



Department of City Development
 City Plan Commission
 Redevelopment Authority of the City of Milwaukee
 Neighborhood Improvement Development Corporation

Lafayette L. Crump
 Commissioner

Vanessa L. Koster
 Deputy Commissioner

IV.D. Narrative Information Sheet

1. Applicant Identification:

Redevelopment Authority of the City of Milwaukee
 809 North Broadway
 Milwaukee, WI 53202-3617

2. Website URL

<https://city.milwaukee.gov/DCD/BoardsCommissions/racm>

3. Funding Requested:

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$500,000

4. Location:

- a. City of Milwaukee
- b. County of Milwaukee
- c. State of Wisconsin

5. Property Information:

- a. Name: 2900 W. Center Street
- b. Address: 2900 W. Center Street, Milwaukee, WI 53210
- c. Attached is a map of the project site.

6. Contacts

- a. Project Director:

Mat Reimer
 809 North Broadway
 Milwaukee, WI 53202-3617
 Phone: 414-286-5693
 Email: mreime@milwaukee.gov
- b. Highest Ranking Elected Official:

Lafayette Crump, Executive Director
 809 North Broadway
 Milwaukee, WI 53202-3617
 Phone: 414-286-5800
 Email: lcump@milwaukee.gov



7. **Population:** 569,330 (Census Population Estimates, July 1, 2021)

8. Other Factors Checklist:

Other Factors	Page #
Community population is 15,000 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 remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	4
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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 a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3, 4
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	

9. Releasing Copies of Applications: Not Applicable



2900 W. Center St, Milwaukee, WI



Site Location

Legend

Parcels

Tax Parcels



Cadastral

ROW Labels

Note

ROWDimension

ROWName

ROWNamePark

Radius

RailwayName

<all other values>

Administrative

Municipal Boundaries



Notes

0 50 100
ft

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

MILWAUKEE COUNTY GIS AND LAND INFORMATION

NARRATIVE / RANKING CRITERIA

1.a Target Area and Brownfields

1.a.i Overview of Brownfield Challenges and Description of Target Area (5 pts): Milwaukee was once home to many thriving industries, but over the past five decades Milwaukee has seen a decline in its traditional manufacturing base as companies have outsourced or moved to suburban industrial parks, leaving behind a legacy of brownfield sites and concentrated unemployment. With a population of nearly 600,000, Milwaukee is the largest city in Wisconsin and is most famous for its brewing industry. Some may also know it as the home to large companies such as Harley-Davidson, Briggs & Stratton, and Johnson Controls. Industry was foundational to Milwaukee's history, and it was dominated by die cast companies, machine tool manufacturers, tanneries, and foundries, providing well-paying, family-supporting jobs. Milwaukee's industrial past has left thousands of known brownfields and many more yet to be characterized brownfields. Unfortunately, a disproportionate number of Milwaukee's brownfield sites are located in a central portion of the City known as the 30th Street Industrial Corridor (the Corridor), a five mile stretch that was once a major manufacturing center, spanning a rail line, employing thousands of area residents. Today, however, the Corridor is the epicenter of the persistent poverty and severe racial segregation that plagues the city. The project site at 2900 W. Center Street is located within the central portion of the Corridor. According to a recent report by Marquette University Law School, the 2020 Census reconfirmed Milwaukee's status as one of the most segregated cities and metropolitan areas in the United States (John Johnson, 2022, Neighborhoods where Milwaukee isn't segregated). According to Brown University's Diversity and Disparities Project, metro-wide Black-white segregation declined slightly, but the Milwaukee metro still ranks 2nd-most segregated, just as in 2010. These dismal statistics point to how far Milwaukee remains from being a fair place to live for disadvantaged populations, primarily consisting of people of color. According to another recent report, a study ranks Milwaukee 4th worst place for African-Americans to live economically (2023, SmartAsset). The study broke down their finding into three categories: Median Income for a Black family, percentage of African-Americans in the workforce, and those who have a bachelor's degree. Out of 133 cities, Milwaukee finished nearly at the bottom, number 130. Unfortunately, these findings do pertain directly to the target area, as the per capita income for the target area is \$17,140, and 67% of the target area residents are classified as low income, likely due to a lack of higher education opportunities. This lack of opportunity negatively impacts target area residents physical and socioeconomic health. Award of an EPA cleanup grant for this site would allow the 2900 W. Center Street site to be transformed into an anchor for the community that would improve the social, environmental and economic conditions of the target area.

While this legacy of brownfields has been a detrimental to the target area's physical and socioeconomic health, these sites also provide an enormous opportunity. With strong community engagement and thoughtful planning, sites like 2900 W. Center Street can be reimaged and redeveloped into places that provide essential supportive services, community gathering places, and create opportunities for employment that will improve the socioeconomic, physical and mental health of area residents.

1.a.ii Description of the Proposed Brownfield Site (10 pts): The 2900 W. Center Street site is located in the central portion of the Corridor. The site is improved with an approximately 50,000 square-foot, multi-story warehouse building constructed in 1929 with several building additions. Historically, the subject property has been developed since at least 1894. Unfortunately, the majority of the buildings are unoccupied due to dilapidated building conditions and environmental issues at the site, which is causing a severe blight on the Metcalfe Park and Amani communities in Milwaukee.

Historically, the site was occupied by a creamery, laundry and printing companies, offices, taverns, a barber shop, adhesives manufacturer, and residential properties. The creamery operated on the main portion of the site from the late 1800s until the 1960s when an adhesives manufacturer began operations. The adhesive manufacturer utilized the site to manufacture hot melt adhesives until suspension of operations in 2003. The site also historically contained four underground storage tanks (USTs) including two gasoline USTs, one fuel oil UST, and one 8,000-gallon mineral oil UST.

Currently, the site is primarily unoccupied for reasons noted in this section, with the east warehouse utilized by the Jewish Community Pantry as a community food pantry since 2020. The western warehouses were vacated in 2018 and have been deemed unsafe due to vapor intrusion concerns. Both recent and historical environmental assessment activities have identified the presence of hazardous substances contamination in the site soils and the presence of vapor intrusion into on-site buildings.

In 1995 a release was identified beneath the southwest warehouse when two 300-gallon USTs were removed from the site. The tank systems were historically utilized to store petroleum products. Impacts from the USTs and associated use of industrial chemicals at the subject property were identified at the site. In 1996, approximately 39 tons of impacted soil was removed from

the site. Concerns of damage to the building limited the excavation and remediation. Following the UST and soil removal, further investigation identified soil impacts from petroleum constituents and various chlorinated volatile organic compounds (VOCs) such as tetrachloroethylene (PCE) trichloroethylene (TCE) and methylene chloride. In 2004, further investigation of the site was completed to define the extent of contamination. A review of the analytical results from 2004 indicated that soil impacts exceeding Wisconsin residual contaminant levels (RCLs) were identified at shallow depths. The highest concentrations were identified on the southwestern portion of the subject property. Based on the evaluation of data developed during the investigations at the site, the boundaries of contamination were sufficiently defined. The Wisconsin Department of Natural Resources (WDNR) closed the Leaking Underground Storage Tank (LUST) case and issued a Certification of Completion for the Voluntary Party Liability Exemption (VPLE) case in a letter in 2005, with continuing obligations related to residual soil contamination.

In August 2023, an investigation was conducted within the vacant western warehouse to evaluate current subsurface soil conditions and to determine if a potential risk of vapor intrusion may be present if the western warehouse building were to be occupied. Based on the VOC concentrations in soil, residual impacts are still present under the building and a new obvious release to the environment was not identified. Based on the sub-slab vapor concentrations detected greater than the State standards, a vapor intrusion issue was identified at the site.

1.b Revitalization of the Target Area

1.b.i Reuse Strategy and Alignment with Revitalization Plans (10 pts): The reuse strategy for the 2900 W. Center Street site is to expand the services provided by the Jewish Community Pantry (Pantry). The Pantry currently leases a building on the site and they are working to purchase and redevelop the parcel. The proposed redevelopment plan includes partial building demolition and razing a dock area. New construction will include a 7,000 square-foot building addition to the east of the Pantry, 12,000 square-foot building to the southwest of the Pantry, and construction of an approximate 37,500 square-foot parking lot. The Pantry would redevelop the site and create the Community Resource Center and Food Pantry by constructing a facility that continues to address emergency food needs, as well as provide residents much needed services and support, on a permanent, year-round basis. Beyond immediate hunger relief, community partners will offer job training, financial literacy programs, and access to social services, empowering individuals with skills and knowledge for long-term stability.

The Pantry, part of the Hunger Task Force Emergency Pantry Network, is the Jewish Community Center's communal response to hunger in Milwaukee. Since 1976, their mission has remained consistent: to provide emergency food to Milwaukeeans in crisis; to connect clients to community resources; and to increase awareness of hunger in Milwaukee. The Pantry reflects their organizational commitment to the Jewish values of Tzedakah (justice), Tikkun Olam (repairing the world), Kol Yisrael Arevim Zeh Bazeh (all are responsible for one another), and treating our community with Kavod (respect). Located at the intersection of the Metcalfe Park and Amani communities in Milwaukee, the Pantry provides fresh produce, a wide variety of protein options, whole grains, and dairy products to families in need of emergency food, as well as baby supplies (diapers, wipes, formula) and period products (tampons and pads). Notably, the Pantry is the only food pantry in Milwaukee that offers Kosher food for Jewish guests who observe Jewish dietary laws.

The Pantry is part of the USDA MyPlate initiative, a model that encourages people to eat healthy foods by choosing the right types and amounts of foods to eat. The Pantry educates their guests on what foods are best for their diets, and what foods are best to avoid for optimal health and wellness. To ensure that guests who rely on the Pantry have access to nutritious foods, the Pantry no longer distribute foods that are highly processed or high in fat or sugar. The Pantry's goal is to ensure that pantry clients feel good, stay healthy, and reduce direct and indirect chronic disease costs associated with obesity. Not only does the Pantry provide clients with 2-3 days' worth of food, but they also work with community partners to combat factors that contribute to poverty and food insecurity. The Pantry increases access to healthy food and needed supplies for families and individuals in challenging economic circumstances, and it is also a pathway to other available community resources. The Pantry continues to strengthen partnerships with local collaborators, and in doing so they increase their ability to support Pantry clients more holistically.

The reuse strategy of 2900 W. Center Street aligns with and advances the recommendations of two recent City of Milwaukee plans. In November 2020, Connecting the Corridor: A Strategic Action Plan for the Near North Side Plan Area (CTC) was completed. CTC was an action plan to advance projects in the neighborhoods surrounding the Corridor that would support and reinforce ongoing economic and neighborhood development efforts. CTC recommendations are grounded in public health and racial equity goals, and provide actionable projects and strategies to respond to community priorities in a way that will have meaningful impacts on health, safety, opportunity and access for residents of Connecting the Corridor neighborhoods. CTC employed extensive community outreach including 3 public meetings, 2 community walks, 1 business-focused meeting, 12 pop-ups at community events, 7 presentations to neighborhood groups, direct outreach (door-knocking, phone calls, newsletters), one-on-one meetings, and social media. CTC notes that health is impacted by social, environmental, and economic factors. In public

health, these are called upstream factors, or social determinants of health. CTC recommends supporting projects that impact the social determinants of health that can change systems and remove barriers to good health, enabling larger numbers of people to be as healthy as possible.

The second recent City of Milwaukee plan that the reuse strategy of 2900 W. Center Street. aligns with is the Fond du Lac and North Area Plan, which was completed in 2021. The Fond du Lac and North Area Plan is the work of many different stakeholders in the community. This is not just a document by and for the City of Milwaukee's Department of City Development (DCD). Rather, this Plan builds off dedicated and innovative work in progress. In addition to the original Fond du Lac and North Area Plan from 2004, several community partners have done their own neighborhood-level planning and organizing. The Plan aims to support and incorporate many of those goals into this Plan, which is DCD's official guide, adopted by the Common Council, for land use and development. The Plan includes policies and strategies that will help the City and its partners achieve successful outcomes. The policies and strategies reflect the community values that were voiced during the numerous community workshops. One of the strategies of the plan is to foster resilient communities. A resilient community is one that is able to not only survive, but to also adapt and thrive in the face of adverse circumstances. The target area has faced many challenges, and these challenges have often been borne disproportionately because of societal inequities and systemic racism. That said, the community has weathered these challenges, and is, in many ways, well positioned for the future. While we don't know exactly what the future holds, we look for ways to strengthen the area's resilience in ways that are safe, healthy, and sustainable, focused on local empowerment. To foster resilient communities, the Plan outlines policies and strategies related to health and safety. One of the strategies that is identified in the Plan that can be implemented to foster a resilient community is to expand access to healthy food and foster a culture of healthy eating. To help implement this strategy, the City of Milwaukee supports uses that expand access to fresh food, such as food pantries, and also supports efforts to expand health education to increase demand for healthy food, which this project will accomplish.

1.b.ii Outcomes and Benefits of Reuse Strategy (10 pts): The outcomes and benefits of the redevelopment strategy are numerous. For nearly 50 years, the Jewish Community Pantry's mission has remained consistent: to provide emergency food to Milwaukeeans in crisis; to connect clients to community resources; and to increase awareness of hunger in Milwaukee. Pantry neighbors in the Metcalfe Park and Amani areas face bleak statistics. According to the EJ Screen Report for the target area, the per capita income is \$17,140, 67% of the target area residents are classified as low income, and 97% of target area residents are people of color. Residents of these communities say poverty, food deserts, and pollution has made it nearly impossible to stay healthy. Residents talk about being stifled by an "invisible net" that blocks advancement and makes it nearly impossible to maintain good health. Environmental pollution is woven into that net (Harvard Public Health Magazine, Metcalfe Park: Inside structural racism's invisible net, 10/3/22). With so many families living well below the poverty line, thousands of people in the Pantry's service area struggle to meet their basic needs. Through the Pantry's partnerships with community leaders such as Hunger Task Force, Feeding America Eastern Wisconsin, the City of Milwaukee, Froedtert & the Medical College of Wisconsin, and more, the Pantry is considered an anchor organization in supporting Metcalfe Park and Amani residents. The Pantry works directly with two neighborhood groups to help achieve their mutual goals, groups which include Metcalf Park Community Bridges and Amani United. Metcalf Park Community Bridges and Amani United work to connect community members with health and wellness activities, focusing on efforts to assess community health concerns and hold regular wellness, food, and resource events. These groups are working to empower the community and improve the neighborhood block by block. In 2023, the Pantry served 22,000 individuals with a 3-5-day supply of emergency food. The Pantry's guests face a myriad of challenges when trying to meet their basic needs including transportation issues, legal issues, and joblessness, just to name a few. The Pantry does not currently have the square footage to provide the necessary support services to help guests meet the needs listed above.

Again, the Pantry has the opportunity to construct a new facility that continues to address emergency food needs, as well as provide residents much needed services and support, on a permanent, year-round basis. Beyond immediate hunger relief, community partners will offer job training, financial literacy programs, and access to social services, empowering individuals with skills and knowledge for long-term stability. The return on investment for this project will be realized in long-term social and economic benefits from interrupting the cycle of poverty. For example, improved financial literacy and job training will lead to higher employment rates and better wages for community members, increasing economic activity in the community. Providing comprehensive social support services will reduce crime rates and healthcare costs associated with poverty, benefiting our broader Milwaukee community. Additional benefits include the creation of approximately three new jobs at the new facility and thousands of dollars of new tax revenue for the City of Milwaukee. Also, the redevelopment of this site will spur redevelopment at adjacent/nearby sites because the community will be able to physically see the positive change occurring in their neighborhood.

Finally, project partners believe that sustainable features are integral to the project. RACM will request the redevelopment project include renewable energy, energy efficiency, and other sustainable features in the design and will also suggest various programs available to support these elements such as the City of Milwaukee's ECO-Design Guidelines for Commercial Buildings, Solar Shines Program, and Property Assessed Clean Energy financing program available through the City's Environmental Collaboration Office. Additionally, the redevelopment project will include landscaping features that will absorb stormwater, which will help reduce the risk of flooding in the area.

1.c Strategy for Leveraging Resources

1.c.i Resources Needed for Site Characterization (5 pts): RACM is not anticipating the need for additional assessment activities to delineate subsurface impacts. In the event that additional assessment activities are needed for the remediation to proceed, RACM does have FY23 EPA Assessment funds available that could be utilized.

1.c.ii Resources Needed for Site Remediation (5 pts): The EPA Cleanup Grant is projected to cover the majority of eligible remediation expenses. For those expenses not covered by the grant, RACM can use available funding from its local brownfield account to fund those expenses not covered by the EPA grant. These funds are secured as part of the municipal budgeting process. A second option for additional funding is the Jewish Community Pantry will bring close to \$1 million of their own funds to the Community Resource Center and Food Pantry project. The funds provided by the Pantry could be utilized to fund remediation activities as needed. See Attachment A for documentation of these secured funding sources.

1.c.iii Resources Needed for Site Reuse (5 pts): The Pantry is committed to this project and to Milwaukee. Again, the Jewish Community Pantry will bring close to \$1 million of their own funds to the Community Resource Center and Food Pantry project. Additionally, the Pantry has secured operational support from Northwestern Mutual Foundation of approximately \$50,000 per year. In December 2024, the Pantry will receive an additional \$100,000 from an anonymous donor. The Pantry will seek, and expects to secure, additional contributions from donors and foundations that have historically shown support for their program. The Pantry will seek up to \$500,000 from an anonymous foundation that has consistently supported the Pantry since 2000. Additionally, the Pantry will seek a \$1 million gift from another major Milwaukee Foundation. To complete the project, the Pantry will hire a firm to support their fundraising department in fundraising the remaining dollars.

The project team anticipates that the remediation and site development work will be fully funded. However, if there is a financing gap, RACM has a strong track record of successfully leveraging additional federal, state, and local funding, such as from Wisconsin Economic Development Corporation (WEDC) and the EPA Revolving Loan Fund.

1.c.iv Use of Existing Infrastructure (5 pts): The cleanup and partial adaptive reuse of the existing building being leased by the Pantry would maintain the integrity of the neighborhood by building upon existing infrastructure in an urban setting, versus development on a greenfield, which aligns with the component of the City's Comprehensive Plan to reduce urban sprawl. The site is well served via the surrounding public right-of way with ready access to municipal water, storm sewer, sanitary sewer, electrical, fiberoptic and natural gas. Lastly, the City of Milwaukee's cabinet-level Environmental Collaboration Office (ECO) was created by the Mayor to position Milwaukee as a leader in environmental sustainability and performance in the 21st century. ECO staff will encourage redevelopment of the site that will utilize existing infrastructure and create sustainable buildings that will focus on energy and water efficiency, and reduced waste and air pollution.

2.a Community Need

2.a.i The Community's Need for Funding (5 pts): RACM does not have the resources to implement the work described herein without support. As a land clearance authority operating under supervision of the City, RACM is subject to City budget constraints. In a September 2022 report entitled "Nearing the Brink: An independent, third party review of the City of Milwaukee's fiscal condition," the Wisconsin Policy Forum describes the City's four main financial challenges which include an unsustainable revenue mix, shrinking resources for core functions, diminishing reserves, and escalating long-term liabilities and warns of "a day of reckoning" that "has never been so close". Multiple corrective actions will be required, but until major structural changes are made, RACM is reliant on the EPA brownfields program for funding of the majority of its assessment and cleanup activities. At the site level, RACM is also unable to utilize one of the City's strongest financial tools – tax increment financing (TIF) – because the site is located in a low-income community. Due to the depressed economic conditions associated with the target area, sufficient property tax increment is not being generated to justify the creation of a TIF District.

2.a.ii Threats to Sensitive Populations:

2.a.ii.1 Health or Welfare of Sensitive Populations (5 pts): As is evident in the demographic table below, the target area has many sensitive populations including people of color, low-income residents, those who are unemployed, those with less than a high school education, and children. The minority, low-income, and unemployment rates, specifically, are all between the 90th

and 100th percentile for the state. The elderly population is 9% and children make up 35% of the population in the target area. These sensitive populations live near the site and could be potentially exposed to contamination at the project site.

Socioeconomic Indicators	Target Area	%ile in State	State Avg.	USA Avg.
Demographic Index Value	3.74	97	1.16	NA
People of Color	97%	98	21%	40%
Low Income	57%	95	27%	30%
Unemployment Rate	9%	90	4%	6%
Less Than High School Education	23%	94	8%	11%
Over Age 64	9%	17	18%	18%
Under Age 18	35%	NA	NA	NA

Source: EJScreen Report for 1-mile ring around 2900 W. Center Street

Exacerbating individual economic conditions, the presence or perceived presence of contamination at brownfield sites like 2900 W. Center Street reduces the overall marketability of the properties in the target area and negatively contribute as a blighting influence, attracting crime and impeding redevelopment in the wider community. Individuals making up the sensitive populations outlined above both suffer most from depressed economic conditions and stand to benefit the most from improved and enhanced supportive services that would result from a site that encourages reinvestment and redevelopment in the community. A cleanup grant for this site would improve the social, environmental and economic conditions of the target area by paving the way for a new facility that would directly address these issues with target area residents.

2.a.ii.2 Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 pts): Brownfields can also be a source of direct exposure to pollutants that can lead to disease and poor health. One of the most common public health concerns found on brownfield properties in Milwaukee, which are also present at 2900 W. Center Street, are near surface soil impacts, which includes VOCs and CVOCs. These contaminants present a risk to the public through dermal contact and ingestion, potentially exposing residents to health hazards such as respiratory problems, liver/kidney damage, nerve damage, eye and respiratory irritation, headache, nausea, and cancer. In fact, according to EJ Screen's Health Disparity data, residents in the target area are in the 95th to 100th percentile for rates of asthma and are in the 90th to 100th percentile for low life expectancy.

Another public health issue for the target area is lead poisoning. Lead can severely impact mental and physical development, even at low levels. Significant concentrations of lead are present on properties throughout the target area due to former industrial uses of properties as well as the prevalence of lead paint in older homes. The Environmental Public Health Data Tracker maintained by the WI Department of Health Services found that from 2018-2021 in children under age 6, 18% in census tract 89 had childhood lead poisoning, compared to only 2.7% of children statewide. Cleanup and redevelopment of the project site will directly address these public health concerns by removing contaminants from the community.

2.a.ii.3 Environmental Justice:

(a) Identification of Environmental Justice Issues (5 pts): The following table was generated using the EJScreen tool for the target area and it highlights the intensity of environmental justice factors facing residents in the immediate vicinity of the project site. Residents in the target area are faced with some of the highest EJ Indexes in the state, with 12 of the 13 indexes coming in at or above the 95th percentile (**bolded** below).

Selected Variables	Percentile in State	Percentile in USA
EJ Index for Particulate Matter 2.5	97	93
EJ Index for Ozone	97	98
EJ Index for Nitrogen Dioxide	98	98
EJ Index for Diesel Particulate Matter	97	96
EJ Index for Toxic Releases to Air	97	98
EJ Index for Traffic Proximity	98	99
EJ Index for Lead Paint	97	99
EJ Index for Superfund Proximity	96	96
EJ Index for RMP Facility Proximity	97	98
EJ Index for Hazardous Waste Proximity	98	98
EJ Index for Underground Storage Tanks	97	98
EJ Index for Wastewater Discharge	93	65
EJ Index for Drinking Water Non-Compliance	97	99

EJ Screen also identifies the entire target area as being “medically underserved”. In addition to this data from EJ Screen, the target area (along with the entire Corridor) is identified in the Climate and Economic Justice Screening Tool (CEJST) as a disadvantaged community in four categories. These statistics are troubling, have been exacerbated by government actions such as historic red-lining of Black communities, and have real-life impacts to residents in the target area, as is made plain by the socioeconomic and health conditions described in the prior sections. However, redevelopment at 2900 W. Center Street has the potential to counteract these EJ forces by not only providing clients with 2-3 days' worth of food, but also working with community partners to combat factors that contribute to poverty and food insecurity, which will improve the physical health and the socioeconomic health of area residents. Over 20 years ago, EPA Region 5 worked with the City of Milwaukee to further the redevelopment of the Corridor by naming it an EJ Showcase Community. While this EJ Showcase Communities effort achieved real results, there are still significant environmental justice issues that need to be addressed.

(b) Advancing Environmental Justice (5 pts): The reuse strategy of increasing supportive services and food pantry operations at 2900 W. Center Street will advance environmental justice and will not displace residents or business in the target area. Combating hunger through the creation of the Community Resource Center and Food Pantry will address environmental justice by mitigating the environmental impacts of food insecurity, by ensuring access to nutritious food for target area residents that have been disproportionately affected by environmental hazards, thus mitigating the health impacts of environmental injustices. While food pantries can provide immediate relief, they often do not address the underlying systemic issues that contribute to food insecurity, such as poverty and income inequality. The new Community Resource Center and Food Pantry will actively engage with the target area residents they serve to address the root causes of food insecurity, by providing nutrition education and advocating for environmental justice. Beyond immediate hunger relief, community partners will offer job training, financial literacy programs, and access to social services, empowering individuals with skills and knowledge for long-term stability. Improved financial literacy and job training will lead to higher employment rates and better wages for community members, increasing economic activity in the community. Providing comprehensive social support services will reduce crime rates and healthcare costs associated with poverty, benefiting the target area and our broader Milwaukee community.

2.b Community Engagement

2.b.i Project Involvement (5 pts) and 2.b.ii Project Roles (5 pts): All of the City plans described earlier had a foundation in meaningful stakeholder engagement, and RACM staff will continue these engagement efforts going forward. Additionally, the following community partners will offer job training, financial literacy programs, and access to social services, empowering individuals with skills and knowledge for long-term stability. The Jewish Community Pantry is finalizing their partnership agreements and will have those in place prior to redevelopment. The Pantry has provided the following information regarding the involvement and roles of their selected community partners.

Jewish Community Pantry (Pantry) is the lead partner on this transformative project. Since 1976, their mission has remained consistent: to provide emergency food to Milwaukeeans in crisis; to connect clients to community resources; and to increase awareness of hunger in Milwaukee. The Pantry will seize on the opportunity to construct a facility that continues to address emergency food needs, as well as provide residents much needed services and support, on a permanent, year-round basis. Again, beyond immediate hunger relief, the following community partners will offer job training, financial literacy programs, and access to social services, empowering individuals with skills and knowledge for long-term stability. (Jess Vroman, Senior Director, Security and Facilities, 414-967-8170, JVroman@jccmilwaukee.org)

Community Advocacy Group – The first community advocacy group is a diverse group of residents determined to move forward toward a healthy and sustainable community. The group will work in partnership with the residents, not for or to them. This will create a community in action, working to ensure that the neighborhood is an inclusive, vibrant community of choice, made up of families and partners building toward the betterment of the neighborhood. This group will have space at the new facility and be a front and center resource for the guests of the pantry, supporting the empowerment of the community and support revitalizing the neighborhood.

Community Advocacy Group – The second community advocacy group's mission is to create a neighborhood where residents are safe, connected to each other, participate in community and civic life, have access to educational and economic opportunities, and celebrate diversity and culture. The group will have space at the new facility and support neighborhood investment and revitalization by engaging residents, training leaders and building bridges with partners, stakeholders, and government officials. By meeting the guests where they are, they will be able to better support their mission.

Health Care Provider – This health care provider will have space at the new facility and will advance the health of the people of the diverse communities they serve through exceptional care enhanced by innovation and discovery. They will provide health care services to residents of the target area, meeting them where they are. The provider will be able to talk to guests at the pantry about how they can help improve their overall health and well-being, not just pushing medical care.

2.b.iii Incorporating Community Input (5 pts): A Community Relations Plan (CRP) will be prepared that will serve as the framework for community involvement. The CRP will address the cleanup process with added emphasis on seeking out and considering concerns that local residents may have with regard to health, safety, and community disruption potentially posed by the proposed cleanup activities, as well as address and incorporate what change the community members ultimately would like to see at the project site. If the RACM receives this cleanup grant, staff and the project team will work with our community partners to connect with interested citizens and community groups at up to three community meetings during the cleanup planning and cleanup, with the option of in-person or virtual attendance through an online meeting platform. The RACM will use local newspapers, social media outlets, and aldermanic and community group newsletters to provide information about cleanup plans. As necessary, these notices will be provided in English, Spanish, and Hmong. Attachment G includes documentation of community notification, including a copy of the ad in the Daily Reporter. Attachment H includes the meeting minutes.

3.a Proposed Cleanup Plan (10 pts)

As summarized in the ABCA included in Attachment F, RACM considered four remedial options for the 2900 W. Center Street site. The proposed redevelopment plan includes partial building demolition and razing a dock area. New construction will include a 7,000 square-foot building addition to the east of the Pantry, 12,000 square-foot building to the southwest of the Pantry, and construction of an approximate 37,500 square-foot parking lot. Management of impacted soil will be required to facilitate construction for building foundations, footings, and utilities. Contaminated media to be addressed is associated with contamination that has resulted from a release from former underground storage tanks and chemicals used at the site as part of the former industrial operations. Approximately 39 tons of impacted soil was removed from the site; however, concerns of damage to the existing building limited the excavation, which resulted in contamination remaining adjacent to the building. Following the tank and soil removal, further investigation identified soil impacts of petroleum constituents, various chlorinated volatile organic compounds (VOCs) such as tetrachloroethylene (PCE) trichloroethylene (TCE) and methylene chloride. Current soil impacts exceed Wisconsin residual contaminant levels (RCLs), with the highest concentrations identified on the southwestern portion of the subject property.

Based on the project plans to redevelop the site as the Community Resource Center and Food Pantry, excavation of contaminated soil and off-site disposal, and installation of institutional and engineering controls is the preferred method of remediation. Excavation of contaminated soil and off-site disposal will include a soil volume of approximately 7,400 tons based on the removal of up to 2 feet under the footprint of the two proposed buildings and parking lot, and a depth of 5 feet for building footings. The soil proposed for off-site disposal is non-hazardous and may be disposed of at a local Subtitle D licensed landfill. An engineered cap will be installed that will consist of the construction of an approximate 37,500 square-foot parking lot. The WDNR will require the proposed parking lot to serve as a barrier cap to prevent direct contact with the underlying impacted soil. The intent is to partially fund the excavation of contaminated soil and off-site disposal with the EPA grant, and fund the remainder of the soil management and parking lot construction with leveraged funds. In the event that the volume of soil for disposal can be reduced through negotiations with the WDNR, thereby reducing the cost of excavation and disposal, the EPA cleanup grant will also be used for the parking lot construction, which is why both remediation tasks are presented in this section of the application.

A Remedial Action Plan (RAP) will be developed for the site and submitted to the WDNR for review and approval to ensure that cleanup activities are successful and in compliance with the state cleanup authority. The RAP will incorporate Wisconsin and EPA guidelines for Green and Sustainable Remediation. The RACM and their contractors will follow the ASTM Standard Guide to Greener Cleanups by evaluating key aspects, such as minimizing total energy use and maximizing use of renewable energy; minimizing air pollutants and greenhouse gas emissions; minimizing water use and impacts to water resources; and evaluating ways to reduce, reuse, and recycle materials and waste.

3.b Description of Tasks/Activities and Outputs (25 pts)

Project Implementation (10 pts); Project Schedule (5 pts); Task/Activity Lead (5 pts); Outputs (5 pts):

Task 1: Community Engagement
<i>i. Implementation:</i> This task will involve regular meetings and correspondence with project partners; formation of a Project Committee, up to 3 community meetings with virtual options, and ongoing communication through social media, newsletters, and other methods identified as effective outreach methods by the Project Committee.

<i>ii. Schedule:</i> Community engagement is anticipated to occur throughout the 4-year life of the grant, with an emphasis on meeting during the cleanup planning and cleanup during Years 1 and 2.
<i>iii. Lead:</i> The Project Committee will lead the community engagement efforts. This group includes RACM, but as a group, has better on-the-ground knowledge on best practices for reaching the community.
<i>iv. Outputs:</i> a) meeting agendas, notes, sign-in sheets; b) social media posts; c) Project Committee communications
Task 2: Cleanup Planning
<i>i. Implementation:</i> Cleanup planning includes staff time to work with a consultant to prepare the remedial action plan (RAP) and cap modification request, design all elements of the cleanup activities, prepare the disposal profiles for the impacted soil, and update/finalize the ABCA.
<i>ii. Schedule:</i> Cleanup planning is expected to be completed during the first six months of Year 1 of the grant period.
<i>iii. Lead:</i> RACM will coordinate work with the environmental consultant and review all reports.
<i>iv. Outputs:</i> a) revised ABCA; b) RAP; c) cap modification request
Task 3: Site Cleanup
<i>i. Implementation:</i> This task includes excavation and disposal of contaminated soil, and installation of a paved parking lot that will serve as the engineered barrier over impacted soil being managed onsite.
<i>ii. Schedule:</i> Site cleanup may be conducted in phases, and is expected to be completed in Years 2 and 3.
<i>iii. Lead:</i> RACM to coordinate work with the environmental consultant and review all documents. Consultant will complete a health and safety plan (HASP) and provide oversight during the site cleanup.
<i>iv. Outputs:</i> a) HASP; b) 7,400 tons contaminated material hauled off-site for disposal; c) 37,500 sf of engineered cap to serve as parking for the Community Resource Center and Food Pantry.
Task 4: Cleanup Oversight and Grant Management
<i>i. Implementation:</i> This task includes: 1) quarterly progress reporting; 2) annual disadvantaged business enterprise (DBE) reporting; 3) financial reporting; 4) Property Profile Form submission and updates in the EPA Assessment, Cleanup and Redevelopment Exchange System (ACRES); 5) preparation of a final closeout report; and 6) expenses associated with grantee attendance at one brownfield (BF) training conferences.
<i>ii. Schedule:</i> Quarterly progress reports (QPRs) and financial reports will be submitted by Jan 30th, Apr 30th, Jul 30th, and Oct 30th. Annual DBE reports will be submitted by Oct 30th each year. ACRES will be updated upon completion of key outputs or other milestones. Final report will be submitted within 90 days of the grant ending.
<i>iii. Lead:</i> RACM staff will conduct all Cooperative Agreement Oversight.
<i>iv. Outputs:</i> a) 16 QPRs; b) 16 financial reports; c) 4 DBE reports; d) ACRES updates; e) 1 final closeout report; f) attendance at 1 brownfield conferences.

3.c Cost Estimates (15 pts)

Budget Categories (Direct Costs)	Project Tasks				
	Community Engagement	Cleanup Planning	Site Cleanup	Cleanup Oversight and Grant Management	Total
Personnel	\$4,000	\$1,000		\$5,000	\$10,000
Fringe Benefits	\$4,000	\$1,000		\$5,000	\$10,000
Travel				\$5,000	\$5,000
Contractual			\$475,000		\$475,000
Total Budget	\$8,000	\$2,000	\$475,000	\$15,000	\$500,000

The following sections describe how cost estimates were derived. Costs that are bolded are totals that carry into the cost table above. Costs that are not bolded are sub-totals that help make up a bolded total.

Community Engagement costs assumed 40 staff hours at \$50/hour (salary + fringe) per year over the course of the 4-year grant period. This equates to an estimated hour per week for the RACM project manager (0.8 hrs/wk x 50 wks/yr x 4 yrs x \$50/hr = **\$8,000**)

Cleanup Planning: Staff costs assume project manager would spend 40 hrs over the course of the first year. (40 hrs x 1 yr x \$50/hr = **\$2,000**)

Site Cleanup: These costs were developed based unit costs from recent projects. As explained in section 3.a, the intent is to partially fund the excavation of contaminated soil and off-site disposal with the EPA grant, and fund the remainder of the soil management and parking lot construction with leveraged funds. In the event that the volume of soil for disposal can be reduced through negotiations with the WDNR, thereby reducing the cost of excavation and disposal, the EPA cleanup grant will also be used for the parking lot construction, which will serve as a cap over contamination left on site, which is why both remediation tasks are presented in this section of the application.

- Excavation and disposal of contaminated soil (7,400 tons) = \$555,000 (**\$475,000 funded by the EPA Cleanup Grant**)
 - Excavation/Loading: 7,400 tons x \$7/ton = \$51,800
 - Transport: 7,400 tons x \$8/ton = \$59,200
 - Landfill disposal: 7,400 tons x \$25/ton = \$185,000
 - Import and place 1-inch clear stone: 7,400 tons x \$35/ton = \$259,000
- Engineered Barrier = \$375,000
 - Parking lot cap (3 inches): 37,500 sf x \$10 sq/ft = \$375,000 (Eligible costs if needed. See explanation in this section.)

Cleanup Oversight and Grant Management will be performed entirely by RACM staff. Costs were estimated by assuming 50 staff hrs at \$50/hr (salary + fringe) per year over the course of the 4-yr grant period. This equates to an estimated one hr/wk for the RACM project manager. (1 hr/wk x 50 wks/yr x 4 yrs x \$50/hr = **\$10,000**). Travel costs of **\$5,000** are budgeted for two RACM staff to attend one EPA Brownfield Conference. Costs are estimate at \$2,500/person/conference based other recent brownfield conferences.

3.d Plan to Measure and Evaluate Environmental Progress and Results (5 pts): The activities to be funded under this grant will support EPA's FY 2022-2026 Strategic Plan by cleaning up and restoring land for productive uses and healthy communities, and will help safeguard and revitalize the community by providing emergency food to Milwaukeeans in crisis. Remediating VOC impacted soil at the site will create a cleaner, healthier environment, and will also revitalize a brownfield site by putting it back into productive use as the Community Resource Center and Food Pantry

RACM is diligent about measuring the outputs and outcomes of brownfield redevelopment projects and their impact on the City. The grant output categories listed earlier will be tracked and measured on an ongoing basis. Program outcomes will also be tracked and measured, including number of jobs created, square-footage of community space created, and funding leveraged. Both outputs and outcomes will be regularly communicated to RACM's EPA Project Officer via ACRES and routine phone and email communication. The Project Manager will compare progress periodically against the workplan and take corrective actions if needed.

4.a Programmatic Capability (15 pts)

Organizational Structure (5 pts); Description of Key Staff (5 pts); Acquiring Additional Resources (5 pts)

The RACM has the necessary systems, processes and procedures in place to complete all technical, administrative and financial components of the EPA grant as demonstrated by the successful completion of similar brownfield grants as noted in the following section. Mathew Reimer, Senior Environmental Project Coordinator, will be the Project Manager for this grant. Mr. Reimer has a Master's degree in Environmental Management and 20 years of experience working on brownfield projects. Additional RACM staff Tory Kress, Senior Environmental Project Engineer, has a Master's degree in urban and regional planning and 24 years of experience working on brownfield projects. Ms. Kress will serve as the Alternate Project Manager in the event Mr. Reimer is no longer in his current position with RACM. Mr. Reimer and Ms. Kress have a tremendous depth of experience in the management of environmental projects. RACM works to retain staff by providing competitive salary and benefits programs, however, in the event that the environmental team experiences turnover, the group would seek to assign that person's duties to other team members as described above. RACM would seek to fill the vacant position via traditional job posting methods and word-of-mouth communication.

Mr. Reimer and Ms. Kress are very experienced in the management of EPA Brownfield Grants, including workplan development, reporting, and closeout protocols. Mr. Reimer will develop a realistic workplan and schedule for the project. Quarterly reporting will continue to be timely, as it has been in the past, and will reflect on the reasons for any deviations from the original workplan. At the time each quarterly report is submitted or when major project milestones are achieved, environmental staff will update property profiles directly into the ACRES system. On an annual basis (or schedule otherwise set by EPA), staff will compile and submit the MBE and WBE reports. Mr. Reimer and other project team members will work closely with the Accounting

Department to address the annual financial reporting and ensure timely submission to EPA, as well as to complete all required grant closeout documentation.

Dave Misky is the Assistant Executive Director of RACM. Mr. Misky supervises the RACM brownfield team, oversees the real estate operations of the City of Milwaukee, and his leadership in Brownfield development has put hundreds of properties back into productive use. In his role, he managed the \$28M revitalization of the Menomonee Valley Industrial Center, an award-winning 133-acre project where the most visible brownfield in the State of Wisconsin was turned into a successful industrial and community park, creating thousands of new jobs for area residents. His technical expertise will provide critical guidance and support for project staff.

RACM currently has a Master Services Agreement with four different consulting firms to contract grant eligible activities. The consultants are procured following federal procurement regulations and are contracted as needed for individual projects. RACM retains the environmental consultants to assess brownfield properties, prepare cleanup plans and conduct cleanups at redevelopment sites. Mr. Reimer, Ms. Kress, and Mr. Misky have worked as consultants previously and work very closely with the contracted consultants to review data and make decisions on the best route to cleanup and eventual redevelopment. RACM staff and consultants will also work closely with WDNR staff in overseeing the site cleanup work.

4.b Past Performance and Accomplishments

4.b.i Currently Has or Previously Received an EPA Brownfields Grant

4.b.i.1 Accomplishments (5 pts): RACM and the City of Milwaukee are fortunate to have received nine Revolving Loan Fund grants, nine Assessment Grants, a Multipurpose Grant, and fifteen Cleanup Grants (for 37 sites) since 2002 and has a successful track record in achieving its planned outputs and outcomes, as well as recording process in the ACRES tracking system. Progress on the three most recent grants are described below.

BF-00E03557 – FY23 Assessment Grant: Approximately 25% of the Assessment Grant funds have been expended to date. Outputs include the following: three Phase II site investigations have been initiated and are on-going, with additional sites in the pipeline. QAPPs are established and updated annually for each of RACM's MSA consultants. These outputs and outcomes are currently accurately reflected in ACRES.

4B-00E03575 – FY23 Cleanup Grant for 3940 North 35th Street: This cleanup project will conduct remediation and support pre-development activities for a 13.7-acres brownfield site that is the former location of lagoons that were used for the disposal of an industrial waste solution that contained iron and sulfuric acid. Current activities include repairs to on-site storm sewers, groundwater monitoring, site reuse planning, and ongoing engagement with community partners.

4B-00E03585-1 – FY23/24 Supplemental RLF Grant: This RLF grant award provides funding for RACM to recapitalize its revolving loan fund program from which to make loans and subgrants to cleanup brownfield sites. RACM has a well-established RLF program and has made more than 20 loans since the program began. \$3M in supplemental RLF funding was awarded for FY23 and an additional \$3.5M was awarded in FY24. Of the total \$6.5M in the new cooperative agreement, three loans totaling \$2.75M have been executed, which will also fully draw down and close out the remaining approximately \$224,000 from an older RLF grant. One additional loan is currently in the pipeline.

4.b.i.2 Compliance with Grant Requirements (10 pts): As outlined in Section 4.a, RACM is diligent about timely submittals of reports, including quarterly reports, technical reports, financial reports, and MBE/WBE reports. RACM has maintained compliance with workplans, schedules, and grant terms and conditions throughout the grant periods. RACM closely monitors the outputs and outcomes of grants by reporting progress regularly in quarterly reports submitted to the EPA Project Officer as well as updating each site on ACRES.

For each of the three most recent grants below, RACM has made steady progress towards achieving the expected results of the grants and is eager to continue its past success with a new cleanup grant.

BF-00E03557 – FY23 Assessment Grant: (10/1/23 – 9/30/27): Grant funds have been 25% expended and will continue to be drawn down in order to meet the grant timeframe. All grant funds are anticipated to be expended within the grant period.

4B-00E03575 – FY23 Cleanup Grant for 3940 North 35th Street: (10/1/23 – 9/30/27): The cleanup project has been initiated and will continue through 2026. All grant funds are anticipated to be expended within the grant period.

4B-00E03585-1 – FY23/24 Supplemental RLF Grant (10/1/23 – 9/30/29): Three loans totaling have been executed and one additional loan is currently in the pipeline. All grant funds are anticipated to be expended within the grant period.

CLEANUP GRANT – 2900 W. CENTER STREET

III.B THRESHOLD CRITERIA FOR CLEANUP GRANTS

1. Applicant Eligibility

(a) The Redevelopment Authority of the City of Milwaukee (RACM) is the applicant. RACM is a Redevelopment Agency sanctioned by Wisconsin Statutes Section 66.1333 (3) and (5) and a land clearance authority operating under supervision of the City of Milwaukee (Common Council file 58-902). See Attachment C for documentation.

(b) RACM is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

The proposed site – 2900 W. Center Street – has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

RACM is a current Brownfields Multipurpose Grant recipient. The cooperative agreement number is BF-00E02748 and the award amount was \$800,000. RACM can demonstrate it has received payment from EPA and drawn down funds have been disbursed for at least 70.00% of the funding by October 1, 2024. Specifically, \$786,117.10, or **98.26%**, has been drawn down, leaving a remaining balance of \$13,882.90, or 1.74%. See Attachment D for documentation.

4. Site Ownership

The site – 2900 W. Center Street – is currently owned by the City of Milwaukee.

5. Basic Site Information

(a) The name of the site is 2900 W. Center Street.

(b) The address of the site is 2900 W. Center Street, Milwaukee, Wisconsin 53210

6. Status and History of Contamination

(a) This site is contaminated with hazardous substances.

(b) 2900 W. Center Street was historically occupied by a creamery, a laundry business, a printing company, offices, taverns, a barber shop, an adhesives company, and residential properties. The adhesives company utilized the site to manufacture hot melt adhesives until suspension of operations in 2003. The manufacturing process included combining wax, resins, and polymers in mixing vessels at elevated temperatures. The site is currently partially occupied by the Jewish Community Pantry, which provides emergency food to individuals and families in crisis throughout the greater Milwaukee community.

(c) The primary environmental concerns at this time is the presence of hazardous substances including chlorinated volatile organic compounds and VOCs.

(d) The subject site likely became contaminated as a result of the past uses mentioned above. Other contamination may have resulted from spills and other releases from decades of general industrial use. Also, a release was identified on site when two 300-gallon underground storage tanks (USTs) were removed in 1995. Additionally, based on the soil VOC concentrations, residual impacts are still present under the building, and based on the sub-slab vapor concentrations detected greater than the State standards, there is threat of vapor intrusion into the building.

7. Brownfields Site Definition

(a) 2900 W. Center Street is not listed or proposed for listing on the National Priorities List;

(b) The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and

(c) The site is not subject to the jurisdiction, custody, or control of the United States government.

8. Environmental Assessment Required for Cleanup Grant Applications

An ASTM E1903-19 equivalent Phase II report entitled “Phase II Environmental Site Assessment Report: 2900 W. Center Street, Milwaukee, WI” was completed by Sigma on October 10, 2023.

9. Site Characterization

(b) RACM is an applicant other than a State or Tribal Environmental Authority that is proposing a site that is eligible to be enrolled in a voluntary response program. See Attachment E for a current letter from the appropriate State Environmental Authority that:

(i) Affirms that the site is eligible to be enrolled in the state voluntary response program;

(ii) Indicates whether the site is enrolled, or intends to be enrolled in the state voluntary response program; and

(iii) Indicates that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site.

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to this site.

11. Sites Requiring a Property-Specific Determination

This site does not require a property-specific determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

(a) Property Ownership Eligibility – Hazardous Substances Sites

(i) Exemptions to CERCLA Liability

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government - -

(a) The City of Milwaukee foreclosed on the property due to tax delinquency. (b) The property was foreclosed on November 26, 2019. (c) All disposal of hazardous substances at the site occurred before the City of Milwaukee acquired the property. (d) The City of Milwaukee has not caused or contributed to any release of hazardous substances at the site. (e) The City of Milwaukee has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(iv) Sites with Hazardous Building Material that is not Released into the Environment

There has been no release and that there is no threat of release of the hazardous substance(s) from building materials into the outdoor environment based on the site conditions.

13. Cleanup Authority and Oversight Structure

(a) RACM staff will manage the site cleanup on a day-to-day basis and the WDNR, the regulatory agency with oversight of remediation activities, will ensure the cleanup is protective of human health and the environment. Assignment of a BRRTS number by the WDNR has been completed, therefore the site is already subject to the requirements of the traditional cleanup program. The traditional cleanup program is outlined in Section 292.11 (3) Wisconsin Statutes (hazardous substances spill law) and Wisconsin Administrative Code chapters NR 700 through NR 749 (which establish requirements for emergency and interim actions, public information,

WDNR, RACM, and consultant staff are all highly qualified to contribute to oversight of this project. RACM has a tremendous depth of collective experience in environmental testing and cleanup, and is experienced in working with environmental contractors to develop QAPPs, Work Plans, Sampling Plans, and Health and Safety Plans. Please also see Section 4.a “Programmatic Capability” of the proposal narrative for additional information on staff qualifications. The consultants were procured through a competitive process that followed federal procurement regulations and are contracted as needed for individual projects. See section 15 below for additional information on the procurement process.

(b) Access to neighboring properties will not be needed.

14. Community Notification

14.a Draft Analysis of Brownfield Cleanup Alternatives

RACM prepared a draft Analysis of Brownfield Cleanup Alternatives (ABCA) that summarized the site and contamination issues, cleanup standards, and applicable laws; the cleanup alternatives considered, and the proposed cleanup. The Draft ABCA is included as Attachment F.

14.b Community Notification Ad

RACM published a public notice in the Daily Reporter on October 3, 2024 notifying the public of its intent to apply for an EPA Brownfield Cleanup Grant, of the availability of the grant application including the draft ABCA for review, and of the opportunity to comment on the application and the draft ABCA by submitting written comments via mail or email or by speaking at the public meeting. This notice was published more than two weeks prior to the grant submittal date on November 14, 2024. A copy of the public notice is included as Attachment G.

14.c Public Meeting

The public notice described above informed the public that RACM would be holding a public meeting on October 17, 2024 where the community was welcomed to submit comments orally. The public meeting was held as part of a regularly scheduled RACM Board meeting. This venue was chosen because the board meetings are traditionally better attended than meetings focused only on grant proposals.

Attachment H includes meeting information including (1) the meeting agenda, (2) resolution, (3) the meeting notes, and (4) a participant list for those in attendance during the public hearing for item #1.

14.d Submission of Community Notification Documents

The following documents are included as attachments:

- A copy of the draft ABCA – Attachment F
- A copy of the newspaper ad that demonstrates solicitation for comments at least 14 calendar days before submittal – Attachment G
- The comments received or a summary of comments received – Attachment H
- The applicant's response to those public comments – Attachment H
- Meeting notes or summary from the public meeting – Attachment H
- Meeting sign-in sheet/participant list – Attachment H

15. Contractors and Named Subrecipients

RACM currently has a Master Services Agreement (MSA) with four different consulting firms to conduct environmental activities at sites across the City of Milwaukee. Environmental activities include a wide range of environmental services including Phase I and II ESAs, preparation of cleanup plans, and contracting and oversight of cleanups. Sigma – one of these four companies – has conducted the Phase I and Phase II activities on the site to date, however RACM has not formally selected Sigma to continue work through the RAP and Cleanup phase. The selected consultant, will, however be one of the four consulting firms with which it has MSAs already established. Information on the procurement process follows.

RFP 18623 - Vendor Service Contract for Environmental Contracting and Consulting Services was released February 2, 2022 via the City's Department of Administration – Purchasing Division. The RFP was made available on the City's Contract Opportunities webpage and notifications were sent out via the City's E-Notify system. Responses were due March 3, 2022

via the Bonfire portal system. Eight responses were received. The responses were scored by the review committee according to the criteria in the RFP and four companies were awarded contracts. The consultants were procured following federal procurement regulations and are contracted as needed for individual projects.



November 8, 2024

Lafayette Crump
Executive Director
Redevelopment Authority of the City of Milwaukee
809 North Broadway, 2nd Floor
Milwaukee, WI 53202
Via Email Mail Only to lafayette.crump@milwaukee.gov

**Subject: State Acknowledgement Letter for Redevelopment Authority of the City of Milwaukee
FY25 EPA Brownfield Cleanup Grant**

Dear Lafayette Crump,

The Wisconsin Department of Natural Resources (DNR) acknowledges the application of the Redevelopment Authority of the City of Milwaukee (RACM) for the U.S. Environmental Protection Agency (EPA) brownfield grant identified above.

The DNR is fully committed to a collaborative partnership with the RACM and is able to support your brownfield assessment and remediation efforts in many ways, including:

- The DNR can identify key state and federal contacts for your specific project and coordinate Green Team meetings with individuals in your community to answer questions and discuss local plans, options and best practices.
- The DNR can assist you in identifying and obtaining additional financial assistance from state-managed grant and loan programs.

Obtaining U.S. EPA funding for this grant application is consistent with community needs, is vital to the local economy and will help bring needed improvements to the quality of life for residents. Federal funding will also help initiate cleanup activities, create jobs and leverage local investments in brownfield redevelopment.

FY25 Cleanup Grant: Site(s) Eligibility, Characterization, and Readiness for Remediation

For FY25, EPA requests that certain applicants for cleanup grants submit a letter from the state describing property eligibility and whether there is a sufficient level of site characterization from the environmental site assessment for the remediation work to begin on the property(ies) either as of the date of this letter, or by June 15, 2025, for the remediation work to begin on the property(ies).

- **Eligibility.** This property is undergoing cleanup under Wisconsin's cleanup program and its governing administrative code, Wis. Admin. Code chs. NR 700-799, and statute, Wis. Stat. ch. 292. The state cleanup program is regulatory and nonvoluntary. This property is eligible for the Voluntary Party Liability Exemption (VPLE) program under Wis. Stat. § 292.15 and was previously enrolled in the VPLE program.
- **Site characterization status.** Site characterization is sufficient as of the date of this letter to allow remediation work to begin. In its request, dated October 11, 2024, the applicant stated that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to

begin. The DNR reviewed and approved the reports needed to verify site characterization under the state VPLE program and issued a VPLE certificate of completion January 20, 2005, for this property.

Timeframe. For the property described in the attached request, dated October 11, 2024, the applicant stated that cleanup can begin as soon as U.S. EPA cleanup funds are available, and that reports, including a Remedial Action Plan and Post-Closure Modification request, could be submitted as soon as site redevelopment plans are finalized.

Based on this representation, regulatory timeframes, and review timeframes, the DNR believes site characterization is complete to an extent that allows remediation work to begin at this site.

Sincerely,



Roxanne Chronert, Policy and Program Operations Director
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

Attachment:

Request dated October 11, 2024

cc:

Mathew Reimer, RACM – mathew.reimer@milwaukee.gov

David Hanson, DNR SER – david.hanson@wisconsin.gov

Margaret Brunette, DNR SER – margaret.brunette@wisconsin.gov

Michael Prager, DNR CO – michael.prager@wisconsin.gov