

DRAFT FOR PUBLIC COMMENT

DATE

Mr. Matt Didier
77 West Jackson Boulevard
Mail code SB-5J
Chicago, IL 60604

RE: FY 2019 EPA Cleanup Grant Application – East 8th Avenue Redevelopment Area

Dear Mr. Didier:

The City of Oshkosh Redevelopment Authority (RDA) is pleased to submit this proposal requesting an Environmental Protection Agency (EPA) Brownfields Cleanup Grant for the East 8th Avenue block (Site) in the Sawdust Redevelopment District, Oshkosh, Wisconsin. The goal of this proposed cleanup project is to remediate and assist with the redevelopment of the 1 East 8th Avenue property to further support redevelopment of the newly developed Sawdust District. The Sawdust District was recently established through the Image Oshkosh initiative to provide a vision and comprehensive investment strategy to correct blighted and brownfield properties in the Center City of Oshkosh.

Since the late 1800's the Sawdust District, which is a sub-district of the overall Center City South District was a base of industry that supported the City's wood products industry. Throughout the late 1900's and into the 2000's the Central City district of Oshkosh has experienced job loss, declining property values, shrinking populations, concentration of poverty, and blight. In particular, the loss of anchor employers such as Morgan Doors, The Buckstaff Furniture Company, Mile Kimball Company, and The Pioneer Inn and Resort had a profound impact on the area. From 2008 to 2016, Wisconsin WORKnet data showed a job loss rate up to 7,320 jobs in Oshkosh with the Central City having an employment rate of 13% (2018 EPA EJSCREEN).

The Miles Kimball discontinued operations at the Site in early 2000's. Through the early 2000's the Site was used for various light manufacturing and warehousing until no longer feasible in 2010. The City with support from Wisconsin Department of Natural Resource (WDNR), Wisconsin Economic Development Corporation, the Environmental Protection Agency (EPA), and the public has made a significant investment in assessing, removing blighted buildings, and planning for and around the Site. Through EPA Assessment funds and the WDNR the City performed a Phase I Environmental Site Assessment (ESA) and a Phase II ESA as part of its pre-acquisition environmental due diligence. The vacant buildings were razed through the City's Capital Improvement Funds (CIP) and the planning was performed as part of a WEDC Community Development Investment Grant.

The next step is to prepare the site for development in support of the larger Sawdust District Redevelopment Plan. This redevelopment plan includes a stadium (already completed), hotel and resort, office space, parking, residential housing, and open spaces for a Riverwalk. The requested \$500,000 in EPA cleanup funding plus the City's matching dollars from the CIP funds will move that plan into reality.

Narrative Information Sheet

1. Applicant Identification

City of Oshkosh Redevelopment Authority, 215 Church Avenue, Oshkosh, Wisconsin 54901

2. Funding Requested

a. **Grant Type:** Single Site Cleanup

b. **Federal Funds Requested**

i. \$500,000

ii. Cost Share Waiver

The City of Oshkosh RDA will provide a cost share of at least 20% of the total federal cleanup funds awarded. This application is for a \$500,000 Hazardous Substances Cleanup Grant, therefore, if the City is awarded all of the requested grant funds, a contribution of at least \$100,000 toward eligible cleanup activities for the site will be provided. The City of Oshkosh RDA is not requesting a Hardship Waiver of the cost sharing allocation.

c. **Contamination:** Hazardous Substances

3. Location

City of Oshkosh, Wisconsin

City of Oshkosh, 215 Church Avenue, Oshkosh, Wisconsin 54901

Phone: 920.236.5029, Fax: 920.236.5053

4. Property Information

East 8th Avenue Block, 1 East 8th Avenue, Oshkosh, Wisconsin 54902

5. Contacts

Project Director

Darlene Brandt, Grants Coordinator

City of Oshkosh

215 Church Avenue, PO Box 1130

Oshkosh, Wisconsin 54903-1130

Phone: 920.236.5029

Fax: 920.236.5053

Email: dbrandt@ci.oshkosh.wi.us

Chief Executive

H. Allen Davis III, Executive Director RDA/

Community Development Director

215 Church Avenue, PO Box 1130

Oshkosh, Wisconsin 54903-1130

Phone: 920.236.5055

Fax: 920.236.5053

Email: adavis@ci.oshkosh.wi.us

6. Population

66,665

7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site (s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site(s) is adjacent to a body of water (i.e. the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site(s) is in federal designated flood plain.	
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	

8. Letter from the State or Tribal Environmental Authority

A letter from the State of Wisconsin Department of Natural Resources (WDNR), acknowledging that the City of Oshkosh RDA plans to conduct cleanup activities and is planning to apply for federal grant funds is provided as Attachment A to this letter.

Narrative / Ranking Criteria

1. Project Area Description and Plans for Revitalization

a. Target Area and Brownfields

i. Background and Description of Target Area

The City of Oshkosh is in the heart of Wisconsin's Fox River Valley along the Interstate I-41 corridor and within the triangle of Green Bay, Madison, and Milwaukee, of which more than 2 million people live. Some of the community's defining features include its recreationally-rich waterways and water-bodies which includes Lake Winnebago (Wisconsin's largest lake), Lake Butte des Morts, and the Fox River. The Fox River passes through the heart of the City's center, connecting Lake Butte des Morts to Lake Winnebago. Due to its location, the City has a long industrial history dating back to the late 1800's. Much of the early development in the City was centered on the Fox River. In the early to mid-1900's, the lumber industry fueled most of this development. Cut trees were shipped from northern Wisconsin via the Wolf River and Fox River to lumber mills located in the City, and then onto cities across the Midwest. The City of Oshkosh became known as the "Sawdust City." A large industrial base was soon established to support the lumber industry, which included foundries, manufacturing of logging tools, clothing manufacturing, finished wood products, paper industry, and railroad and river boat transportation. Many of the businesses were located in the Center City due to the location of the Fox River, which then split into the north and south districts. The main artery of Center City and both districts is Main Street. The north shore district is the City's commercial downtown area with some industry along the river. The south shore district was primarily heavy industrial.

By the mid to late-1900's, the logging industry came to halt and so did Oshkosh's economy. Many of the businesses that supported the lumber industry slowly went out of business throughout the late 1900's and into the 2000's. Recently, several of these remaining companies from that era have closed down, downsized, or were out sourced to other countries. This includes businesses such as Miles Kimball, Oshkosh B'Gosh Corporation, Buckstaff Furniture, and Morgan Doors. These employers were considered anchors of the Center City. Due to the loss of these businesses the City of Oshkosh's Center City experienced job loss, declining property values, shrinking populations, concentration of poverty, blight, and crumbling infrastructure and buildings, leaving behind many blighted and underutilized industrial properties. This area was also designated by the Department of Housing and Urban Development as Low to Moderate Income (LMI) census tract, with the median household income ranging from little or no income to \$35,424 (EPA EJSCREEN, 2017 Census Data), which is significantly lower than the U.S. median income of \$57,652 (2017 U.S. Census data).

Due to deteriorating conditions in the City's center, both the north and south district areas are increasingly becoming less of a destination to live, work, and play and have become of a place of residents leaving and businesses closing. In an effort to reverse this trend, the City has developed *The City of Oshkosh Central City Investment Strategy* initiative. *The City of Oshkosh Central City Investment Strategy* initiative was jump started with a Wisconsin Economic Development Corporation (WEDC) \$200,000 Community Development Investment Grant. This investment grant led to a public and private planning effort, in which a policy guide and action framework called *Imagine Oshkosh*, was developed. *Imagine Oshkosh* is a long-term vision and comprehensive investment strategy for the entire Central City district directing growth, development, and infrastructure investment for both public and private investment. The East 8th Avenue block is located right in the north center of the Central City target area within a sub-district call Sawdust Redevelopment Area. The redevelopment of the East 8th Block is a key component of the City's Imagine Oshkosh Plan and making the Sawdust District into a vibrant neighborhood with access to jobs, housing and commercial/retail office and open spaces.

ii. Description of the Brownfield Site(s)

The site is generally level and currently vacant. Buildings at the site have been razed; however, the concrete from the demolition of the structures remains stockpiled on the eastern portion of the Site. Adjacent properties currently include mixed industrial, commercial and residential use, and vacant parcels.

A Phase I Environmental Site Assessment (Phase I ESA) was performed by AECOM on East 8th Avenue Block Redevelopment Area, dated October 2009, under a grant from the EPA Brownfields Economic Redevelopment Initiative. According to the Phase I ESA, the parcel had been developed with industrial, manufacturing and commercial facilities since 1890. Specifically, the area of the proposed development was developed in the 1890s with the Seymour Hotel, furniture store, residential buildings and associated sheds and stables. In the mid-1900s, the Site was developed with a filling station, painting facility and equipment warehouse, a paper and napkin factory, rolled paper and paper warehouses, and a junk yard. In the late 1900s, the Site was developed with a printer (Miles Kimball Company), and at the time of the Phase I ESA, the Site contained Advance Military Packaging (manufacturer of various packaging supplies - boxes, cartons, crates, and pallets, dismantling of truck axles and associated parts washing/cleaning, and storage/warehousing). In 2010, the former Miles Kimball Company and Advance Military Packaging vacated the property the City took ownership and razed the structures.

The Phase I ESA reported that a prior environmental assessment (*Phase I Environmental Site Assessment, 1 E 8th Avenue, Oshkosh, Wisconsin*, AECOM [STS Consultants, LTD], May 5, 2005) and investigation (*Soil and Groundwater Quality Assessment Report, Miles Kimball Main and Printing Facilities, Oshkosh, Wisconsin*, GZA GeoEnvironmental, Inc., June 2, 1992) performed at the Site indicated fill soils were known to be present on the subject property from historical property uses, which included cinders, glass, sawdust, and other wood products. In addition, site investigation and remedial activities were performed in the southeast portion of the Site resulting from volatile organic compounds (VOCs) impacts to the soil and groundwater in this area. Following the Phase I, a Phase II Environmental Subsurface Assessment (Phase II ESA) was performed in October 2009. Six soil borings (B-1 through B-6) were advanced in the area of the proposed development in association with the October 2009 Phase II ESA. Three of the soil borings were converted into temporary monitoring wells for groundwater sampling, installed to depths of approximately 8.5 to 11 feet below grade. Locations of the soil borings and monitoring wells are depicted on **Figure 2**.

Results of the soil borings indicate that fill soils apparently extend beneath the entire site and range from about two (B-1) to nine (B-3) feet thick. The fill soils are comprised of sand and gravel, cinders, sawdust, wood chips and traces of silt and clay. Metals, VOCs, and polynuclear aromatic hydrocarbons (PAHs) were detected in samples collected from the fill soils across the site. Benzo(a)pyrene, arsenic and lead concentrations exceeded the State of Wisconsin generic direct contact residual contaminant level (RCL) for a residential/commercial setting (for the upper 4 feet). Arsenic, barium, cadmium, lead, mercury selenium, benzo(a)pyrene, and benzo(b)fluoranthene concentrations in the soil also exceeded the State of Wisconsin generic groundwater pathway RCL in the fill soils.

Potential exposure pathways were evaluated by comparing analytical data collected at the site with Soil Cleanup Standards established under Chapter NR 720, Wisconsin Administration Code. These standards were established for the remediation of soil contamination, which result in restoration of the environment to the extent practicable; minimize harmful effects to the air, lands, and waters of the state; and are protective of public health, safety and welfare, and the environment. Based on soil analytical results from previous subsurface investigations at the site, soil quality represents a risk to human health as a result of direct contact, including ingestion. Because of the elevated metals, VOCs, and PAHs, fill soils at the site should be managed as impacted material during site redevelopment and excess fill soils generated during redevelopment should be managed as solid waste.

Two VOC compounds (Chloroethane and p-Isopropyltoluene) were detected in the groundwater sample collected from the one temporary well (B3, located in the junk yard area); however, these concentrations did not exceed State of Wisconsin groundwater standards. Most VOC concentrations in the groundwater samples were below the laboratory detection limits.

Because the Fox River nearly adjacent to the site and storm water from the site having a direct connection to the river an impact on soil quality or groundwater quality that would cause a violation of a surface water quality standard contained on Chapters NR 102 to 106 was reviewed. The Fox River could be impacted from the Site due to the lack of site storm water controls, site capping, and evaluated metals, VOCs, and PAHs in the soils.

b. Revitalization of the Target Area

i. Redevelopment Strategy and Alignment with Revitalization Plans

The targeted community for this redevelopment project area is not only downtown Oshkosh and nearby residential and non-residential land uses (typically former industrial properties), but also the community as a whole. The Assessment Grants will focus where the majority of Brownfield properties are located in the Center City, which in general includes Census Tract #5 on the north side of the Fox River and Census Tract #12 and #15 on the south side of the Fox River. Currently, this area has a high rental population, lower incomes, health concerns, and suffers from blight, high vacancy, crime, brownfield sites, distressed properties and vacant lots. The former manufacturing operations and mills are located along the river banks, often accompanied by large amounts of fill material that allowed structures to be constructed in the floodplain.

For many years the central city district of Oshkosh was not atypical of many other central cities in the country by experiencing job loss, declining property values, shrinking populations, concentration of poverty, blight, crumbling infrastructure, etc. The central city district increasingly became less of a destination to live, work and play and more of a place of residents leaving and businesses closing. The south shore area of the Fox River was affected particularly hard due to the loss of three anchor businesses of the south shore area and their closings still have a profound impact on the area.

Center City Oshkosh is nearing the completion of a decades long transition away from being a manufacturing center and retail hub towards an economy grounded in industries, professional services, hospitality, boutique shopping, and entertainment, as well as mixed use redevelopment projects. Oshkosh's Center City is in direct competition with other downtowns across the region. The ability of the Center City to compete will depend on providing clean brownfields site for redevelopment projects.

ii. Outcomes and Benefits of Redevelopment Strategy

The Center City District is framed by traditional lower income residential neighborhoods to the west with a variety of commercial sites intermixed throughout the district. While the district is experiencing change, there are environmental issues to address and opportunities for redevelopment, particularly vacant properties and current and former industrial sites. The Imagine Oshkosh Plan was developed as an update to previous planning efforts and now serves as a long term vision and comprehensive investment strategy for the entire Center City, including the Sawdust District.

Hundreds of jobs have been lost in the past ten years in the south shore area. Factory, hospitality and retail businesses have closed leaving existing buildings dilapidated and hazards to the community. The City's main waterfront focal point, the Pioneer Inn, a former resort and banquet facility along the shores of Lake Winnebago, has been closed for about ten years and currently has no plans to reopen. Neighborhoods with lower earnings and greater poverty are less attractive to potential developers as the demographic data might not support private investment. The south shore has been hit hard with economic hardships and the City is committed to reversing that trend with the Imagine Oshkosh Plan being a catalyst to that goal.

Employment growth in the Center City over the past ten years has outpaced the rest of the City, demonstrating the attractiveness of opening or expanding a business within the Center City and Downtown Area.

The City is committed to moving forward with green building and improving energy efficiency building standards with its developments. Future redevelopment projects will need to include some components or a LEED certification.

Developments will also look at creating landscaped buffers along the Fox River to reduce stormwater sheet flow into the Fox River. Assessment grant Remedial Plans can also incorporate engineering controls that limit stormwater runoff from

contacting impacted soils and assist with the design stormwater treatment controls (bio-swales). In addition, parking lots and decorative landscaping berms will be used to provide barriers to the fill soils. In this way, the impacted fill soils will be beneficially reused on site. Building design will also incorporate foundation design that will be used as a cap over the impacted fill soils, which will limit the amount of soils going to a landfill.

The City in conjunction with EPA Region 5 staff completed the first Analysis of Brownfields Cleanup Alternatives in the nation that provides a green cleanup review of remedial options. The City voluntarily incorporated the six core elements of green remediation established by the US EPA in our Cleanup Plan, showing our commitment to sustainable reuse

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

Due to the diversity of benefits associated with implementation of the Imagine Oshkosh Plan -environmental, economic, safety, quality of life, etc. - there are numerous opportunities from state and federal sources, as well as private funds, to leverage additional funds. Obtaining brownfields funding is a critical step toward goal. Assessment funding will allow for the completion of initial steps in this process and include cost coverage for such crucial elements as public outreach, site selection, and site assessments to identify properties that would need to undergo remediation prior to redevelopment.

Oshkosh has a strong track record for leveraging funds for a wide variety of local projects ranging from economic development long term investment plans to critical infrastructure. Since 2010, the City has received over million in grants for which it has invested cash and in-kind services. The City has received in brownfield cleanup/assessment funds from Wisconsin Economic Development Association which in turn leveraged private investment funds on new construction projects.

The City has been similarly successful in receiving \$5 million from Wisconsin Department of Natural Resources for construction of a Riverwalk / pedestrian trail along the Fox River corridor in downtown Oshkosh. The City's matching funds were budgeted yearly in its Capital Improvements Program. The Riverwalk benefits not only the existing businesses along the Fox River corridor, but has increased private dollars in taxable new developments, and unlimited tourism dollars. The City also successfully implemented a \$2 million Department of Commerce Economic Development Assistance grant for installation of necessary infrastructure in the development of an aviation business park adjacent to the local Regional Airport.

ii. Use of Existing Infrastructure

The City's 2005 Comprehensive Plan incorporates "Smart Growth" policies that look within their existing boundaries and utilize land that is already served by city services for development opportunities, as opposed to continuing to annex Greenfield sites for growth on the periphery of the municipality. Also in that Plan, the goal "promote the re-use of land, infrastructure, and buildings" was included to develop programs and incentives that decrease consumption of new land and new materials. For example, on demolition projects, the City has the building(s) evaluated for salvage potential in order to reduce the amount of material going to the landfill (and paying for tipping fees), and to possibly create some income potential from the sale of these materials. The City incorporates mandatory recycling of materials in all demolition contract specifications. However, not all of the buildings are being razed. A majority of the buildings in the Oshkosh Brownfield area were constructed over a hundred years ago and are considered of historic value. Buildings that are historic and structurally sound will be saved and revitalized, reducing waste to the landfill and reducing greenhouse gases.

2. Community Need and Community Engagement

a. Community Need

ii. The Community's Need for Funding

EPA funds will be used to complete site assessments, evaluate exposure routes for contaminants of concern, and prepare remedial action plans for development of the sites. The areas of concern will be assessed via Phase I and Phase II environmental site assessment plans to determine the degree and extent of impacts and their possible threat to human health and the environment. The City can leverage its own resources, such as staff time, to match or encourage additional public and private funding. Additional financing options such as borrowing is not possible due to the fact the City has reached their borrowing cap limit, and would prefer to use City funds and other developer incentives such as creation of Tax Incremental Finance Districts to support and encourage private investment of redevelopment projects. Likely state

funding sources include Wisconsin Economic Development Corporation brownfields funds, Opportunity Zone funds, or affordable housing tax credit program.

ii. Threats to Sensitive Populations

(1). Heath or Welfare of Sensitive Populations

The City of Oshkosh has identified primary health and welfare concerns related to brownfields and sensitive populations (children, elderly, and/or low-income), and the migration of contamination from these brownfields within the City Center area (Target Area). The Center City area has an estimated population of 11,376, about 18% of the City’s total population (EPA Environmental Justice Census Data 2010). Approximately 46% of residents in the Center City area are considered low-income (EPA Environmental Justice Screening Tool), which is much higher than the State average (30%) and Nation average (34%). Children and residents over the age of 65 account for nearly 35% of the population within the Center City area.

(2). Greater than Normal Incidence of Disease and Adverse Health Conditions

The historic and present uses of properties within the Center City area have attributed to cumulative environmental issues, including but not limited to, poly-chlorinated biphenyl (PCB) contaminated waterways, heavy metals in soil and groundwater, and air emissions including VOC gasses from soil and groundwater impacted sites. These issues may be linked to the City of Oshkosh’s higher than (Wisconsin’s) average cancer and respiratory disease risk. Winnebago County is identified on a pollution tracking database (Scorecard.com) as being one of the worst counties for VOC emissions (the air monitoring station for Winnebago County is in Oshkosh). According to Scorecard.org, the pollution information site, the City of Oshkosh ranked in the top 80% of City’s in the United States for the air releases of recognized air carcinogens. The City Center area ranks in the higher percentile (compared to State, EPA Region, and Nation) for particulate matter, ozone, petroleum contaminated soil and groundwater, cancer and respiratory risks, lead paint, and Superfund proximity. The table below highlights the City Center area’s rankings as provided by the EPA Environmental Justice Screening Tool.

Environmental Variables	Percentile in State	Percentile in EPA Region 5
Particulate Matter (PM 2.5 in µg/m ³)	76	68
Ozone (ppb)	76	67
NATA Diesel PM (µg/m ³)	69	64
NATA Air-Toxics Cancer Risk (risk per MM)	76	67
NATA Respiratory Hazard Index	74	66
Lead Paint (% pre-1960’s housing)	52	40
Superfund Proximity (number of sites per distance in kilometers)	70	67

As a result, the Winnebago County Health Department, ranks the City of Oshkosh greater than normal incidences of adverse health conditions which includes, asthma, lead poisoning, and mental health related illnesses. For example lung cancer rates are 62.2 new cases per 100,000 people as compared to the statewide average of 60. Currently, East 8th Avenue Site is uncapped with public exposure to heavy metals and PAHs. Funding from the Cleanup Grant will assist the City with further reducing public exposure to particulates and higher than average cancer risk.

(3). Economically Impoverished/Disproportionately Impacted Populations

Approximately 46% of residents in the City Center area are considered low-income (EPA Environmental Justice Screening Tool), which is much higher than the State average (30%) and Nation average (34%). Additionally, approximately 15% of adult (18 years of age or older) residents within the Center City area do not have a high school diploma. In 2017, the Oshkosh Area School District reported that 171 students were homeless, with only 2 homeless shelters in the entire county. The City of Oshkosh is listed on the United Way ALICE (Asset Limited, Income Constrained, Employed) Project which provides the framework, tools, and understanding of the struggles households who do not earn enough to afford basic necessities. The ALICE Project identified 41% of Winnebago County as ALICE, and 50% of Oshkosh residents as ALICE, which is higher than the overall ALICE Project average 31% over thirteen states. The ALICE project also identified Winnebago County as being one the worst counties in Wisconsin for housing affordability. The vast majority of Oshkosh citizens who fall into the United Way ALICE category live in the Center City. According to the USDA, a Food Desert has been defined as low-income communities without ready access to healthy and affordable food. The United States Department of Agriculture (USDA) has designated this area as a Food Desert (2011 USDA Food Desert Locator) further impacting the Center City populations.

b. Community Engagement

i. Community Involvement

Partner Name	Point of Contact (Name, email & Phone)	Specific Role in the Project
Greater Oshkosh Economic Development Association	Jason White PH: 920-230-3322 Jason.white@greateroshkosh.com	
Oshkosh Chamber of Commerce	Rob Kleman PH: 920-424-1101 x14 rob@oshkoshchamber.com	
Menominee Nation Arena	Greg Pierce PH: 920-230-6850	

ii. Incorporating Community Input

3. Task Descriptions, Cost Estimates, and Measuring Progress

a. Proposed Cleanup Plan

The City will procure the services of a Qualified Environmental Professional (QEP) to oversee the response action at the site. Several potential alternatives were evaluated for addressing the impacted soils at the site through the Analysis of Brownfield Cleanup Alternatives (ABCA) process. From that evaluation, the on-site reuse with a performance barrier and limited off-site landfilling is the preferred remedy for achieving environmental remediation at the East 8th Avenue Block property due to the effectiveness of the protection of human health and the environment, implementation feasibility, potential climate change risks rating, and cost. This alternative consists of removing impacted fill material that is necessary to facility the construction of the parking lot with the storm water storage beneath, and disposing of the material at a licensed solid waste landfill. The soil excavation will 2 feet with approximately 14,000 tons of soil removed for the underground storm water storage/treatment system and performance barrier (parking lot). Once the material is removed a A geomembrane will be placed beneath the storm water reservoir to prevent infiltration into the unexcavated impacted material that may be beneath (and not removed during construction) to reduce impacts to

groundwater quality. Following placement of the membrane the remaining storm water storage and parking lot will be constructed.

QEP will be onsite to observe and identify the excavation areas containing impacted soil requiring management. The required WDNR Soil and Groundwater Management Plan (SGMP) and WDNR Construction on a Historic Fill Site Permit will be completed and approved by the WDNR. QEP will develop technical specifications for remedial efforts and bidding documents to hire a contractor for the soil excavation and landfill disposal. The preparation of Quality Assurance Project Plan (QAPP) and Health and Safety plan (HASP) will be completed.

Following contraction, preparation and submittal of appropriate site closure and construction documentation reports will be submitted to the WDNR.

b. Description of Tasks and Activities

Description of Task Categories

Task 1 Cleanup Planning – A remedial action report and ABCA will be finalized to outline tasks to be conducted for the site cleanup. SGMP and WDNR Construction on a Historic Fill Site Permit will be completed. QEP will develop technical specifications for remedial efforts and bidding documents to hire a contractor for the soil excavation and landfill disposal. Costs will include meeting with the regulatory authorities and costs associated with permitting. Funds will also be used for preparation of QAPP and HASP. Approximate cost: \$90,000. Outputs: QAPP, finalized ABCA/remedial action report, HASP, SGMP, WNDR Construct on a Historic Fill Site Permit and technical/bidding documents.

Task 2 Site Cleanup - The contractual costs are associated and excavating/transporting/disposing impacted soil to a licensed landfill. The remedial construction costs will be much higher than the costs presented in this task. Therefore, the city will pay for the construction costs with other funding sources and use these eligible expenses as the 20% match. Approximate cost: EPA Cleanup 6,300 tons at \$60/ton for \$377,000, City Cost share 1,666 tons at \$60 for \$100,000.

Task 3 Monitoring and Documentation – Remedial activities will be documented for reporting to the EPA and WDNR. A QEP will be on the site to observe the remedial construction activities, take photographs of the work progress, monitor for potential off-site impacts, and be available to answer any questions that may arise as construction progresses. Approximate cost: \$30,000. Output: One remediation documentation report and One WDNR Closure Request.

Task 4 Community Involvement – The City will engage the community within the Target Area, local neighborhood groups, and community health officials. The meeting will be held during the monthly RDA meetings. This activity includes costs associated with the development of a Community Relations Plan (CRP), publication, preparation, and distribution of community involvement materials including the CRP and any contractual costs needed in the preparation or attendance of the involvement and outreach activities. Approximate Cost: \$3,000. Output: CRP, meeting minutes from RDA minutes, presentation materials, site fact sheets and increased community knowledge and understanding of the cleanup activities.

c. Cost Estimates and Outputs

Budget Categories		Project Tasks				Total
		Task 1 Cleanup Planning	Task 2 Cleanup Activities	Task 3 Monitoring and Documentation	Task 4 Community Involvement	
Direct Costs	Personnel	\$0	\$0	\$0	\$0	\$0
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$0	\$0	\$0	\$0	\$0
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$500	\$500
	Contractual	\$90,000	\$377,000	\$30,000	\$2,500	\$499,500
	Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$90,000	\$377,000	\$30,000	\$3,000	\$500,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Federal Funding		\$90,000	\$377,000	\$30,000	\$3,000	\$500,000
Cost Share		\$0	\$100,000	\$0	\$0	\$100,000
Total Budget		\$90,000	\$492,000	\$30,000	\$3,000	\$600,000

d. Measuring Environmental Results

The City of Oshkosh RDA will develop a detailed schedule and work plan for implementation planned outputs under the proposed grant. We will document, track, and evaluate the following outcomes on an on-going basis: (1) acres of land redeveloped; (2) private investment dollars leveraged; (3) other funding leverage, including other local, state and federal grant funds; (4) increased property and sales tax revenue generated supported by this development; (5) reduced health risks and reduction in storm water impacts; and (6) site closure with the WDNR. Anticipated project outputs will include a Work Plan, Quality Assurance Project Plan (QAPP), community meetings, finalized ABCAs, website development, and social and print media strategy. The City will track the success of the outputs and outcomes through quarterly reports, which will be submitted to USEPA via ACRES. ACRES will be updated throughout the life of the project. The City will also update the public with successful outputs and outcomes on the City’s website and the Brownfield Inventory Tool (BIT).

4. Programmatic Capability and Past Performance

a. Programmatic Capability

i. Organization Structure

The City has successfully managed numerous grants in accordance with individual funding requirements and 24 CFR Part 200. Ms. Trena Larson is the Director of Finance and is responsible for comprehensive financial administration and planning for the City. The City has always received a ‘clean’ audit opinion with no adverse findings. Based upon our previous grant management experience, the City of Oshkosh is well qualified to undertake the responsibilities associated with an Assessment Grant including completion and submittal of a Cooperative Agreement and Work Plan to the EPA, and submittal of progress reports to the EPA Region 5 Office, including specifying the assessment tasks completed, financial tracking and proposed grant activities. This project will be managed by Mr. Allen Davis, Community Development Director, and the Project Manager / Grants Coordinator Ms. Darlene Brandt.

Mr. Allen Davis has a Master’s Degree in Planning and over 30 years experience in planning and development, as well as grant administration. He is highly knowledgeable about the development in the community and believes in a hands on approach in overseeing (re)development projects and grant administration. Mr. Davis was a key figure in the development of the Imagine Oshkosh plan.

Ms. Darlene Brandt also has over 20 years experience administering a variety of grants awarded to the City, including the City’s annual Federal community development block grant entitlement funds, US Department of Commerce Economic Development Administration grant, Wisconsin Economic Development Corp. site assessment and cleanup grants, and Wisconsin Department of Natural Resources Stewardship Riverwalk grants, to name a few. She has also successfully managed previous EPA pilot, assessment and cleanup grants awarded to the City.

ii. Acquiring Additional Resources

The City does not have the staff expertise to conduct environmental assessment or cleanup activities. The City will follow the procedures in CRF Part 200 and will request proposals from qualified professional consulting firms with expertise in environmental assessments and brownfields redevelopment to assist with the prioritization process, site assessment, community outreach, and other eligible programmatic activities allowed.

b. Past Performance and Accomplishments

i. Currently has or Previously Received an EPA Brownfields Grant

(1). Accomplishments

EPA Cooperative Agreement	Year of Award	Accomplishments
BF-00E04601 (Cleanup)	2006	Cleanup for development of a commercial center. Leveraged \$4,412,000 and created 16 jobs
BF-00E67201 (Assessment)	2007	The assessment of 45 properties; developed 5 RAPs/ABCAs.
BF- _____ (Cleanup)	2009	The proposed redevelopment of this site did not proceed during the grant period. The City felt the best use of the EPA grant and the City's funds set aside for this site, was based on a development plan for the site. No additional redevelopment projects came forward, and the City returned all the grant funds to EPA. During the grant period, however, all grant requirements regarding progress reports and ACRES updates were met by the City. The City regularly communicated with Region 5 EPA Office staff regarding the status of this grant.

(2). Compliance with Grant Requirements

The City of Oshkosh was successfully awarded 6 EPA grants since 2000. The grants complied with approved workplans, schedules, and grant deliverables, terms and conditions. Quarterly performance reports and ACRES reporting was submitted on time and accepted by EPA for all grants. Even though the 2009 cleanup grant was returned to EPA due to non-development of the site, the City complied with all terms and conditions of the grant.