconsin Brownfields Study Group

cc: Brownfields Study Group Members
Darsi Foss, DNR
Melissa Enoch, DNR