

## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Matthew J. Frank, Secretary

101 S. Webster St.  
Box 7921  
Madison, Wisconsin 53707-7921  
Telephone 608-266-2621  
FAX 608-267-3579  
TTY Access via relay - 711

October 15, 2010

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 - \$900,000 in hazardous substance and \$100,000 in petroleum funds. The WBC members include the Wisconsin Department of Natural Resources, and the following three Wisconsin Regional Planning Commissions (RPCs): Northwest Wisconsin RPC, West Central Wisconsin RPC, and Southeastern Wisconsin RPC.

These governmental entities have 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 of 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. Applicant DUNS number:**

809611247

**c. Funding Requested:**

i) Assessment

ii) \$1,000,000

iii) Contamination: \$900,000 hazardous substances and \$100,000 petroleum

iv) Coalition

**d. Location:** State of Wisconsin

**e. N/A** (site-specific property information)

**f. 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.

**g. Date Submitted:**

October 15, 2010 through [www.grants.gov](http://www.grants.gov).

**h. Project Period:**

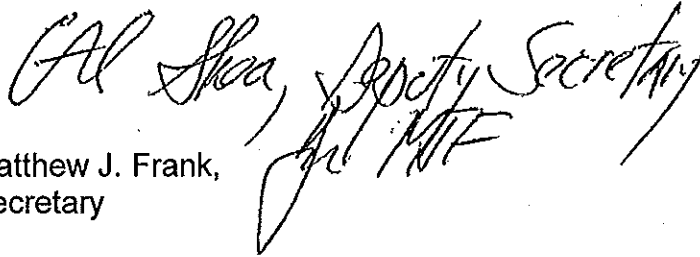
From October 2011 through September 2014.

**i. 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,

A handwritten signature in black ink that reads "Al Shea, Deputy Secretary" with "Al MTF" written below it.

Matthew J. Frank,  
Secretary

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

### III.C. THRESHOLD CRITERIA

#### III.C.1. Applicant Eligibility

The Wisconsin Brownfields Coalition (WBC) is the applicant for this \$1 million coalition assessment grant: \$900,000 in hazardous substance and \$100,000 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 is in Attachment A. Letters documenting membership in the WBC are in Attachment B.

#### III.C.2. Letter from State or Tribal Environmental Authority

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

#### III.C.3. Site Eligibility and Property Ownership Eligibility

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

### V.B. RANKING CRITERIA

#### V.B.1. Community Need

**V.B.1.a. Health, Welfare and Environment.** Wisconsin communities have a demonstrated need for funds to assess and investigate approximately 4,271 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. The size of the sites vary from less than one acre dry cleaners and gas stations to large brownfields sites, such as the former Chrysler-Kenosha Engine Plant (107 acres) and the Oak Creek Lake Michigan brownfields project (300 acres). 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. For communities that are land-locked (i.e., no unused, vacant lands), these former historic landfill sites are prime redevelopment properties. The focus of the WBC's initiative is to provide statewide funding for communities struggling with the public health, economic and environmental impacts from the rash of closed manufacturing plants in the last 10 years. The Coalition does not have pre-selected communities or sites at this time. For illustration purposes only, the Coalition will represent the "community need" for both the state as a whole and the following representative communities: (1) Rock County, including the cities of Janesville and Beloit; (2) City of Kenosha; (3) City of Milwaukee; (4) Village of Osceola; and (5) the City of Racine (US Census Bureau Statistics).

Concentration of Brownfields: State and Select Communities			
Jurisdiction	Population	Open Sites	Populace per Site
Wisconsin	5, 654,571	4,271	1,324 people per site
Rock County	160,155	58	2,761 people per site
Kenosha	98,187	90	1,091 people per site
Milwaukee	605,013	677	894 people per site
Osceola	2, 687	10	269 people per site
Racine	82,009	79	1,038 people per site

Wisconsin has a plethora of known contaminated sites across the state. As illustrated in the table above, for every brownfield site there are on average 1,324 people in the state. Of the communities illustrated in the table above, all had more brownfields per capita than the state average, except Rock County. However, Rock County would be considered a “rural” community by definition. It is the home of the City of Janesville, which had one of the oldest, continuously operating GM plant close down in the last 2 years; 170 acres in downtown Janesville. The plant closing also impacted neighboring communities, such as Beloit, the people formerly employed at the Janesville plant and supplier industries that consequently shut down. The WDNR estimates that there are many “undiscovered” brownfields sites due to GM and its supplier businesses ceasing operation. A new generation of brownfields will likely be discovered in the next 5 years due to these businesses closing and likely becoming tax delinquent.

The City of Kenosha is responding to the closure of the Chrysler Engine Plant, which presently encompasses over 100 acres. Further, the WDNR is aware of three former Chrysler properties in Kenosha that need assessment and cleanup. This grouping of adjacent Chrysler properties has over 2,400 single family homes and eight schools located within a half mile of them.

In Milwaukee, there are over 650 known contaminated properties that need investigation and/or cleanup. Many of these properties pose the greatest challenges to the state, due to size, proximity to residences and type of contamination. For example, the Milwaukee Die Cast site, in the heart of northern Milwaukee, remains abandoned by the former owners. The Milwaukee Metropolitan Sewerage District (MMSD) has spent over \$4M responding to PCB contamination at the site, by sealing storm sewers at the site, and cleaning up MMSD sludge waste. The site requires further investigation and cleanup.

The City of Racine has two contaminated properties – the Walker Forge and Racine Steel Casting sites - that constitute over 20 prime acres of property in downtown Racine. The casting site is on Lake Michigan, and until 2008 it was to be the anchor for economic redevelopment near the downtown. The property remains an unused brownfield due mostly to the subprime housing market collapse in 2008.

<b>Health and Welfare of Select Wisconsin Communities: #1 (best) - #72 (lowest)</b>				
<b>Location</b>	<b>Health Behaviors</b>	<b>Physical Environment Rank</b>	<b>Mortality &amp; Morbidity</b>	<b>Obesity</b>
Rock County	#65	#62	#62	32%
Kenosha County	#59	#42	#60	32%
Milwaukee County	#72	#72	#71	27%
Polk County	#11	#33	#26	42%
Racine County	#63	#61	#61	28%

As noted in the table above, these communities also struggle with health and welfare issues. The source of all but the obesity data in the table is from the 2010 Mobilizing Action Towards

Community Health report by the University of Wisconsin Population Health Institute. County health data was collected and evaluated for all 72 Wisconsin counties, including (1) mortality/morbidity (quality and length of life); (2) health behaviors (alcohol use; exercise, etc); and (3) physical environment (environmental quality and built environment). They ranked each of the 72 Wisconsin counties on a scale of 1 (best) to worst (72) regarding these health indicators. This research illustrates that the cities/counties of Racine, Kenosha, and Milwaukee, along with Rock County, have significant public health and environmental health issues when compared to other Wisconsin communities. In many instances, these communities are consistently near the bottom of the rankings regarding quality of life, mortality, lead contamination and asthma hospitalizations.

These communities also struggle with higher than average rates of cancer (with the exception of Polk County/Osceola). The national cancer rate and Wisconsin's cancer rate are 464 and 469 incidents per 100,000. The selected counties all have cancer incident rates above the state and national averages: Racine (499); Milwaukee (491); Rock (491); and Kenosha (483). Between 1995 and 2004, cancer rates for whites decreased, but rates for African Americans increased (Wis. DHS Data). The largest population of African Americans resides in the City of Milwaukee; home to one of the highest concentration of brownfields sites and two Great Lakes Areas of Contamination: Menomonee River and the Milwaukee Estuary. In addition, these communities rank high in hospital-related asthma visits: Milwaukee (#2); Kenosha (#4) and Racine (#6),

Wisconsin's struggles with obesity are consistent with the national average of 34%. However, this general data does not clearly illustrate the impact of obesity on sensitive populations – both adult and children – in Wisconsin. According to a 2010 report by the National Council of La Raza and Population Reference Bureau, 57% of Latino youth in Wisconsin are overweight or obese. According to a report by the Trust for America's Health, Wisconsin ranks 24<sup>th</sup> for adult obesity. However, one out of every two African-Americans in Wisconsin is obese, the highest rank for any state. Further, in Polk County, a rural area, the obesity rate is 42%. These statistics reflect the absence of a healthy environment and healthy quality of life options, including lack of high quality local food and safe places to play and recreate.

With respect to other environmental impacts to sensitive populations, several of these communities have a significant percent of children with childhood lead poisoning levels; which is 10 micrograms or higher; as established by the Center for Disease Control (CDC). In 2008, several communities had significantly high rates of lead poisoning levels in children tested; highest rates were in Milwaukee at 6.1% and Racine at 3.1% (2008 State Department of Health Services Report: "The Legacy of Lead."). However, in the 30<sup>th</sup> Street Corridor section of Milwaukee, approximately 15.7% of the children tested had blood lead levels exceeding the CDC standards. This neighborhood is 95% minority and has an estimated 200 brownfields sites in the area, including the former Tower Automotive site (60 acres), Esser Paint Factory (Superfund removal action site), which are located adjacent to residential properties.

**V.B.1.b. Financial Need.** While often seen as the "dairy state," Wisconsin has a strong history of both heavy and light manufacturing as a major part of its economy. Wisconsin has the highest percentage of its job base employed in manufacturing, sharing that honor with the state of

Indiana (US Bureau of Labor Statistics). Like other states, Wisconsin has lost a record number of manufacturing plants in urban and rural parts of the state, due to the recession. Since 2000, Wisconsin has lost 25 % of its manufacturing base and a total of 170,000 manufacturing jobs. With this historic job loss, a startling 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.

According to the Center on Wisconsin Strategy (COWS) 2010 Wisconsin Job Watch Report (August 2010):

- Wisconsin has 155,000 fewer jobs than it did in December 2007.
- Underemployment in the state is 15%.
- Nearly one in four African American workers are underemployed.
- Hispanic workers had a 16% unemployment rate and a 25% underemployment rate.
- Nearly one in three black women and one in four white women work in poverty-wage jobs. This statistic is compounded by the fact that more women in Wisconsin work outside the home (67%) than the national average (59%).
- COWS concluded that Wisconsin’s Job Outlook continues a pattern of “almost zero job growth.”
- Since December 2007, the state lost almost 69,000 manufacturing jobs or about 14% of its base.
- It will take until February of 2012 to return to 2007 employment levels.

This data is supported by the findings of the Center for Economic Development’s 2009-2010 Assets and Opportunity state scorecard, an annual rating of all states and the District of Columbia. In this year’s findings (“1” is best and “51” is worst), the State of Wisconsin again ranked near the bottom of all states in the following categories: small business ownership rate (51); minority business ownership (50); business creation (49) and employment growth (32). Further, the study concludes that 22.5% of Wisconsinites are “asset” poor compared to the national average of 14%; “asset poor” means they family would have insufficient resources to keep them out of extreme poverty for 3 months in the event of a job loss.

<b>Financial Need: State of Wisconsin and Select Communities</b>				
<b>Location</b>	<b>Unemployment Rate</b>	<b>Poverty Rate- Families with Kids</b>	<b>Food Stamp Recipient:</b>	<b>Social &amp; Economic Factors</b>
Wisconsin	7.9%	16.7%	24% in one yr	
Rock County	10.2%	20.2%	57% in 3 yrs	#62
Kenosha	10.9%	17.9%	64% in 3 yrs	#42
Milwaukee	11.5%	29.9% 59% central city	70% in 3 years	#71
Osceola	8%	9.6% (individuals)	46% in 3 yrs	#33
Racine	14.2%	14.3%		#61

These economic hardships are a daunting challenge for the state of Wisconsin and these selected communities, which have a higher than state average unemployment rate. More challenging is the data for Milwaukee and Rock County concerning childhood poverty. In Wisconsin, 16.7%

of children were living in poverty, most of them in Milwaukee County, where 29.9% were officially poor. In some sections of the central city, the child poverty rate is closer to 59%. Rock County has the second worst rate, 20.2%. (10/2/2010 Wisconsin State Journal) According to the McIver report (10/8/2010), one in eight Wisconsin citizens (13% of the population) is receiving food stamps. This is an increase of 24% in one year (July 2009 to July 2010).

Further, these communities ranked near the bottom in the Wisconsin county health ranking documented in the "Mobilizing Action Toward Community Health" report, in the area of "education employment income and social support/community safety" rankings: Rock County (#62/72); Milwaukee County (#71/72) and Racine County (#61/72). The city of Milwaukee is now considered the fourth poorest city in the nation, up from 11<sup>th</sup> poorest in 2009. (US Bureau of Census/Milwaukee Journal Sentinel, 09/2010) An estimated 158,000 Milwaukee residents are considered poor. Poverty rates increased over the last year in Kenosha (+4.3%), Milwaukee (+3.3%), Racine (+2.3%) and Wisconsin (+2.3%).

Additional factors affecting the state as a whole and these select communities are: (1) bankruptcies; (2) plant closings/mass layoffs; and (3) foreclosures. Consistent with the last 5 years, Wisconsin ranks 6<sup>th</sup> in the nation in mass plant closing/layoff notices nationally (US Bureau of Labor Statistics). In the last 5 years, approximately 500 businesses of 50 or more employees have closed a plant in Wisconsin. Since 2008, Wisconsin has seen a record pace of business-related bankruptcies. The WDNR has been involved in filing 8 bankruptcy and state receivership proof of claims (POCs) in 2009 and 2010; from 2000 to 2008 the WDNR filed a total of 4 POCs. Further, there are record numbers of non-residential foreclosures in the state.

Both the state in general and the selected communities in this grant application no longer have the financial means to draw on discretionary sources of revenue to invest in brownfields assessment and cleanup, as they did prior to the December 2007 (i.e., the start of the recession). In 2009, property tax collection fell 12.4% in Wisconsin, the first decline since 2002 (Wisconsin Taxpayers Alliance). So far in 2010, Milwaukee has acquired 480 properties through tax foreclosures, compared to 398 in 2009 and 184 in 2008. These distressed properties are lowering home values in the city, and the number of foreclosures is predicted to increase. Tourism revenues for local governments have declined; Rock County's tourism revenue declined \$44 million since 2004, and 2009 tourism revenue declined 1.77 % in Kenosha County. Sales tax revenues have declined as well; for example, Rock County has seen a 13% decrease.

The tax base has been further eroded by the fact that the bankruptcy and closure of major manufacturers in the state (e.g., GM, Delphi, Polaris, Tecumseh, and Chrysler) have and will continue to negatively impact the revenues for the state and these communities. For example, the annual property tax revenues for the Chrysler plant in Kenosha were over \$350,000. The economic challenges presented by the current recession have challenged the state and most of its communities with providing basic services to its citizens. Most communities no longer have the financial or staffing capability to address the existing inventory of brownfields, let alone the "new generation" of brownfields created by the current recession in Wisconsin. With the current unemployment, poverty, bankruptcy and foreclosure rates in the state, it will be several years (2012 according to the COWS) until the state recovers to the 2007 level of employment.

All of these factors make it very difficult to draw on other state or local sources of funding for the assessment of brownfields. As an illustration, state entities have over \$504 million in New Market Tax credits that are going unused, as state banks' profitability – and thus need for these tax credits – has decreased significantly since 2007 (Milwaukee Business Journal 09/24/2010). These tax credits are designed to encourage business expansion in distressed areas. According to this news article, “the lack of [available] credits is likely to stall many potential projects in southeastern Wisconsin” (i.e., Milwaukee, Kenosha and Racine).

While the state of Wisconsin received a coalition assessment grant in 2009, it is still in need of further assistance to assess the large number of plants that have closed due to the most recent recession, and even those that were impacted prior to this recession. WDNR has created the Wisconsin Plant Closing Initiative (WPRI) which provides staff assistance and funding to communities to proactively address closing plants. The WDNR, with our partners, has elected to provide the \$1 million in 2009 assessment funds to communities by (1) providing financial awards to communities for large projects, where they competitively hire a consultant; or (2) by WDNR competitively hiring 3 consultants and offering to conduct “target brownfields assessment-type” services, such as Phase I and II environmental assessment. Presently, the WDNR has applications in house for over \$1.4M in funding and services. By mid-November, WDNR will be announcing the award of the community-managed funds (\$500,000) and the award of 4 to 6 targeted assessments to be conducted by WDNR's consultants. This will account for the formal commitment of approximately \$750,000 in funds/services. Based on our outreach efforts, we expect 10 more TBA-type projects to be submitted by April 2011, and all funds to be encumbered by that timeframe.

## **V.B.2. Project Description and Feasibility of Success**

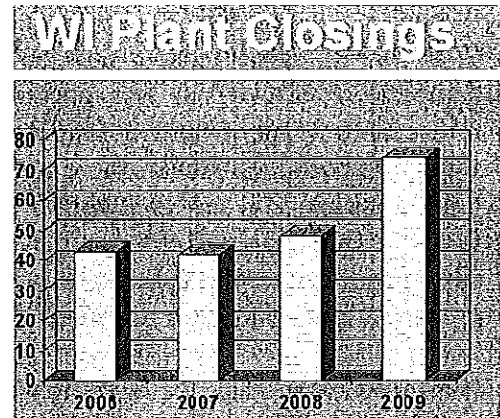
**V.B.2.a. Project Description – Wisconsin Plant Recovery Initiative** The WBC is seeking \$1 million for a coalition assessment grant - \$900,000 in hazardous substance funds and \$100,000 in petroleum funds - to target manufacturing plant closings and bankruptcies that have occurred since 2000. According to state records, since 2000, over 800 businesses have notified the state of a plant closing. The WDNR and its sister agencies are partnering in this 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 that accelerates an economic recovery that would otherwise take decades to achieve. The WDNR and partners – state agencies, RPCs, and the Brownfields Study Group – elected to apply its 2009 EPA brownfields assessment grant award of \$1 million to the bolster the plant recovery initiative.

WPRI entails a coordinated, proactive approach to addressing what the WDNR believes is a “new generation” of brownfield sites. Given that Wisconsin shares the title of the number one state in manufacturing employment (US Bureau of Labor Statistics) and was 6<sup>th</sup> highest state in plant closings (US Bureau of Labor), logically there are a large number of closed facilities where there is known or perceived environmental contamination. The WDNR is hoping to successfully



acquire another \$1 million assessment coalition grant in order to continue to offer funding to assess these properties and expeditiously move these closed plants back into productive use. The WDNR launched this initiative in March of 2010. Already, the program achieved national recognition when the Environmental Council of States awarded the WDNR's plant recovery initiative with one of its four "innovative state program's" awards in September 2010.



*Plant closings shot up in Wisconsin, as the economy soured.*

WPRI is simply a process of proactively identifying closed/closing/bankrupt plants and offer 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 or the WDNR discovers it by other means, 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, cleanup, wastewater and water supply data bases to determine if WDNR has a regulatory interest in the plant
- (4) triage screening check list is filled out by WDNR to determine any health/emergency concerns and confirm regulatory status;
- (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;
- (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 is offering state and federal financial incentives to communities and plant owners in order to accelerate the assessment of known or perceived environmental contamination. This assessment grant would supplement an additional \$1 million in EPA assessment funds into the WPRI program. Of the \$1M in EPA brownfields assessment funds awarded to the WBC in 2009, one award has been made, and 11 applications requesting more than \$1.4M have been reviewed and are ready to be awarded by the end of November 2010. Approximately half the funds will be awarded to communities for "large" brownfields projects, while the other half of the 2009 funds will be offered as WDNR-managed contractor services. Our first contractor services award is to the Shurpac (former Walker Forge) site in inner city Racine. The WDNR's contractor is performing a Phase I and II environmental assessment to assist a local manufacturer secure bank financing, in order to expand manufacturing operations at this formerly closed plant.

With WPRI infrastructure now in place (March 2010) and consultants selected through a competitive process in late spring 2010, the WDNR can continue the program into the foreseeable future, if further funding can be obtained. These funds and services are offered on a statewide basis. However, there are a number of communities, such as the ones profiled in this grant application – see table above- that could benefit from the award of funds or services. 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.

If awarded this grant, the WDNR would ensure that a minimum of 5 sites would be selected for assessment. The goal would be to deal with immediate public health issues, to protect the environment and to spur economic recovery for these communities. The WDNR requires that the community provide a municipal resolution from the common council to ensure that the request for funds is approved by the governing body, and thus consistent with the long-term comprehensive plan for the local government. Additional points are provided if the community explains the relation of the project to the comprehensive plan or specific redevelopment plan, as well as if the community demonstrates the means to move the project to the next step financially.

Over the last 5 years, approximately 500 businesses have notified the state that they planned to close or have closed, including at least 200 this year alone (Wisconsin Department of Workforce Development). 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 sometimes 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. Local fire departments, the assessors' offices, public health staff, workforce agencies and departments, hazardous waste and cleanup staff and federal EPA staff are overwhelmed.

Wisconsin faces a unique challenge because many of these manufacturing plants are located in urban and 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).

Some of the significant recent plant closings in Wisconsin include:

Community	Sample of Manufacturing Plant Closures: 2005-2010	Number of Workers Affected
Kenosha	Permacel	100
	Chrysler Engine Plant	575
	Con Semler	120
	ITT Pure Flow	113
	Powerbrace	130
Rock County	General Motors	1250
	ATK	200
	Bourns	140
	Thyssen Krup	160

Community	Sample of Manufacturing Plant Closures: 2005-2010	Number of Workers Affected
	Alcoa	300
	Allied Signal	100
	Stanford Pens	140
Racine	Gyrus	170
	PDI	60
Osceola	Polaris	500
Milwaukee	Milwaukee Forge	107
	Unilever	115
	Tower Automotive	120
	Tyco	100

These select communities illustrate a very real, statewide challenge to the recovery of Wisconsin's economy; how to address these former industrial properties when local financial and staffing resources are at a historic low. For example, ATV and snowmobile maker Polaris has notified the state that it anticipates closing its plant in Osceola in spring of 2011. The 500 jobs at the facility are equivalent to 20% of the Village's population. With the loss of the jobs, will come a loss of property tax revenue, support for local business (e.g., restaurants, gas stations, grocery stores), and potentially a need for families to relocate to find other employment. This has become all too common in communities like Janesville, Milwaukee, Kenosha, Racine and Beloit, where major employers have left and the repercussions to the local economy are an order of magnitude larger.

#### **V.B.2.b Budget and Leveraging**

The WBC's plan is to spend the \$1,000,000 in assessment funds on contractual services through the following four tasks:

**Task 1–Phase I Environmental Site Assessments:** Phase I Environmental Site Assessments (ESAs) will be performed to determine to identify potential or known areas of environmental contamination. The Phase I ESAs will be performed in accordance with the “Standard Practice for ESAs: Phase I ESA Process,” established by ASTM, designated E-1527-05 that embodies the All Appropriate Inquiry (AAI) Final Rule (40 CFR Part 312). The WBC anticipates completing 40 Phase I ESAs at an average cost of \$3,000 each.

**Task 2– Phase II Environmental Site Assessments:** Phase II ESAs will be conducted to physically confirm that contamination exists in specific areas of identified in the Phase I environmental assessment. The WBC anticipates completing 21 Phase II ESAs at an average cost of \$20,000 each.

**Task 3– Site Investigations:** An estimated 7 site investigations, at an average cost of \$60,000 - will be conducted to define the nature, degree and extent of contamination, and to determine whether any interim actions, remedial actions, or both are necessary at the site.

**Task 4 – Remedial Action Plans:** An estimated 8 Remedial Action Plans, at an average cost of \$5,000 each, will be developed to evaluate the legally acceptable and protective remedies at the sites.

**Budget: \$900,000 in Hazardous Substances Funds; \$100,000 in Petroleum Funds**

Budget Categories	Project Tasks				
	Task 1 Phase I ESAs	Task 2 Phase II ESAs	Task 3 Site Investigations	Task 4 Remedial Action Plans	Total
<i>Hazardous Substance Funds</i>					
Personnel					
Fringe Benefits					
Travel					
Equipment					
Supplies					
Contractual	105,000	400,000	360,000	35,000	900,000
Other					
Total	105,000	400,000	360,000	35,000	900,000
<i>Petroleum Funds</i>					
Personnel					
Fringe Benefits					
Travel					
Equipment					
Supplies					
Contractual	15,000	20,000	60,000	5,000	100,000
Other					
Total	15,000	20,000	60,000	5,000	100,000
Total	120,000	420,000	420,000	40,000	1,000,000

**Leveraging:** 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) meet with interested communities about challenging properties or projects. State staff work 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 in spring 2011.) 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 cleanup dollars to eligible projects. The state's petroleum cleanup 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 (WCDLF), 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. Seven Ready for Reuse projects have received state brownfields grants totaling \$2,488,000 from the Wisconsin Dept. of Commerce. Ten Ready for Reuse Projects have received \$568,927 in grants from the WDNR Site Assessment Grant Program, and one project received a WDNR Green Space & Public Facilities grant for \$50,000.

#### **V.B.2.c Programmatic Capability and Past Performance**

**V.B.2.c.i. Programmatic Capability** This EPA grant will be managed by the WDNR's Remediation and Redevelopment (RR) Program within WDNR to ensure it complies with prudent fiscal practices. Funds and services will be awarded and tracked by staff that has over 16 years of experience managing financial 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 11 years experience administering brownfields funds to local governments. Shelley Fox, the RR Program's brownfields grant manager, has 12 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, and 18 months managing federal brownfields

funds including ARRA funds. 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. Of the \$1M in EPA brownfields assessment funds awarded to the WBC in 2009, approximately half the funds will be awarded to communities for "large" brownfields projects, while the other half of the 2009 funds will be offered as WDNR-managed contractor services. The WDNR has selected 3 consultants through a competitive process in late Spring 2010; 40 consultant qualification submittals were received, evaluated and reviewed by the WDNR for final selection. The WDNR has the WPRI program infrastructure now in place (March 2010) and has selected its consultants to continue the program into the foreseeable future, if further funding can be obtained. The WDNR's RR program has been competitively procuring goods and services and professional services since the late 1980s.

**V.B.2.c.ii. Past Performance** The WDNR has more than 30 years of extensive experience in the management of federal grants, loans and cooperative agreements. 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; CERCLA Section 128(a) State Response Program grant (over \$6M) from September 2003 through the present; EPA Revolving loan grant awarded in 2004, and supplemented in 2007, 2009, and 2010 for over of \$7 million. An additional \$8 million American Recovery and Reinvestment Act (ARRA) brownfields and LUST funds were awarded in 2009; EPA Brownfields Assessment Grants totaling \$1,800,000, in 2005, 2007, and 2009; and EPA LUST, RCRA Hazardous Waste, and other Superfund grants for over a decade.

**Funds Expenditure:** 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 funding has been spent on schedule, with no funds carried over into the next fiscal year. Since 2004, WDNR has received EPA brownfields revolving loan funds for approximately \$7 million. To date, WDNR has contractually obligated or has pending awards that total approximately \$5.1 million; only \$1.5 million in hazardous substance funds and \$378,000 in petroleum 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 \$140,000 remaining of the second \$400,000 cooperative agreement. WDNR anticipates that the \$140,000 in assessment grant funds will be expended by July 2011. With respect to the \$1 million in assessment funds awarded in October 2009, WDNR fully expects to have those 100% of the funds encumbered by Spring 2011.

**Compliance:** 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 in a timely manner 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 \$660,000 of the \$800,000 in EPA assessment funds conducting 51 Phase I assessments, 28 Phase II assessments, 2 NR 716 Site Investigations, 1 multi-site groundwater investigation, and outreach activities (e.g., web site, open house, publications). With the \$7 million in non-ARRA 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. For ARRA revolving loans funds, WDNR has provided 8 subgrants for \$1.5M with the remaining \$500,000 in ARRA funds to be awarded in early November 2010. The WDNR utilizes its s. 128(a) funds to help administer state grant programs. Over a 10-year period, WDNR has: (1) reviewed 868 state assessment grant applications requesting \$35.7M, and awarded 474 grants totaling \$16.5M; 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.

**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 2010) of WDNR for state fiscal years 2008 and 2009 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.

### **V.B.3. Community Engagement and Partnerships**

**V.B.3.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) impacted 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; (10) technical colleges; (11) regional economic boards, such as M7 in southern Wisconsin and Thrive, in Dane and Rock Counties and (12) other partners.

As previously mentioned, WPRI entails a process of proactively identifying closed, closing and bankrupt manufacturing plants and offering coordinated local-state-federal agency assistance.

WDNR has an extensive web site dedicated to the initiative: <http://dnr.wi.gov/org/aw/rr/rbrownfields/wpri.htm>.

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, 30<sup>th</sup> 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. Further, the WDNR plans to work with its newly hired consulting firms to determine if local residents that have graduated from the EPA brownfields assessment training can be hired to assist on WPRI site projects.

#### **V.B.3.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:

- **Regional planning commissions:** Wisconsin's Regional Planning Commissions (RPCs), three of which are official members of the WBC, will assist the Coalition in marketing the WPRI program through their web site and newsletters, and to work as a neutral third party between a closing business and the interested governmental entities (local and state governments) The RPCs often are aware of projects and can work with hesitant businesses or communities to nominate projects, and to assist with any financial management of the award, if needed. They also have local relations associated with economic development entities that the WDNR does not. They can bridge the communication and trust gap that often occurs between a business and a state regulatory agency. Once WPRI funds or services are awarded, the RPCs can assist needy communities on planning for the next stage of the brownfields project, such as grant writing or economic development planning to secure additional funding to finish the investigation and clean up. They can also assist in marketing success stories in their newsletter, conferences and on their web site. This year alone, we have held nine meetings with Wisconsin regional planning commissions across the state.
- **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. 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.

- **Other agencies:** The WBC will work with other state agencies, such as Workforce Development, WHEDA, Administration, Commerce and Transportation. One of the key tools the WDNR employs are "green team" meetings. 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.

**V.B.3.c. Key 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), a 12-year old state advisory group, will continue to help develop the program and target specific communities. 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 30<sup>th</sup> 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.
- 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.
- 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.

#### **V.B.4 Project Benefits**

**V.B.4.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 474 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, Kenosha, 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, blood lead data collected by the state health officials show that neighborhoods along the 30th Street Corridor have the state's highest concentration of lead-poisoned children. Residents of these urban neighborhoods also have elevated rates of hospital visits to treat asthma. Further, the obesity and diabetes rates in the urban, central cities compound the existing environmental health issues. By assessing, cleaning up and redeveloping these sites, we can provide safer work, living and recreational environments, as well as attracting needed businesses, such as full service grocery stores.

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). 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. For example, state and local health officials are part of the assistance team at sites like the Chrysler engine plant in Kenosha, as well as other brownfields sites.

#### **V.B.4.b. Economic Benefits and Greenspace**

**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 over 400 applications for \$175M in requests. Commerce has awarded 191 grants, for a total of \$75M. The matching investment was \$570M, with a projected increase in property

values of \$1.9B. For every Commerce \$1, there was \$9 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 \$16.5 million for almost 474 projects. However, the WDNR has received requests for more than \$35.7 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.

**Other non-economic benefits** 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 434 sites given final cleanup approval was approximately 4.2 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 168 acres of preserved green space (40 projects x 4.2 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.

#### **V.B.4.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.

#### **V.B.4.d. 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;"><b>ATTACHMENT A: Documentation of Applicant Eligibility</b> <b>Wisconsin's Regional Planning Commissions</b></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**

Jay B. Tappen, Executive 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*

Received Times Jan. 10. 12:59 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  
heretofore 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.



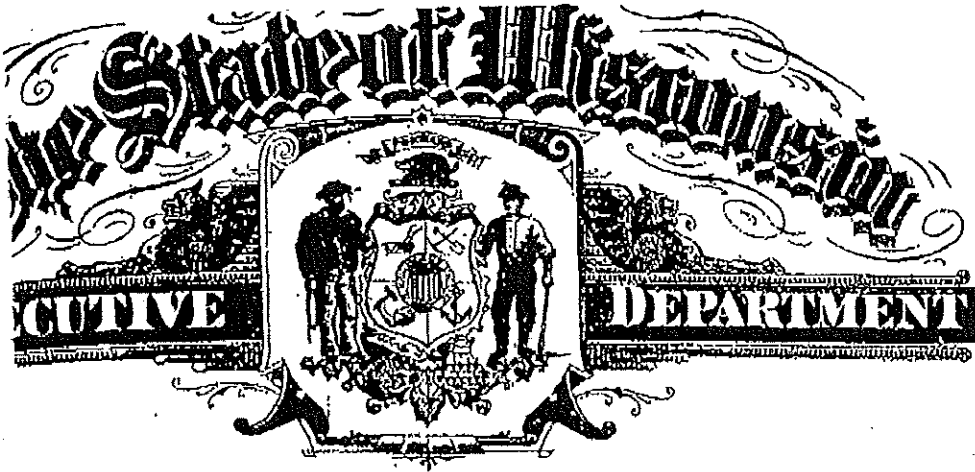
*Lemon W. Johnson*  
GOVERNOR

*William W. 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.

ROBERT A. NELSON  
GOVERNOR

By the Governor:


ROBERT C. ZIMMERMAN  
Secretary of State

Received Time Jan. 12. 12:02PM



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 7<sup>th</sup> day of March in the year of our Lord one thousand nine hundred and seventy-one.



*[Handwritten signature]*



*Patrick J. Lucey*  
PATRICK J. LUCEY  
GOVERNOR

[2]

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*  
Matthew J. Frank, Secretary

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

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

October 7, 2010

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) 2011 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,

Myron Schuster, Executive Director

cc: Darsi Foss, DNR RR/5

# SOUTHEASTERN WISCONSIN REGIONAL PLANNING COMMISSION

W239 N1812 ROCKWOOD DRIVE • PO BOX 1607 • WAUKESHA, WI 53187-1607 • TELEPHONE (262) 547-6721  
FAX (262) 547-1103

October 14, 2010

Serving the Counties of:

KENOSHA  
MILWAUKEE  
OZAUKEE  
RACINE  
WALWORTH  
WASHINGTON  
WAUKESHA



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) 2010 applications to the U.S. Environmental Protection Agency for a brownfields coalition assessment 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 (\$900,000 in hazardous substance funds and \$100,000 in petroleum funds) to expand the services that the WBC 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  
#153965 V1 - WDNR BROWNFIELDS COALITION LOS - 2010-2010

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



**West Central Wisconsin  
Regional Planning Commission**

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

Date: October 7, 2010

**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) 2011 applications to the Environmental Protection Agency for a federal brownfields assessment coalition grant. The West Central Wisconsin Regional Planning Commission, representing Barron, Chippewa, Clark, Dunn, Eau Claire, Polk and St. Croix 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:

- 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,

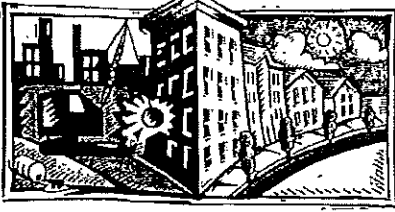
Jay B. Tappan  
Executive Director

cc: Darsi Foss, DNR.RR/5

## ATTACHMENT C: Support Letters from Partners

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

- The Brownfields Study Group
- The 30<sup>th</sup> Street Industrial Corridor Corporation
- 1000 Friends of Wisconsin
- University of Wisconsin- Milwaukee
- Center on Wisconsin Strategies



# THE BROWNFIELDS STUDY

## GROUP 2010

### Members

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

October 11, 2010

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) 2010 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

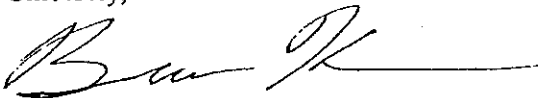


enterprise communities, renewal communities, or state community development and enterprise zones.

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 cursive script, appearing to read "Bruce A. Keyes", followed by a horizontal line extending to the right.

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

Encl: 2009 Brownfields Study Group membership

**OFFICERS**

**Sarah Slack,**  
President  
Foley & Lardner LLP  
**Michael Floyd,**  
Vice President  
Glenn Rieder, Inc.  
**David Misky,**  
Secretary  
Redevelopment Authority  
City of Milwaukee  
**Linda A. Swift, CPA**  
Treasurer  
United Tax Service  
**Tim Casey,**  
Past President  
Equity Commercial Real Estate

**BOARD OF DIRECTORS**

**Ruben L. Anthony Jr.**  
Wisconsin Department of  
Transportation  
**Kim S. Ban**  
DRS Power & Control  
Technologies, Inc.  
**Robert Dennik**  
VJS Construction Services, Inc.  
**Paul Fehrenbach**  
M&I Community Development  
Corporation  
**John Koleas**  
Harley-Davidson Motor Company  
**Ted Matkom**  
Gorman & Company, Inc.  
**Todd Park**  
Eaton Corporation  
**Gary Wenzel**  
Capitol Stampings

**EXECUTIVE DIRECTOR**

**Brenna Holly**

October 4, 2010

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

Dear Secretary Frank:

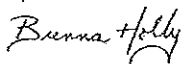
The 30th Street Industrial Corridor Corporation (The Corridor) is pleased to provide this letter support for the Wisconsin Department of Natural Resources' (WDNR) applications for environmental clean up and assessment funds from EPA for the benefit of Wisconsin communities.

The Corridor is a non-profit organization that works to retain and attract businesses and jobs to the 30th Street Industrial Corridor. The 30th Street Industrial Corridor, in the center of Wisconsin's largest city, was at one time Milwaukee's economic engine, supporting tens of thousands of manufacturing jobs for local and area families. However, in the latter half of the 20th century, as companies went bankrupt or moved outside the city, hundreds of acres of land were left vacant and contaminated, while the dense neighborhoods that grew up around the Corridor lost thousands of jobs, becoming some of the lowest-income neighborhoods in the state.

As we work to revitalize this area and attract businesses and jobs to the 30th Street Industrial Corridor, the WDNR, the City of Milwaukee and many non-profit organizations have worked with us to achieve our goals. The Corridor and the WDNR have partnered on a number of initiatives to assess brownfields in the 30<sup>th</sup> Street Industrial Corridor with the ultimate goal of turning these properties into job generators and community assets.

We are grateful for the WNDR's leadership in brownfield redevelopment in the 30th Street Industrial Corridor, Milwaukee and throughout Wisconsin and for the successes they have helped us achieve to date. Please contact me at (414) 444-4706 or [bholly@thecorridor-mke.org](mailto:bholly@thecorridor-mke.org) if I may be of further assistance.

Sincerely,



Brenna Holly  
Executive Director





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

October 4, 2010

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 administrator, 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,

Steve Hiniker  
Executive Director



School of Architecture  
& Urban Planning

October 4, 2010

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

P.O. Box 413  
Milwaukee, WI  
63201-0113  
414 229-4014 phone  
414 229-6976 fax  
[www.uwm.edu/SARUP](http://www.uwm.edu/SARUP)

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 increases 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 also in 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.

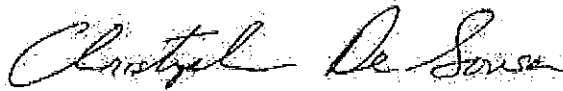
What most impresses both of us about the DNR, however, is the fact that they are actively involved in both small- and large-scale projects, in small and large communities. They also work very well with all stakeholders. This ensures that all communities in the state benefit from their involvement and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

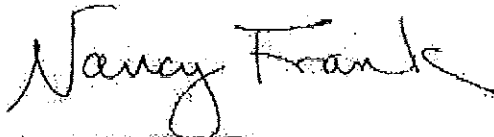
For all of the reasons stated above, we strongly support the Wisconsin DNR's request for additional brownfields funding.

Please contact us if you need additional information.

Kind Regards,



Chris De Sousa, PhD  
Associate Professor, Chair



Nancy Frank, PhD  
Associate Professor and Chair

---

# COWS

Center on Wisconsin Strategy

---

October 8, 2010

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 Center on Wisconsin Strategy (COWS) 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.

COWS is a national policy center for high-road—sustainable, equitable, democratic—economic development. From our base the University of Wisconsin-Madison, COWS has spent the last two decades building training partnerships across the country, bringing together workforce, community, labor, government and industry stakeholders in a variety of sectors. We have focused for the last ten years on the new energy economy, and we are a leading advocate of the retrofitting of building stock in Wisconsin, and surveying the manufacturing base of this state.

Manufacturing is very important to the state's economy, and due to the economic downturn we have seen a large increase in the number of manufacturing plants that have closed their doors. Such sites have the potential to be an environmental hazard, and it is very important that these sites be assessed, remediated and returned to productive use.

We appreciate the WDNR's leadership in environmental protection, and see your new proposal as having a strong beneficial effect throughout Wisconsin.

Please contact me at (608) 262-6944 or [ldresser@cows.org](mailto:ldresser@cows.org) if I may be of further assistance.

Sincerely,



Laura Dresser  
Associate Director