

CITY OF OSHKOSH APPLICATION FOR EPA COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANTS:
HAZARDOUS SUBSTANCES AND PETROLEUM – OCTOBER 15, 2010

Section III C

Threshold Criteria for Assessment Grant Criteria

1. Applicant Eligibility

For this funding, the City of Oshkosh is classified as a “General Purpose Unit of Local Government.”

2. Letters from the State or Tribal Authority

The letter of support and acknowledgement from the Wisconsin Department of Natural Resources (dated September 24, 2010) is attached to this application.

3. Site Eligibility and Property Ownership Eligibility

Not applicable. The City is applying for hazardous and petroleum community-wide assessment grant.

Section V.B.

Ranking Criteria for Assessment Grants

1. Community Need

The City of Oshkosh was known as the sawdust city due to its long industrial history centered on logging and wood product manufacturing dating back to the late 1800's. A large industrial base was soon established to support the lumber industry, which included foundries, manufacturing of logging tools, finished wood products, and railroad and river boat transportation. By the 1960's, the logging industry came to halt and so did Oshkosh's economic boom. Many of the properties left behind from the demise of the logging industry continue to be blighted. Many of them contaminated with petroleum and other hazardous substances.

Not only is the City dealing with its past industrial heritage the City's current manufacturing sector has drastically diminished. The recent loss of several hundred manufacturing jobs associated with the closing of Morgan Door Company was significant loss for this community. In addition, the recent economic recession has resulted in the closing of several important employers, which included the Sears Holding Corporation, Hartwig Transit, Inc., Oshkosh B'Gosh Inc., Marvel Mfg. Company Inc., Jeld-wen, GE Oil and Gas Operations, and Radford Company Inc. The closing of these business resulted in the loss of an additional 477 jobs. In August 2010, the United States Postal Service (USPS) notified the Oshkosh community that the Oshkosh Processing and Distribution Center would be closed with the loss or relocation of 149 employees and an estimated annual loss of \$31,000,000 in generated revenue.

a. Health, Welfare, and Environment

- i) 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 riverfront is high-profile area of the city because people traveling from the north side of the city to the south side must cross one of four bridges. Anyone crossing the bridges sees the remaining portions of the industrial core but also sees the evolution of new uses and new development coming back into the central city (as evidenced by ongoing redevelopment activity occurring in the Marion Road Redevelopment Area in which EPA has been a valuable partner). For the immediate surrounding neighborhood, this grant will allow for the conversions of former blighted industrial properties into productive and functioning properties.

The majority of Brownfield properties are located in the Redevelopment Areas as described in Section 2.a., which in general includes Census Tract #5 on the north side of the river and Census Tract #12 on the south side. Previous EPA Assessment Brownfields Grants were used inventory over two hundred different parcels in both these areas of which 75 were considered Brownfield sites. Because of the City of Oshkosh's industrial past, many of these Brownfields are former heavy manufacturing facilities that used a broad array of hazardous chemicals. Specific example is the former Morgan Doors manufacturing facility. The site is comprised of 24.46 acres and has approximately 150,000 square feet of buildings dating back to the late 1800's. Some of the outbuildings are in poor condition and the site is known to be a former landfill. Contamination at this site could include solvents, arsenic, lead, petroleum, and chlorophenolic chemicals used in the treatment of timber and lumber. However, additional due diligence is needed to confirm the presence of the landfill in which additional EPA funds are needed. In addition, the redevelopment areas contain auto salvage yards, abandoned gas stations and service repair shops, and metal fabrication facilities.

Unfortunately many of these Brownfields are not only located in residential areas; they are also located in areas home to sensitive populations, particularly of children under 5 years old and senior citizens over the age of 65. According to 2000 Census and EPA Enviromapper data, 20.2% of the population in the central city area was below 5 years old or above the age of 60, greater than the Wisconsin average of 19.9% and the US average of 19.8%. These two sensitive populations often have a disproportionate rate of lead poisoning, asthma, and chronic illnesses.

The higher percentage of population in the central city area which is below 5 years old or above the age of 60 is significant issue because majority of the homes in these areas were constructed prior to 1950 and may have lead-based paints and asbestos containing materials. www.Scorecard.org, the Pollution Information Site ranked the Oshkosh Redevelopment Areas in the top 90% of counties in the US for the highest number of housing units with a high risk of lead hazards and the top 90% of homes built before 1950. The City of Oshkosh has used previous EPA Grants to identify, characterize, and raze homes that are abandoned or pose a risk to the public. These new grants will assist with the City's efforts to further characterize neighborhoods and homes to limit exposure of children and older adults to hazardous materials.

One of the goals of the City's Comprehensive Plan and the Downtown Design and Redevelopment Plan is to move the older industrial facilities to established industrial parks. According to Scorecard, Oshkosh Redevelopment Areas were ranked in the top 80% of counties in the US for the air releases of recognized carcinogens. As discussed in Section 2.a.i, one of the EPA Grant project areas is to expand the Witman Airport Industrial district to include several older industrial properties. Expansion of the Witman Airport Industrial district will open additional properties to move some of the older industrial facilities out of the residential redevelopment areas reducing exposure of carcinogens. Additional EPA grant funds are necessary to help redevelop the blighted industrial properties.

b. Financial Need

- i) As indicated in the above Section 1, Oshkosh has seen a decline in its manufacturing based since the 1960's. According to the Wisconsin Department of Workforce Development, the annual average unemployment rate for the City of Oshkosh was 8.6% in August 2009, which is higher than it was for the Appleton-Oshkosh-Neenah Metropolitan Area (7.6%), and the State of Wisconsin (7.6%). This higher unemployment rate can be attributed to several manufacturing businesses closings or downsizings over the

past year. When 22.3% of a community's jobs are related to the manufacturing industry, downsizings and closings have a significant effect on many Oshkosh citizens and families.

The Redevelopment Areas have been designated by the Department of Housing and Urban Development as Low to Moderate Income (LMI) census tracts. Based on EPA Enviromapper data, these areas have 30% to 40% of families are below the poverty rate, this is significantly above the US average of 9.2% according to data from the 2000 US Census. In addition, 31.3% of household income is below \$25,000 (EPA Enviromapper), which is significantly lower as compared to the US Medium Household Income of \$41,994. This has led to a higher rate of 3.4% (2000 Census Data) of the City of Oshkosh population affected by property crime as compared to the Wisconsin 2.8% (2000 Census Data), and to the US rate of 3.0% (U.S. Department of Justice, 2009 Crime in the United States report).

Redevelopment and blight elimination is an important part of reversing those difficult statics. While we have been able to utilize some local funds (typically confined to Tax Increment District areas), the role of state and federal grant funds has been continually important in the assessment and cleanup of Brownfields sites in the city and which the City does have a successful track record in such efforts as evidenced by the number of assessments completed and sites cleaned utilizing EPA funds.

Due to the current status of the economy and the expected reduction in key state revenues, the proposed 2010 City budget will see a shortfall of \$1.2 million in expenditures over revenues. In addition, the City will see an estimated 2.8 percent drop in revenues from the state and the State of Wisconsin is not going to increase the 2% state tax levy freeze to overcome the shorted of revenues. The City does not have the staff expertise to conduct environmental assessment or cleanup activities, and this freeze continues to make it nearly impossible for the City to budget any Brownfield-related assessment or cleanup funds. Currently, the City has an EPA Community-Wide Hazardous Assessment Grant. However, this grant is nearly exhausted. Additional funds are needed to address other sites in designated redevelopment areas and across the community to maintain the momentum generated by previous success stories.

2. Project Description and Feasibility of Success

a. Project Description

Brownfields in the city are predominantly along both sides of the Fox River corridor and in the central city area. The City has a long history of manufacturing and industrial uses on the banks of the Fox River and this is one of several efforts that continue to change the face of the river corridor. The affects of Brownfields on the community include a reduced property tax roll, inefficient use of land, and incompatible/conflicting land uses. Downtown Oshkosh is in a "rebirth/renewal" phase as is evident with the implementation of the Downtown Action Plan and the construction and conversion of several housing units. Old, vacant, and blighted properties are not complementary neighbors for the central city area.

The City will continue to use its Brownfield inventory that was prepared with Brownfield Pilot funds. Over time, this inventory has expanded as redevelopment opportunities have arisen in the central city area. Areas with high priority have been identified in special area plans and redevelopment plans. Also, the City's vision for promoting Brownfield redevelopment is reinforced in the 2005 Comprehensive Plan. The Comprehensive Plan includes several goals related to Brownfield redevelopment, including:

- Continue revitalization efforts of the downtown and central city area.
- Promote environmentally sensitive and responsible utilization of land, incorporating permanent open space and natural resources.

- Encourage the efficient and compact utilization of land.
- Promote the re-use of land and buildings.
- Encourage redevelopment in the central city to be oriented toward the lakefront and riverfront.

All these goals have specific implementation actions associated with them. Actions include pursuing various sources of funding for implementation of these plans.

To achieve the Brownfield redevelopment goals established within the City's Comprehensive Plan, the City developed the Downtown Design and Redevelopment Plan. The Downtown Design and Redevelopment Plan is a result of several community "Town Hall" meetings, small group sessions, and one-on-one interviews. The Plan focuses on nine critical areas that are to promote reuse of Brownfields and prevent the creation of future Brownfields:

- Maximize economic development and land use opportunities within downtown Oshkosh and along the Fox River.
- Create a special place to celebrate community life.
- Celebrate the City's cultural heritage and enhance its civic image.
- Provide safe, efficient, and convenient vehicle and pedestrian transportation and circulation throughout the City and make downtown user-friendly.
- Maximize riverfront linkages and pedestrian connectivity to the downtown and surrounding community.
- Create open spaces and recreational activates and promote environmental preservation.
- Enhance and maintain the public realm.
- Increase downtown residential development.
- Establish mechanisms to make plans happen.

The Downtown Design and Redevelopment Plan and Comprehensive Plan have identified six main areas for redevelopment in the Census Tract #5 and 12. Redevelopment concept plans for the six areas take into account all of the City's goals described above.

Both plans also take into account the role of the Fox River, which is part of the City's rich heritage. The Fox River will be made more accessible to the public through the use of public parks/open space and trail systems. The economic, transportation, public parks/open space needs of the adjacent neighborhoods is also taken into account through the continued partnership between the public and the private sector. The current status and future activities of the priority areas follows:

Near East Neighborhood - 20-block, 370-parcel sector of Oshkosh has suffered from neglected housing stock, depressed tax values and frequent police calls. The city purchases blighted multi-family rentals that are prone to police contacts and converts them for single-family use to further increase owner-occupied properties in the area. The City has utilized EPA Assessment Grant funds for the assessment (Phase I ESAs) of three different properties and will continue to move forward with acquiring additional blighted properties as they come available.

100, 200, and 300 Blocks of North Main Street – A new six-story commercial/apartment building was completed on the 100 block. The City and the Wisconsin Department of Transportation has completed improvements for the 100, 200, and 300 blocks of North Main Street. The City has completed the 100 North Main Street redevelopment with a multiuse residential/commercial building in 2005. The City used TIF funding to complete the project.

Riverside Park – The City has completed this project with the use of EPA Cleanup funds, Wisconsin Department of Natural Resources (WDNR) Green space funds, and other public and private funds. The Park officially opened in May 2005.

North Main Street – Upper floor conversions have been completed on the Bent Block Building (commercial businesses and 12 apartments) and the Webster Block Building (commercial businesses and 10 apartments). Projects include 448 N. Main (commercial businesses and 4 apartments) and 110 Algoma Blvd (commercial businesses and 8 apartments). Many of the new apartments are designated as low to moderate income rental units. EPA Assessment Grant funds assisted with the property due diligence for both sites. The City has budgeted in the 2011 budget for the purchase of two blighted properties called Gunderson Cleaners and Thomson Photography. Both properties maybe impacted with dry cleaner solvents. While the City has budgeted for the purchase of the properties, the purchase is contingent upon results of a Phase I and II ESAs. The City will need additional EPA Assessment Grant funds to complete the Phase I and II ESAs and prepare Analysis of Brownfield Cleanup Alternatives (ABCA) to complete the redevelopment plans.

East Eighth Avenue Redevelopment Area – Located in the South Side Redevelopment Area, this area consist of one city block that has a history of foundries, scrap yards, and paper manufacturing. The City has performed a Phase I and Phase II utilizing existing EPA Assessment Grant funds and currently owns the property. The City was awarded an EPA Cleanup Grant for this property. The City is moving forward with the razing of the redevelopment area structures in the next month. However, the City will need to use EPA Assessment Grant funds to complete the Analysis of Brownfield Cleanup Alternatives (ABCA) to complete the redevelopment plan. The ABCA is an important piece of the redevelopment of this parcel.

Ninth Avenue and Pioneer Drive Redevelopment Area – This Redevelopment Area has been included as part of the larger South Side Redevelopment Area, the City's most recently created redevelopment area. To move forward with its redevelopment plans, the City has budgeted in its 2011 budget to acquire the following properties:

- Former Pioneer Hotel – This hotel complex is located on Lake Winnebago at the mouth of the Fox River and considered one of the prime properties in the City. However, since the Pioneer Hotel went out of business in 2000, the complex has become blighted and a public hazard. Because of its blighted conditions the stigma of a Brownfield site has prevented the redevelopment of this unique property. Once the property is purchased the existing structure will be razed. Plans for this property include extending the Fox River Riverwalk along the shores of this property.
- Morgan Doors – The former Morgan Doors facility occupies four different parcels and approximately 30 percent of the South Side Redevelopment and nearly 70 percent of the Fox River south side shore line. Purchase and redevelopment of this facility is significant to the success of the South Side Redevelopment Area and to the Riverwalk trail system.
- Buckstaff Manufacturing – Buckstaff is one of the oldest manufacturing facilities in Oshkosh and occupies one city block with views upon Lake Winnebago. Currently, the City is looking at moving this manufacture to its industrial park because the facility does not fit into the city's redevelopment plans and to reduce residential exposure of chemicals produced by the facility. Due to current economic conditions, relocation of this manufacture will not occur without the assistance of the City.
- West 8th Avenue – The City has already purchased half of this city block and is ready to purchase the remaining four parcels. The City has already razed the buildings and performed UST removals

and environmental site investigation on the parcels it owns. Purchase of the remaining blighted properties is necessary to complete redevelopment of this city block.

While the City has budgeted for the purchase of the properties, the purchase is contingent upon results of a Phase I and II ESAs. The City will need additional EPA Assessment Grant funds to complete the Phase I and II ESAs and prepare Analysis of Brownfield Cleanup Alternatives (ABCA) to complete the redevelopment plans.

Marion/Pearl Redevelopment Area – The Marion Road Redevelopment Area is an ongoing project for the past four years. This area is an integral link between the University of Oshkosh and downtown. Construction of the new Marion Road is complete and serves as a transportation route between the University and downtown. The City completed Phase I and Phase II ESAs on the eight properties and three ABCAs using EPA Assessment Grant funds. Parts of Marion/Pearl Redevelopment Area have been redeveloped using EPA funds. A 51-unit apartment building (Morgan Crossing), assisted living facility, pharmacy, and office building have been completed as part of redevelopment of the site. The City's three EPA Cleanup Grants have been used or are currently being used to assist with cleanup for the redevelopment. Future developments include a public park adjacent to the Fox River and a public trail system running along the river. However, one 6 acre manufacturing complex (Lamico Manufacturing) remains in the Marion/Pearl Redevelopment Area. The city has budgeted in its 2011 budget to purchase the property and relocate the facility to its industrial park. However, the City will need additional EPA Assessment Grant funds to complete the Phase I and II ESAs as part of its due diligence process.

An important part of the City's redevelopment plans is to move manufacturing (Buckstaff and Lamico) from the redevelopment areas to planned industrial parks where land use is similar. The City has budgeted for 2011 to purchase several blighted properties adjacent to the current Witman Airport Industrial Park and expand the industrial park borders to include the properties. EPA Assessment Grants funds will be need to complete the City's due diligence process.

As indicated above, the City has planned and budgeted to move forward with the next phase of redevelopment as part the Downtown Design and Redevelopment Plan and Comprehensive Plan. While additional redevelopment work has been budgeted, the final purchase is contingent upon completion of Phase I and II ESA process. However, the City will need additional EPA Assessment Grant funds to complete the Phase I and II ESAs as part of its due diligence process.

The City will also continue to pursue additional redevelopment opportunities on the parcels identified in the Background Study conducted with EPA Pilot funds as the properties become available. Expenditure of assessment funds will be concentrated in (but not limited to) priority these areas to encourage the redevelopment of areas that have been underutilized or are vacant at this time. Assessment funding would be aimed at areas where the opportunities for parcels to be grouped together and redeveloped as a whole are good. These opportunities exist within the area included in the original background study.

To determine site eligibility, the City will use the process already in place in working with Region 5 EPA staff. A request for eligibility determination is forwarded to the EPA project manager with information that is required for determination. Information in the request addresses questions from the Proposal Guidelines. The City presents why it believes the site is eligible and the EPA staff concurs or asks for additional information in order to determine eligibility.

b. Assessment Grant Proposal Budget

- i. The City of Oshkosh is submitting a community-wide petroleum and hazardous assessment with the intention of using the grant funds on multiple sites within the community. Activities in the budget below would only be conducted on sites where the EPA has made a determination of eligibility.

Proposed Budgets for Hazardous Substance Assessment Grant

Budget Categories	Task 1 – Phase I ESAs	Task 2 – Phase II ESAs	Task 3 – Remediation Planning	Task 4 – Community Outreach	Task 5 – Eligible Programmatic Costs	Total
Personnel						
Fringe						
Benefits						
Travel					\$3,000	\$3,000
Equipment						
Supplies	\$1,500			\$2,000		\$3,500
Contractual	\$15,000	\$125,000	\$51,500	\$2,500		\$194,000
Total	\$16,500	\$125,000	\$51,500	\$4,000	\$3,000	\$200,000

Proposed Budgets for Petroleum Substance Assessment Grant

Budget Categories	Task 1 – Phase I ESAs	Task 2 – Phase II ESAs	Task 3 – Remediation Planning	Task 4 – Community Outreach	Task 5 – Eligible Programmatic Costs	Total
Personnel						
Fringe						
Benefits						
Travel					\$3,000	\$3,000
Equipment						
Supplies	\$1,500			\$2,000		\$3,500
Contractual	\$15,000	\$125,000	\$51,500	\$2,500		\$194,000
Total	\$16,500	\$125,000	\$51,500	\$4,000	\$3,000	\$200,000

Description of Task Categories

Task 1 – Phase I Environmental Site Assessments: While the Brownfield inventory funded through the Brownfields Demonstration Pilot Grant served as a base line environmental review for riverfront properties, the City will need to conduct Phase I assessments on the parcel described in Section 2.A. and on a city-wide basis as opportunities for purchase or redevelopment become available outside of the inventory area. Phase I Assessments will be performed in accordance with ASTM E 1527-05 All Appropriate Inquiry. Information sources will include the Environmental Database Resource (EDR) reports, City properties in tax foreclosure, and the City’s public museum. Purchases associated with these information sources are listed in the supply category on the budget. This task will also include the contractual costs associated with conducting necessary updates to the City’s existing Quality Assurance Project Plan (QAPP). Copies of documents will be forwarded to EPA Region 5 staff.

Task 2 – Phase II Environmental Site Assessments: Phase II Assessments will be conducted and copies forwarded to EPA Region 5 staff. Environmental sampling and assessment will be completed in accordance with approved Quality Assurance Project Plans, Sampling and Analysis Plans and Wisconsin regulations.

Task 3 – Remediation Planning: Remedial Action Plans will be developed for properties that require remediation prior to or in concert with redevelopment. Along with developing these plans, meetings will be held to review alternatives and strategize on the most effective remedial options while considering redevelopment. Remedial Action Plans will be submitted to the appropriate regulatory agency for review and approval.

Task 4 – Community Outreach: This task includes activities that will continue to enhance the City's involvement efforts to keep citizens informed and involved with this grant project. Community outreach efforts include public informational meetings.

Task 5 – Eligible Programmatic Costs: This task includes costs associated with travel by city staff to Brownfield-related conferences and meetings, monitoring and enforcement of institutional controls(s).

Description of Budget Categories

Personnel and Fringe Benefits: No EPA funds will be used for personnel or fringe benefits of the staff people involved with administration of the EPA grant. Personnel and fringe benefits are treated as in-kind contributions from the City's general operating budget.

Travel: Total anticipated expenditures for travel is \$3,000 per a grant. This figure includes costs associated with regional and national conference attendance by one or more representatives of the city staff involved with the grant project during the grant funding cycle. All conference travel will be authorized by EPA Region 5 staff prior to registration.

Supplies: The total anticipated cost of supplies is \$3,500 per a grant. Expenditures for supplies include costs associated with the publication, preparation, and distribution of community involvement and outreach activities (Task 4) and the purchase of fire insurance maps, EDR database searches, historical Sanborn Maps, and local museum records for Phase I ESAs (Task 1). Other expenditures may involve the cost of supplies that may be beneficial for the conduct of Phase I and Phase II investigations and/or for compiling information on the projects. This may include field equipment, digital camera equipment and computer software or hardware. Prior to any equipment purchases, the project manager will seek approval from EPA Region 5 staff.

Contractual: The total anticipated cost for contractual services is \$194,000 per a grant. This figure accounts for costs associated with selected environmental consultants for the preparation of a QAPP and the conduct of, and reporting on, the Phase I and Phase II Environmental Site Assessments. The budget per each grant is the following: \$15,000 should cover the costs of conducting 6 to 8 Phase I Assessments, with an estimated cost of \$2,000 per Phase I, depending on the complexity of the site; and \$125,000 to cover the costs of conducting 5 to 10 Phase II Assessments, with an estimated cost of \$10,000 to \$30,000 per Phase II, depending on the complexity and contamination of the site.

The contractual budget per a grant also includes funds (\$51,500) for remediation planning after the assessment of the properties and \$2,500 for the selected environmental consultants to be present at community involvement efforts for technical assistance.

ii. Leveraging

The City has committed general revenue funds for in-kind services with Planning Services Division staff administering Brownfields grants. The City does not have any environmental staff. If additional environmental services are required beyond grant funds, Tax Increment Financing funds will be used to fill any funding gaps. Several Tax Incremental Districts exist within the City, seven of which are downtown in the targeted area where Brownfield funds have been concentrated.

At this time beyond general revenue funds and TIF funds, the City does have existing HUD-Community Development Block Grant (CDBG) funding to use on a very limited basis for assessment activities. However, these CDBG funds can be used more beneficially for activities such as property acquisition, environmental legal services, and demolition – activities that are not usually eligible with most funding sources.

In the past the City has used federal, state, and private funds for cleanup activities and will continue to pursue these grants as projects are proposed and as grant funds become available. The City is submitting a WDNR Site Assessment Grant for underground storage tank removal, asbestos abatement associated with demolition, and demolition of a building in the South Shore Redevelopment Area. Successful applicants will be notified in February/March 2010. The City is currently waiting on two applications submitted for the Wisconsin DOT Bicycle and Pedestrian Facilities Program Grant Application and Great Lakes Restoration Initiative Eastern Area State and Private Forestry Grant. The two applications are the design, construction, and the installation of a direct contact cover for the Fox River Riverwalk.

c. Programmatic Capability and Past Performance

i. Programmatic Capability

The grant will be managed by the City, namely the Department of Community Development and the Department of Finance. These two departments will use procedures currently in place for the City's existing grant funds. The Project Manager will be Mr. Darryn Burich of the Department of Community Development and the Assistant Project Manager will be Ms. Darlene Brandt of Community Development. Both Mr. Burich and Ms. Brandt have managed EPA Grants since 2000 and have attended EPA Grant training sponsored by the EPA including the 2009 Chicago training and ACRES training. The City is currently utilizing interns from the local university to help with categorizing greenhouse emissions. The City will work with the university to identify additional intern recruitment. Monies will, as they currently are, be drawn using the Automated Standard Application for Payments (ASAP) Voice Response System (VRS). Quarterly updates will be submitted and updated via ACRES.

1. Currently or Has Ever Received an EPA Brownfields Grant

Past Cooperative Agreements Between the City and the EPA:
 Fund Expenditure

EPA Cooperative Agreement	Year of Award	Project Award	Remaining Funds
BP-975386-01 (Pilot)	2000	\$200,000	\$0
BF-96520101 (Assessment)	2003	\$400,000	\$0
BF-96553901 (Cleanup)	2004	\$400,000	\$0
BF-00E04601 (Cleanup & Assessment)	2006	\$600,000	\$400,000

BF-00E67201 (Assessment)	2007	\$200,000	\$50,000
--------------------------	------	-----------	----------

Two of the existing Cleanup Grants BF-96553901 (Wisconsin Automated Machinery - \$200,000) and BF-00E04601 (Mercury Marine - \$200,000) are currently being utilized and will be exhausted by the end of 2009. The remaining Cleanup Grant BF-00E04601 (Parcel J - \$200,000) should be completed by September 2010. The remaining Assessment funds are earmarked for the Marion/Pearl Redevelopment Area. The requested Assessment funding will help support redevelopment in the remaining redevelopment areas.

Compliance with Grant Requirements

The City is current with their quarterly reports, their payment requests, and their financial reports. Preparation of the quarterly reports and the property profiles has been and will continue to be a joint effort between the city and its selected environmental consultants. The quarterly reports will be submitted on ACRES.

Accomplishments

Significant accomplishments have been achieved in the recent past with EPA grant funding as outline Section 2.a. Significant accomplishments achieved with the Pilot Grant and Assessment Grants includes a creation of a background study with a Geographic Information System (GIS) database with information on over 200 properties in the central city and riverfront areas, eighteen Phase I assessments, twelve Phase II assessments, four Remedial Actions Plans, and three ABCAs.

Using assessment funds is the first step in addressing Brownfield sites. The City is pursuing redevelopment of Brownfield sites to convert under-performing parcels to productive parcels that expand the City's tax base with infill development as opposed to new development consuming Greenfield sites on the periphery where infrastructure has to be expended in order to serve the new development.

Often time's parcels that are the subject of Brownfield assessment are either vacant or underutilized and, therefore, the assessed value of the property is not maximized. Brownfields also affect the value of other properties in the surrounding neighborhood. Nearby vacant, contaminated, or blighted land is a detriment when selling property. This in turn affects the fair market value of the property, which is directly related to the assessed value of the land and buildings. Two recent examples of underutilization include the 100 Block of North Main Street and a portion of the Marion Road Redevelopment Area.

When designated as a redevelopment area in 1985, eight parcels on the 100 Block of North Main Street had a total assessed value of \$119,700. Some of the parcels were vacant and structures on the other parcels ranged in condition from fair to poor to very poor. By designating the block as a redevelopment area, the City began to purchase parcels, demolish buildings, conduct environmental tests, and remove underground storage tanks. Following this initial investment by the City, a request for proposals was distributed and a development was selected that includes a seven-story building with commercial on the first floor, 64 high-end residential apartments, and underground parking. A certificate of occupancy was issued in September 2003 and the current assessed value is \$3,957,000.

The second example of where Brownfield assessment funds have been utilized is within the first phase of the Marion/Pearl Road Redevelopment Area, the former site of an abandoned foundry. Since redevelopment activities have commenced, the area has realized the development of four new commercial structures totaling approximately 32,000 square feet of leased or leasable space. The final job creation report to the Wisconsin Department of Commerce in February 2005 stated that 32 full-time employees and 98 part-time employees are employed between the four commercial buildings. Currently, the fair market value for these buildings is \$4,295,600. The Phase II

development of the Marion/Pearl Road Redevelopment Area started at the early part of October 2009 and is anticipated to be complete by the summer of 2010. The new development is anticipated to increase the assessed value of the Marion/Pearl Redevelopment Area by \$28.3 million. EPA Assessment funds and two EPA Cleanup Grants were used to assist with the cleanup and redevelopment.

The City will also continue to implement the actions and strategies of the Downtown Design and Redevelopment Plan and the Comprehensive Plan. These actions include the need to assemble parcels that are small and under multiple ownership into larger parcels that are more attractive for redevelopment. By redeveloping these sites and remediating where necessary, jobs are created in the construction, development, and the commercial sectors. The investment by the City and the redeveloper increases the ability to leverage resources for the project. The finished product is one that substantially increases the tax base of the once vacant and underutilized property.

The City utilizes the RFP practice when acquiring additional expertise and resource to perform a proposed project. In addition, the City will utilize minority and disadvantaged businesses when possible. The City also oversees projects where Davis-Bacon federal prevailing wage standards are required. The City's use of EPA and HUD funds provides the City with expertise from these agencies to have the most effective and successful projects.

Adverse Audit Findings

To date, the City has not had any adverse audit findings and has not been required to comply with special "high risk" terms.

3. Community Engagement and Partnerships

- a. A web page has already been created summarizing the City's current and previous brownfields grant proposals including this current grant proposal. Website visitors are given the opportunity to submit comments electronically about the grants and also give the name, phone number, and address of the project contact to submit any oral or written comments. The website address is:
http://www.ci.oshkosh.wi.us/Community_Development/Brownfield/Brownfield_plan.htm.

On **September 28, 2010**, the Oshkosh Common Council passed Resolution **09-366** authorizing submittal of this grant application. This meeting includes a public hearing and comment time period for any citizens to ask questions or make comments regarding the application submittal. This meeting is also televised on the local cable access station to reach additional citizens. While the resolution is not required for a community-wide assessment grant application it is an example of the City's commitment to engaging the community.

Preceding this meeting, the City published an advertisement in the "Oshkosh Northwestern" regarding the grant application and the Council meeting to consider the application. Within the advertisement, readers were informed about the grant proposal, the website address, and contact information. The purpose of the notice was to inform the public on the grant proposal and allow them to make comments and ask questions to staff or the Common Council. Any comments received would have been incorporated into the grant proposal.

Additionally, if successfully awarded, the City will publish a block advertisement in the "Oshkosh Northwestern" informing the public of the award and provide a 30-day comment period prior to executing the contract documents and work plan with the EPA. Within the advertisement, readers would be informed of the grant proposal, the website address, contact information, and details regarding the public comment period. The notice would also include information about the locations where a copy of the grant proposal is available for public review. These locations are the website, the City's Department of Community

Development, and the Oshkosh Public Library Reference Desk. The grant proposal will be made available online and at the library in order to provide opportunities to review the proposal at a time other than regular business hours.

The information in the block advertisement regarding the award will also be forwarded to Channel 10, the Oshkosh Community Access Television station and be posted in the community calendar/bulletin on this local media station and repeated several times throughout the review period.

The City will continue to update the webpage designed specifically for the City's current EPA grant awards and any future grant awards, including adding a new section for the quarterly reports that are submitted to the EPA. Major accomplishments will be conveyed through press releases to the local newspaper, radio stations, and public access television station.

The City took and will take a varied approach to enable the opportunity for citizens to comment in oral, written, and electronic formats. Also on the web page, the following statement was added "If persons requiring special accommodations (large-print, interpreters, etc.) wish to have these documents presented in a different format, please contact the Department of Community Development at 920-236-5055." This statement provides an additional opportunity for citizens needing any special accommodations to learn about the project.

In February 2003, the Common Council approved a resolution creating the "Redevelopment Authority of the City of Oshkosh, Wisconsin" (RDA). The RDA is a seven-member board whose primary focus is blight elimination, slum clearance, and urban renewal type programming for general redevelopment activities. Progress of the City's grant projects will be reported at Redevelopment Authority meetings, which occur every month. This meeting is open to the public and advanced noticed of the meeting's agenda is available to the public. Developers, citizens, consultants, and City staff have been and will continue to be involved in redevelopment planning at different phases of the reuse planning process. The City would anticipate using an open house process to solicit additional input for redevelopment projects. For example, after a design consultant prepared preliminary plans for the South Shore Redevelopment Area, City staff hosted an open house where all property owners within the Area were individually invited, as well as other interested parties being notified to come and view the proposed plans and submit any written or oral comments regarding the reuse plans. Recommendations from the neighborhood regarding a boat launch, rehabilitation of existing homes, and streetscaping were incorporated into the final plans prior to public hearings and adoption with the RDA and Common Council.

A majority of the City's central city/riverfront area is already contained in adopted designated redevelopment districts, namely the Marion Road Redevelopment Area (adopted by Common Council 1998), South Shore Redevelopment Area (2003), Oshkosh Centre Redevelopment Area (1980), and Excelsior/Badger Redevelopment Area (1977). Because these redevelopment districts are already in place, a significant amount of community involvement has occurred in the past, including committee meetings, meetings with property owners and future developers, and public hearings with the Plan Commission, Redevelopment Authority, Joint Review Board, and Common Council.

In the summer of 2009, a Steering Committee called Oshkosh Vision initiated a community-wide engagement process called Vision Oshkosh. The purpose of Vision Oshkosh was to further define the City's plans (Comprehensive Plan and the Downtown Design and Redevelopment Plan). Three primary techniques were used to gather information from the community: Visual Preference Survey (VPS), a

Demographic, Market and Policy Questionnaire, and the Vision Translation Workshop. The plan released in September 2009 indentified eighteen first priorities for the City.

- b. The City will continue to coordinate its redevelopment efforts with the state, regional, and local WDNR offices. The City has worked and will continue to work with local environmental authorities throughout their redevelopment process. On the local level, Ms. Kathy Sylvester (WDNR) has been integral in focusing our Phase I and Phase II assessments to meet the needs of developers while keeping the state's cleanup regulations a priority to protect human health and the environment. Ms. Kathy Sylvester and the WDNR will be part of the review and approval process for any remedial action plans and institutional and engineering controls. We will close sites using many different state mechanisms including their flexible closure regulations and VPLE program. The VPLE program basically gives the City exemption from future liability for any past contamination on the site once the site reaches a certain cleanup criteria. The State assumes the liability for any past contamination after the impacts on site have been assessed and remediated to the satisfaction of the WDNR. The liability exemption can be passed on to future property owners such as developers, which is a very attractive marketing tool for redevelopment. The City is currently pursuing a VPLE Certificate of Completion on five parcels within the Marion Road Redevelopment Area and has already received a VPLE Certificate of Completion (COC) on two parcels within the Marion Road Redevelopment Area. The city is also looking at VPLE process for several parcels located on the South Shore Redevelopment Area.

Generally, Mr. Tom Versteegen and Mr. Jason Scott from the Wisconsin Department of Commerce (Commerce) have been integral in overseeing and answering questions related to properties where Commerce redevelopment grants and the state petroleum cleanup funds have been used to investigate, remediate, and develop contaminated sites. On the State level, Ms. Darsi Foss and Mr. Bruce Urben have continued to be advocates for the redevelopment efforts of the City. The local and state representatives as well as the local public health department ensure that the public health issues are considered on each site for each contaminant of concern while allowing for a degree of creativity and innovation in handling environmental issues to allow for redevelopment. The City has open communication with all of these regulatory authorities in the form of phone calls, meetings, project updates, required reports, and presentations. The City redevelopment sites have been featured on many WDNR and Commerce promotional items.

Where appropriate, the City will also coordinate projects with the East Central Wisconsin Regional Planning Commission (ECWRPC). The Commission is the official comprehensive planning agency for the East Central Wisconsin counties of Calumet, Fond du Lac, Green Lake, Marquette, Menominee, Outagamie, Shawano, Waupaca, Waushara, and Winnebago. The ECWRPC has provided assistance with developing the city's transportation and comprehensive plans.

- c. Representatives of community-based organizations were contacted regarding the development of this proposal and plan a significant part of the redevelopment of Oshkosh. Each individual listed below was willing to serve as the organization's contact for any reference checks the EPA may conduct and provided support of this application or a role in the grant process.

University of Wisconsin-Oshkosh (UWO) – Tom Sonnleitner, Vice Chancellor of Administrative Services;
Phone 920.424.3030

Originally founded as the Oshkosh State Normal School in 1871, the university campus has had a presence in Oshkosh for over 130 years. The UW system owns over 150 acres in the central city with a

portion of the property along the river in close proximity to the city's redevelopment areas. The University believes that these redevelopment projects are vitally important to the future of the city and the University and they fully support the grant proposals. The City is currently using an intern from the university to develop a greenhouse gas inventory as part of the City's effort to reduce greenhouse emissions. This intern will provide assistance to determining how greenhouse emissions can be reduced during Brownfield redevelopment. This partnership will help educate future environmental professionals.

Oshkosh Convention & Visitors Bureau (CVB) – Wendy Hielsberg, Executive Director; Phone 920.303.9200

One of the key coordinators to local cultural events and activities is the Oshkosh Convention & Visitors Bureau (CVB), which is housed in the Oshkosh Convention Center, in downtown Oshkosh, overlooking the Fox River. The Oshkosh Convention Center hosts local, regional, and statewide conferences at the convention facilities and can provide facilities for EPA grant public meetings.

Oshkosh Area Community Foundation/Community Partnership Committee – Eileen Connolly-Keesler, Executive Director; Phone 920.426.3993

The Oshkosh Area Community Foundation (OACF) is a public charity serving Winnebago, Green Lake, and Waushara Counties. The Executive Director serves on the Community Partnership Committee, a committee that was charged with the responsibility of selecting a design consultant for the Downtown Action Plan. The OACF will continue to be one of the City's partners with the implementation of recommendations from the Downtown Action Plan and will provide a role in helping to keep the community informed.

Chamco Inc. – Elizabeth Hartmen, President/CEO, Phone 920.232.9786

Chamco, Inc. is a non-profit, industrial development organization that is dedicated to helping foster the greater Oshkosh and Winnebago County economies to improve the quality of life for its citizens and business community. Since 1960, Chamco, Inc. has led the charge in implementing programs to assist businesses in site selection and development, incentive programs, financial and legal assistance, area information, industrial park expansion and training programs. Chamco will assist with informing the business community of this important redevelopment tool and help identify sites.

Oshkosh Cycling Club – Brian Kinert, President, email Brain.kinert@oshkoshcyclingclub.com

Oshkosh Cycling Club (OCC) is a non-profit organization that promotes cycling in the City of Oshkosh. The OCC has recently played an important role with updating the City's Pedestrian and Bicycle Plan and would continue to assist the City in this EPA Grant by outreaching to our membership and the community. In addition, OCC will assist with re-use strategies for parcels that might best be used for bicycle/pedestrian trails.

Oshkosh Downtown Business Improvement District – **Contact Information NEEDED**

The non-profit Downtown Oshkosh Business Improvement District (BID) promote the positive attributes of Downtown Oshkosh as well as to encourage recruitment and retention of diverse businesses that will foster continued economic growth in our downtown commercial districts. The BID will provide information on the Brownfields programs to the business community and help identify sites that need assessment assistance, as appropriate.

4. Project Benefits

a. Welfare and/or Public Health

The 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. Further development and augmentation of the GIS database created during the EPA Pilot Grant will allow us to identify possible threats to human health and the environment from the historical industrial use of the target area for the past 100 years. These areas of concern will be investigated to determine the degree and extent of impacts and their possible threat to human health and the environment. Once identified, a remedial action plan can be developed to meet the needs of the development while addressing the contaminants of concern, and eliminating the threat of exposure due to direct contact, ingestion, inhalation, or impact to groundwater and surface water. In the past, we have used a combination of remedial measures including excavation and off-site disposal, capping impacted fill soil on site, performing risk assessments, performing statistical evaluations to demonstrate background conditions, and where “hot spots” exist, using state voluntary liability exemption programs and evaluation of more innovative remedial measures to protect human health and the environment.

Elevated metals, volatile organic compounds (VOCs), and polynuclear aromatic hydrocarbon (PAHs) have been detected in soil and/or groundwater on various sites within the Fox River Redevelopment Corridor. These concentrations are generally a result of historical manufacturing, foundries, and lumberyard operation along the Fox River during the turn of the century. The City is also making an effort to move manufacturing from the city center to planned industrial park. This will help reduce exposure toxic chemicals to residential homes.

By conducting the activities mentioned above, we could affect the environment; however, in almost all cases our actions will improve the environment. Many times it is both economical and feasible to determine the extent of impacts and leave these impacts on site using institutional engineering controls that are integrated with the development of the site. In such cases, measures would be taken to prevent the impacts from migrating further and providing barriers (parking lots, buildings, or berms) that will prevent direct contact. Sites with contaminants left in-place will require institutional controls placed on the property. Institutional controls can be in the form of a deed restriction, maintenance of engineering controls, and placement on the state’s GIS database for contaminated sites. Placement on the GIS allows anyone with internet access to review the most current environmental data on a site that has been submitted to the State. It allows the public to be aware of what environmental risks are associated with the property.

b. Economic Benefits and/or Green Space

i) Economic Benefits

Using grant funds for assessment activities will help lessen the burden on the City’s general revenue fund, so that general revenue funds can be shifted to non-environmental activities. The redevelopment of the riverfront promotes non-industrial mixed use re-use of the properties. To achieve a more vibrant downtown area, the area must be active a majority of the day not just the workday from 8am to 5pm. To achieve this continuous activity housing is a key part to the land use mix. The City has used HUD-CDBG and HOME funds to convert vacant upper floors of buildings in the downtown area to residential units and will continue to do so as the popularity of these units continues to rise.

The downtown will also become more attractive and accessible with construction of the Riverwalk that links to the existing WIOUWASH trail. This Riverwalk trail will add over 3.5 miles to the regional WIOUWASH

trail. Options for transportation choice and recreational choice will be attractive for all who choose to visit and live in the central city area.

The residential conversions and the Riverwalk plan meet the goals of the City's Comprehensive Plan and the basic tenets of new urbanism. Also, for developers interested in new urbanism-type projects, the City added "Article XIX. Traditional Neighborhood Development" chapter to the Zoning Code in December 2001. In this new urbanism chapter, provisions are made for smaller infill projects, for mixed uses and mixed housing styles, and aesthetic enhancements to provide a neighborhood atmosphere.

In general, the central city area is served by city water, wastewater, and stormwater systems. A number of transportation opportunities are available to this area, whether it be on the state highway system (44, 41, and 45), the city's public transportation route, the Fox River and Lake Winnebago water system, a regional recreational trail, and accessible to the sidewalk system. Within the city are opportunities for freight air transportation and freight rail transportation. Also, in this area is access to the electrical and telecommunications system. This study area is among a mixture of land uses, so that residents in the area can access the University of Wisconsin-Oshkosh, Fox Valley Technical College, elementary schools, city parks, and other commercial and service business without always getting in an automobile and driving to access these goods and services.

In 1999, Governor Tommy Thompson signed into law comprehensive planning legislation for the state's local units of government. The City's 2005 Comprehensive Plan meets the requirements of this legislation. Commonly referred to as the "Smart Growth" Law, this legislation requires local governments to prepare comprehensive plans 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. Redevelopment projects, such as the Marion Road Redevelopment Area and the South Shore Redevelopment Area, are consistent with Smart Growth principles.

With the City playing a role in the redevelopment process, whether as a land owner or as a partner in the process, the City can help accumulate small, undesirable parcels into larger parcels that look more attractive to redevelopers. The City can also lighten the risk a developer takes by doing some of the environmental assessment and cleanup work to make the site comparable to what a Greenfield site would offer. With the City being a partner in this process, this makes land abandonment less likely to occur and, therefore, prevents future Brownfields.

To date, the City has not adopted nor required energy efficiency building standards. In the 2005 Comprehensive Plan, the goal "Promote the re-use of land 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.

i) Greenspace

Providing sufficient park and outdoor recreation facilities and open space is an integral part of each redevelopment plan along the Fox River. Many of the parks and recreational opportunities located in the redevelopment areas are either deficient in recreational facilities or separated from the neighborhoods that will utilize them. Unfortunately, some of these sites are environmentally impaired. Environmental data collected from the City's EPA Brownfields Assessment Pilot Grant has indicated some levels of

contaminates are above State of Wisconsin direct contact levels. The City will utilize funds from the EPA Site Assessment Grants to further define the extent of contamination and assist with remediation planning. By utilizing the EPA Site Assessment Grants, the City can redirect capital improvement program funds that would have been used for environmental assessment and planning to pay for upgrading recreational facilities and parks.

In 2006, the City adopted the "Fox River Corridor Riverwalk Plan and Design Guidelines" that is consistent with the City's goal of creating an accessible riverfront trail along the Fox River. The trail system is over 3.5 miles in length and will provide a paved path through the heart of the downtown area on both sides of the river. To preserve this trail system, easements will be obtained where the City does not already own the property. The trail system will be a part of the City's public park system and publicly managed and maintained. The trail system will be accessible to pedestrians, boaters, fishermen, and other recreational users.

In 2009-2010, the City anticipates commencement of construction of Riverwalk facilities in the Marion Road Zone identified in the Riverwalk Plan. The construction will be done in association with the hotel/restaurant and office building and connect at various points to the developments. Additionally, a public riverfront park (approximately 1.16 acres) will be developed along with the Riverwalk facilities. Transient docking facilities will also be developed.

c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

The City is essentially trying to give the river back to the residents of the city one parcel at a time. For decades, the riverfront has been home to the industrial properties that helped to build this city and the Fox River corridor. Now, the industries are being moved to planned industrial parks and the riverfront is being transformed into a place for personal enjoyment and enhancing one's environmental well being. The City completed its first green space riverside Brownfield cleanup project in spring 2005. The Riverside Park project was a former manufactured gas plant converted to open space, which added 7 additional acres to an existing park on the city's waterfront. The additional open space project includes construction of a segment of the City's Riverwalk, additional green space, and public parking for access to the Riverwalk. Landscaping of the green space and Riverwalk will consist of native perennial plants and native canopy trees. The landscape materials selected should require relatively low maintenance and have the ability of survival in extreme conditions, which will reduce maintenance and resource consumption. By promoting public spaces and Brownfields redevelopment in accordance with the City's 2005 Comprehensive Plan and Downtown Action Plan, the city of Oshkosh is becoming a community known for its river and lake access for many years to come.

There was great discussion during a recent Common Council meeting of incorporating green building and energy efficiency building standards into future developments. Future redevelopment projects will need to include some components or a LEED certification. The buildings will look at incorporating green building features such as a south side facing atrium that will take advantage of direct sunlight for heating and light. Developments will also look at creating landscaped buffers along the Fox River to reduce stormwater sheet flow into the Fox River. 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. 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. Excess fill material that cannot be reused on site will be used on a landfill for daily cover. The City has completed and is planning large demolition projects of existing buildings on several redevelopment sites. Concrete and masonry from the 142,000-square foot Miles

Kimball building and the 70,000 square foot Mercury Marine building were crushed on site and reused as backfill. The City incorporates mandatory recycling of materials in all demolition contract specification.

Stormwater from parcels located on the riverfront must have at least a 40% reduction in suspended solids as required by local ordinances. Catch basins and green space on the parcels will be used to reduce the suspended solids.

The City in conjunction with EPA Region 5 completed the first ABCA 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 ABCA, showing our commitment to sustainable reuse.

On September 11, 2007, the Oshkosh Common Council approved the U.S. Mayors Climate Protection Agreement. The City is committed to moving forward with green building and improving energy efficiency building standards with its developments.

d. Project Outcomes and Outputs

The City plans to track and measure their success relative to the grant in general accordance with EPA Order 5700.7 and EPA 2003 Strategic Plan. The City will look at their progress by the competition of certain project outputs and outcomes for certain sites. Successful outputs may include additional properties and information added to the City's Brownfields GIS database, completed Phase I ESAs on at least eight sites and Phase II ESAs on eight different properties, and development of a remedial action plan for two to four different sites.

The City will hope to achieve several intermediate and end outcomes. Completed remedial actions, successful requests for site closure and receipt of a COC, and Request for Proposals (RFPs) submitted to developers which incorporate environmental outputs will be considered successful intermediate outcomes. Successful goals for the City's Intermediate Outcomes includes two to four completed remedial actions, the installation of the 200,000 square feet of engineered barrier to limit exposure of impacted soils to the public and surface water to contaminated soil, which will help improve groundwater quality, and the petition of RFP from developers for up to four properties.

Final successful outcomes may be a long-term process but include successful development of a property, completion of a TIF district, additional public space and/or green space added to the community, and completion or partial completion of various development plans such as the Fox River Riverwalk Plan and components of the Oshkosh Downtown and Development Plan and Comprehensive Plan. Quantitative success for the City's long-term Outcomes may be measured by the following: 180,000 square feet of public space or green space developed, 2,750 feet of Fox River frontage developed for public use, site closure and/or receipt of a COC for up to six sites, creation of approximately 185 jobs, and a property tax value increase of approximately \$800,000.

The City will track the success of the outputs and outcomes through quarterly reports, which will be submitted to the EPA. The City will also update the public with successful outputs and outcomes on the City's website.