

Narrative Proposal

1. COMMUNITY NEED

a. Targeted Community & Brownfields

Targeted Community Description – Located on the banks of the Mississippi River, Dubuque is Iowa’s oldest city. Dubuque was first established as a fur-trading post and mining community, but later flourished as a manufacturing hub. Railroads connected Dubuque to metropolitan areas across the country in the mid-1800s, which created a population boom as German immigrants moved to the area in search of jobs. At the turn of the 20th Century, Dubuque’s downtown millwork district was the backbone of the regional economy.

The city’s proximity to a major commercial waterway made the area convenient for a variety of industrial uses, including shipbuilding and repair, railroads, bulk petroleum and coal storage operations, food processing, farm machinery production, and lead mining activity. Manufacturing reigned in Dubuque until the mid-1900s. As Dubuque’s retail and industrial sectors moved to the western suburbs or fled completely, the downtown deteriorated and fell into disrepair. With the collapse of the farm economy in the 1980s, the community watched as the Dubuque Packing Company closed up shop, and then as John Deere – then the city’s largest employer – reduced its workforce by about three-quarters of its peak. All told, Dubuque lost 10 percent of its population and had the highest unemployment in the nation.

Over the last 100 years, Dubuque has seen its economy shift from manufacturing along its riverbank to the retail, health care, education, publishing, and financial service sectors. Dubuque now serves as the employment center for the tri-state region of Iowa, Illinois and Wisconsin. Dubuque is currently underway on an ambitious effort to revitalize core downtown neighborhoods, including the Washington Neighborhood. The Washington Neighborhood is a 128-acre, low-income community containing the city’s oldest housing stock. Economic disinvestment in the downtown and job flight to the suburbs significantly impacted the Washington Neighborhood. In 2004, the City launched a campaign to spur economic development and improve residents’ quality of life in the Washington Neighborhood. Restoration efforts include daylighting the buried Bee Branch Creek, creating a linear park and installing green infrastructure to reduce the risk of flood damage to 1,155 properties. In 2012, the City received U.S. Environmental Protection Agency (EPA) Community-Wide Brownfields Assessment funding to characterize properties in the Washington Neighborhood to encourage their reuse. In 2013, Dubuque was honored with an EPA National Award for Smart Growth Achievement for its focused Washington Neighborhood redevelopment activities.

Demographic Information –

	Census Tract 1	Dubuque	Iowa	National
Population	2,842 ¹	58,068 ¹	3,078,116 ¹	314,107,084 ¹
Unemployment	n/a	3.0 ²	3.2% ²	5.0% ²
Poverty Rate	32.1% ¹	14.8% ¹	12.6% ¹	15.6% ¹
Percent Minority	30.7% ¹	9.5% ¹	12.2% ¹	37.2% ¹
Median Household Income	\$23,109 ¹	\$46,806 ¹	\$52,716 ¹	\$53,482 ¹
Per Capita Income	\$17,442 ¹	\$25,148 ¹	\$27,621 ¹	\$28,555 ¹
Women (15-50 years) with Births in the Past 12 Months (per 1,000)	61 ¹	60 ¹	57 ¹	54 ¹
Did Not Graduate High School	21.5% ¹	9.0% ¹	8.7% ¹	13.7% ¹
Under 5 Years Old	7.4% ¹	5.6% ¹	6.4% ¹	6.4% ¹

Households Receive Food Stamps & Supplemental Nutrition Assistance Program Benefits	29.2% ¹	12.7% ¹	11.6% ¹	13.0% ¹
Renter-Occupied Units	87.8% ¹	35.8% ¹	28.2% ¹	35.6% ¹
Disabled	18.0% ¹	13.1% ¹	11.4% ¹	12.3% ¹
No Vehicle Available	30.1% ¹	8.9% ¹	5.7% ¹	9.1% ¹
¹ U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates ² Bureau of Labor Statistics (October 2015)				

Description of Brownfield – Using EPA Brownfields funds, Dubuque assessed a 0.23-acre former scrap yard and recycling facility (operating since 1963) at 501 East 15th Street. The Blum property abuts railroad tracks, another scrap facility, an automotive repair shop, a coal yard, and a corrections facility – all potential brownfields. An on-site inspection conducted during a Phase I Environmental Site Assessment (ESA) observed:

- Leaking batteries and car parts stored on pallets with associated staining on the ground;
- Hydraulic machinery with associated staining in the north building on the property; and
- Stained pavement throughout the site associated with past and present scrap material storage.

A subsequent Phase II ESA (completed in December 2015) identified the following hazardous materials in the soil and groundwater:

- Eleven (11) polycyclic aromatic hydrocarbon (PAH) compounds were detected in the soil above laboratory reporting limits; benzo[a]pyrene was identified at a level above statewide standards;
- Lead and arsenic were identified in the soil at levels above statewide standards;
- Ten (10) PAHs, one (1) volatile organic compound (VOC) and one (1) Resource Conservation and Recovery Act (RCRA) metal were detected above laboratory reporting limits in groundwater samples; benzo[a]pyrene, benzo[b]fluoranthene, dibenz(a,h)anthracene, indeno[1,2,3-cd]pyrene, and tetrachloroethene were detected above protected groundwater statewide standards;
- Benzo[b]fluoranthene, chrysene, tetrachloroethene, and pyrene are sufficiently volatile and sufficiently toxic to present a vapor intrusion risk for slab-on-grade buildings; and
- Asbestos containing material (ACM) was identified on the property.

In addition, low levels of mercury were also detected in the Phase I soil observations. Further mercury sampling should be conducted once demolition of the property’s structures is complete.

Based upon the results of the Phase II ESA, the Blum property is not suitable for future residential, commercial or industrial purposes without remediation of shallow soil. The levels of lead, arsenic and benzo[a]pyrene contamination indicate that the surface material covering the slab indoors will likely need to be managed as hazardous waste, and should be mitigated prior to demolition. The source of tetrachloroethene exceedances in the groundwater samples is unknown and warrants further investigation. ACM abatement is also required before the structure is demolished.

Dubuque acquired the Blum property on December 11, 2015, following All Appropriate Inquiry. The planned reuse is a park facility. On the edge of the Washington Neighborhood, the contaminated site poses significant health risks to nearby residents as well as a threat to aquatic life in the Mississippi River.

Cumulative Environmental Issues – Dubuque residents live among many former and existing manufacturing sites. The impacted Washington Neighborhood is currently host to multiple gas stations, body shops, dry cleaners, metal finishing companies, and fuel yards. Railroad tracks define the eastern edge of the Washington Neighborhood. U.S. 61/151 is a major transportation route that lies just north of the Blum property. Alliant Energy owns and operates the coal-fired Dubuque Generating Station several blocks from the targeted property. The Washington Neighborhood also borders Dubuque’s Historic Millwork District, a 43-acre former industrial area containing over 1 million square feet of warehouse space.

The area is highly monitored by EPA for air pollution, hazardous waste and toxic releases. According to EPA’s Envirofacts system, 178 facilities are regulated in the Dubuque region, including: 51 stationary sources of air pollution; 5 entities in the Hazardous Waste Report; 2 Superfund sites; 28 permitted dischargers of wastewater; 111 hazardous waste handlers; 18 businesses that use chemicals included on the Toxic Releases Inventory; and 3 companies dealing with chemicals such as polychlorinated biphenyls, asbestos and lead-based paint covered by the Toxic Substances Control Act. Dubuque’s air quality is also approaching EPA non-attainment levels. Fine particles (PM 2.5) represent the greatest concern for the region, measuring just under the acceptable standard.

EPA’s EJSCREEN tool shows Washington Neighborhood residents in the 62nd percentile in proximity to Treatment Storage and Disposal Facilities, the 68th percentile in proximity to a major direct water discharger, the 70th percentile in proximity to a Risk Management Plan facility, the 81st percentile for lead paint indicators, the 81st percentile for traffic proximity and volume, and the 95th percentile for proximity to a National Priority List site. In addition, a 2012 American Cancer Society study found an elevated incidence of all cancers in the Dubuque region (476.2 per 100,000).

Environmental contamination also poses a risk to aquatic life in the Mississippi River, including fish, bald eagles, ducks, and other flora and fauna. Cleaning up brownfields near the river will safeguard fish and fowl, and protect vulnerable populations within Dubuque who depend upon the Mississippi River for sustenance.

b. Impacts on Targeted Community – Dubuque seeks EPA funding to address the following health threats at the Blum property:

- **Lead:** Lead interferes with a variety of body processes and is toxic to many organs and tissues, including the heart, bones, intestines, kidneys, and reproductive and nervous systems.
 - *Sensitive populations:* Lead is particularly dangerous to children because their growing bodies absorb more lead than adults and their brains and nervous systems are more sensitive to lead’s effects. Even very low levels of lead in the blood of children can result in permanent damage to the brain and nervous system, leading to behavior and learning problems, hearing problems, slowed growth, and anemia. Ingestion by children can cause seizures, comas and even death. Pregnant women are also highly vulnerable to lead exposure, which can result in miscarriage, reduced fetus growth and premature birth.
- **Arsenic:** The International Agency for Research on Cancer has classified arsenic and arsenic compounds as carcinogenic to humans. Long-term exposure to inorganic arsenic, mainly through drinking of contaminated water, eating of food prepared with this water and eating food irrigated with arsenic-rich water, can lead to chronic arsenic poisoning. Skin lesions and skin cancer are the most characteristic effects.

- *Sensitive populations:* There is some evidence that inhaled or ingested inorganic arsenic can injure pregnant women or their unborn babies.
- **PAHs (including benzo[a]pyrene, benzo[b]fluoranthene, chrysene, dibenz(a,h)anthracene, indeno[1,2,3-cd]pyrene, and pyrene):** Exposure to PAHs may cause harmful health effects. Studies of people show that individuals exposed by breathing or skin contact for long periods to mixtures that contain PAHs and other compounds can also develop cancer.
 - *Sensitive populations:* High prenatal exposure to PAH is associated with lower IQ and childhood asthma. The Center for Children’s Environmental Health states that exposure to PAH pollution during pregnancy is related to adverse birth outcomes, including low birth weight, premature delivery and heart malformations. Cord blood of babies exposed to PAH pollution has been linked to cancer.
- **Tetrachloroethene:** EPA considers tetrachloroethylene “likely to be carcinogenic to humans by all routes of exposure.” Tetrachloroethene exposure may harm the nervous system, liver, kidneys, and reproductive organs. Studies in humans suggest that exposure to tetrachloroethylene may lead to a higher risk of getting bladder cancer, multiple myeloma or non-Hodgkin’s lymphoma.
 - *Sensitive populations:* Tetrachloroethylene may have effects on pregnancy and unborn children.
- **Asbestos:** Studies have shown that asbestos exposure may increase the risk of lung cancer and mesothelioma. Studies also suggest an association between asbestos and gastrointestinal and colorectal cancers, as well as an elevated risk for cancers of the throat, kidney, esophagus, and gallbladder. Asbestos exposure may also increase the risk of asbestosis and other nonmalignant lung and pleural disorders.
 - *Sensitive populations:* Children’s exposure to asbestos is especially concerning because early and long-term exposure increases the risk of developing lung disease and cancer.
- **Mercury:** Exposure to mercury can impair neurological development, as well as damage the gastrointestinal tract, the nervous system and the kidneys.
 - *Sensitive populations:* Children exposed to methylmercury while they are in the womb can have impacts to their cognitive thinking, memory, attention, language, fine motor skills, and visual spatial skills.

Brownfields, along with other identified cumulative environmental issues, disproportionately impact the Washington Neighborhood in Dubuque. Economic and health disparities of area residents are exacerbated by the presence of environmental contamination. The Blum property poses cancer and non-cancer risks to nearby households, including higher concentrations of pregnant women (61 births per 1,000 women) and children under 5 (7.4% of the population) in the Washington Neighborhood. Contaminated sites like the Blum property also create a negative psychological impact on Washington Neighborhood residents. These brownfields cause blight, attract vandalism and crime, and scare away new development.

c. Financial Need

i. Economic Conditions – Dubuque is limited in its ability to clean up the Blum property without EPA assistance. Earlier this year, Dubuque was forced to close a \$2 million operating budget deficit. Among Dubuque’s fiscal challenges are steadily decreasing lease payments from the Dubuque Racing Association, the non-profit license-holder of Mystique Casino; declining property lease revenues; fallout from the state legislature’s property tax reform; the City’s underperforming investment income; and a slow construction season that resulted in lower-than-expected building permit issuances. The

City Council has adopted several cost-saving measures, including cancelling capital projects, the elimination of more than 13 full-time jobs and a continued hiring freeze.

The City has also been forced to spend limited resources recovering from extensive storm and flood damages; the region has received six Presidential Disaster Declarations since 2000. In addition to the traditional concerns that communities across the country are experiencing due to the economic downturn, the City has dealt with costly floods and damages to infrastructure.

ii. Economic Effects of Brownfields – As demonstrated in the chart above, the Washington Neighborhood (Census Tract 1) is economically challenged, and suffers from serious income inequality. Census Tract 1, which is 30.7% minority as compared to 9.5% for the City, experiences much higher poverty rates (32.1%) and significantly lower median household incomes (\$23,109) than Dubuque (14.8%, \$46,806), the State of Iowa (12.6%, \$52,716) and the United States (15.6%, \$53,482). Education levels in Census Tract 1 are lower than the State and national averages; 21.5% of residents in the area have less than a high school degree, compared to 9.0% in Dubuque, 8.7% for Iowa and 13.7% across the country. Transit, walking and means of transportation other than a personal vehicle are also more important to Washington Neighborhood residents in Dubuque. More than 30% of Census Tract 1 workers 16 years and older commute by transit, walking, biking, and other alternative transportation modes, compared to 8.9% citywide.

For years, the adjacent Historic Millwork District had isolated the Washington Neighborhood from downtown, and separated the community from the Mississippi River. Until recently, most job creation and economic activity was occurring on the fringe of the city. A poorly designed transit system also limited access to those employment opportunities, and further segregated the Washington Neighborhood.

Brownfields threaten Dubuque’s livability and its ability to grow sustainably. Contaminated sites are downtown eyesores that thwart smart growth. Blighted properties cripple the local tax base, cause property values to fall and lead to community disinvestment. As new development moves to the outer fringes, the municipal burden to maintain critical infrastructure increases.

Several City-initiated activities have begun to reverse the fortunes of the Washington Neighborhood. First, the City worked with community organizations to open the Crescent Community Health Center in 2006, which provides affordable, quality health care services to Dubuque’s low-income population. Next, moderate-income housing was developed alongside the Center. New economic activity in the North Port area has created increasing job opportunities downtown. In 2011, the City received funding from FTA to redesign bus transit routes to expand transportation options for low-income residents of the Washington Neighborhood. Finally, the City’s effort to daylight the Bee Branch Creek has renewed developer interest in the Washington Neighborhood. EPA Cleanup funding will continue that positive trend and improve quality of life for area residents.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a. Project Description

i. Existing Conditions – Dubuque seeks EPA Brownfields Cleanup funding to remediate the contaminated Blum property at 501 East 15th Street, a former scrap yard and recycling facility. The 0.23 acre parcel, acquired by the City in early December 2015, has been characterized with EPA Brownfields Assessment resources and been found to contain high levels of lead, arsenic and other

pollutants in the soil. Revitalization of downtown and North Dubuque has been identified as a community priority. EPA support will enable the City to clean up the blighted site and create a pocket park for residents of the distressed Washington Neighborhood.

A Phase II ESA (completed in December 2015) identified the following hazardous materials in the soil and groundwater:

- Eleven (11) PAH compounds were detected in the soil above laboratory reporting limits; benzo[a]pyrene was identified at a level above statewide standards;
- Lead and arsenic were identified in the soil at levels above statewide standards;
- Ten (10) PAHs, one (1) VOC and one (1) RCRA metal were detected above laboratory reporting limits in groundwater samples; benzo[a]pyrene, benzo[b]fluoranthene, dibenz(a,h)anthracene, indeno[1,2,3-cd]pyrene, and tetrachloroethene were detected above protected groundwater statewide standards;
- Benzo[b]fluoranthene, chrysene, tetrachloroethene, and pyrene are sufficiently volatile and sufficiently toxic to present a vapor intrusion risk for slab-on-grade buildings; and
- ACM was identified on the property.

Current structures on the property include two (2) two-story buildings and one (1) one-story building. The property also contains an incinerator, hydraulic equipment and piles of scrap metal.

Reuse plans for the subject property include constructing a bike trail, bike pavilion, playground equipment, and public bathroom to serve the adjoining Bee Branch Creek daylighting project. The trail will provide important connectivity to the national Mississippi River Trail.

The creation of open space in the Washington Neighborhood is welcomed by residents, and aligns with local planning efforts. In 2004, the City and the Washington Neighborhood Association initiated the “Washington: *Revitalize!*” improvement program, which led to the creation of the Washington Neighborhood Plan. This Plan addresses both physical improvements to enhance livability, and programs necessary to provide less-advantaged citizens with the capacity to “access the ladder of economic opportunity that leads out of poverty.” Redevelopment of the Blum property into a pocket park supports that vision, and encourages further revitalization of the Washington Neighborhood.

The City will enroll the Blum property into the Iowa Department of Natural Resources’ (IDNR) Land Recycling Program. A qualified environmental professional will oversee the cleanup in conjunction with IDNR. The qualified environmental professional will comply with and submit all required Land Recycling Program documentation. A certified asbestos contractor will complete all mitigation of identified ACM and will comply with all documentation and notification requirements issued by the IDNR Air Quality Bureau. A professional engineer will also develop and review any necessary design and institutional control plans, as needed.

ii. Proposed Cleanup Plan – As described in the attached Analysis of Brownfields Cleanup Alternatives (ABCA), three remediation approaches were considered:

- **Alternative #1:** No action.
- **Alternative #2:** Capping after the completion of structure removal (including ACM mitigation and lead-impacted surface material and debris) is an effective way to prevent recreational receptors that could come into direct contact with contaminated soils, building material and debris currently located on the subject property, if the cap is maintained. However, mitigation

of ACM and contaminated debris followed by capping is not effective in accomplishing the redevelopment goals for this site which include recreational space; nor does it control exposures, such as direct contact risks for construction and utility workers who would be on-site for redevelopment. In order to accommodate these risks and allow access to the area where contaminated soil has been identified, that soil would require remediation prior to development. In addition, an institutional control (environmental covenant) would need to be recorded on the deed to prevent any uncontrolled digging or subsurface work (in order to meet the objective of eliminating the direct contact pathway of exposure). This institutional control would limit access to the site for authorized construction and properly trained utility workers to handle potentially contaminated soils.

- **Alternative #3:** Excavation with off-site disposal after the completion of structure removal (including ACM mitigation and lead-impacted surface material and debris) is an effective way to eliminate risk at the subject property for all receptors and pathways while still allowing access to the subsurface for future development, as contamination will be removed and the exposure pathways will no longer exist. An environmental covenant could be included for any identified contamination beyond three (3) feet below ground surface outside of designated utility trench areas, if such contamination is identified.

Alternative #3 was selected as the most practical to implement for the following reasons:

- Because redevelopment is planned for the site, selection of Alternative #1 is unacceptable.
- While Alternative #2 is less expensive than excavating soils and disposing of them off-site, that option would restrict access to subsurface material, preventing the installation of new utilities and footings for structures in future site development.
- As outlined in Alternative #3, the removal of the impacted soil severs exposure pathways and limits restrictions to development or utility access in the future on the subject property.

b. Task Description & Budget Table

Task Descriptions –

- **Task 1 – Cooperative Agreement Oversight:** The project will involve management of the cooperative agreement. The project manager, who will serve as a liaison with EPA Region 7 and be responsible for assuring compliance with grant requirements, will serve at no burden to project funds, as no reimbursement for personnel is requested.
- **Task 2 – Community Outreach & Involvement:** A key project component is continued community engagement. In 2013, Dubuque received EPA Brownfields Assessment funding to begin characterizing contamination in the Washington Neighborhood, and to take reuse planning to the next level. The City established a Steering Committee and project teams (including area residents, business leaders and non-profit officials) to lead that project. Dubuque will continue to interact with the Steering Committee and project teams on the cleanup of the Blum property. In addition, three public meeting will be conducted throughout the project period to share information, collect feedback and describe next steps. All Community Outreach & Involvement costs will be borne by the City.
- **Task 3 – Brownfield Cleanup Activities:** Cleanup activities involved with Alternative #3 include procuring environmental consultants, enrollment in the Iowa Land Recycling Program, ACM abatement, structure removal, and excavation with off-site disposal. This approach has an estimated total cost of \$250,000. Major costs include transportation and disposal of regulated soils and post-remediation groundwater monitoring. These activities will be conducted by qualified

environmental professionals. City staff will manage the cleanup process at no burden to the grant funds.

Cost share includes \$50,000 of Task 3’s cleanup, and all personnel time devoted to Task 1, 2 and 3.

Specific outputs for the project include:

- Engagement with brownfields Steering Committee and project teams;
- Three (3) public meetings to share information, collect feedback and describe next steps;
- Finalize ABCA and cleanup plan for Blum property; and
- Letter of cleanup completion from IDNR.

Project outcomes include improved health and welfare in the Washington Neighborhood, the creation of green space and the promotion of further community revitalization. Progress will be tracked during the project and reported to EPA through the Assessment, Cleanup and Redevelopment Exchange System (ACRES).

Budget Table (Hazardous Substances) –

Category (programmatic costs only)	Project Tasks			
	Task 1: Cooperative Agreement Oversight	Task 2: Community Outreach & Involvement	Task 3: Brownfields Cleanup Activities	TOTAL
Personnel	\$2,500	\$10,000	\$0	\$12,500
Fringe Benefits	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$0
Equipment	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0
Contractual	\$0	\$0	\$250,000	\$250,000
SUBTOTAL	\$2,500	\$10,000	\$250,000	\$262,500
Federal Request	\$0	\$0	\$200,000	\$200,000
Cost Share	\$2,500	\$10,000	\$50,000	\$62,500
TOTAL	\$2,500	\$10,000	\$250,000	\$262,500

c. **Ability to Leverage** – The City has extensive experience leveraging federal dollars with additional public and private resources. By way of example, EPA’s \$400,000 investment of Assessment and Cleanup grants in Dubuque’s North Port revitalization was leveraged with more than \$400 million in other federal and state dollars, including funding from the Economic Development Administration (EDA), U.S. Department of Transportation (DOT), U.S. Department of Housing and Urban Development (HUD), State of Iowa, and investment capital. Dubuque has already begun to secure funding commitments to support Washington Neighborhood revitalization. To date, the following federal and state resources have been committed:

- In 2013, Dubuque received a \$400,000 EPA Brownfields Assessment grant to focus on contaminated sites in the Washington Neighborhood. These resources were used to conduct Phase I and Phase II ESAs on the Blum property.
- In 2013, Dubuque’s Bee Branch project was awarded \$98.5 million from the Iowa Flood Mitigation Board in the form of state sales tax increment financing spread over the next 20

years. When combined with other state and federal grants and local donations, the City has received over \$127 million to help daylight a buried creek to protect 1,155 properties in the Washington Neighborhood from flooding.

- Dubuque received a \$5.6 million DOT TIGER grant in 2010 and a \$600,000 Federal Highway Administration (FHWA) Transportation, Community and System Preservation grant in 2012 to develop Complete Streets in the adjacent Historic Millwork District. This area's revitalization provides job opportunities for Washington Neighborhood residents.
- Dubuque was awarded a Federal Transit Administration (FTA) State of Good Repair grant in 2010 to purchase a fleet of new clean diesel buses that will operate within the project area. The City also received an \$8 million FTA State of Good Repair grant in 2011 to construct a new intermodal facility that serves the Washington Neighborhood. More than 30% of residents in the area do not own a vehicle.

Dubuque is currently working with IDNR and EPA Region 7 to pursue resources and support for further brownfields efforts. The City will also work with local non-profits and community colleges to pursue EPA Environmental Workforce Development and Job Training resources in 2016 to provide opportunities for residents in area neighborhoods, including Dubuque's diverse and low-income populations, to develop skills in the environmental field. The City will also pursue additional EDA, HUD, DOT and state funding opportunities to support infrastructure and housing development in the Washington Neighborhood.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Plan for Involving Targeted Community & Other Stakeholders / Communicating Progress –

Dubuque recognizes the role of community engagement in project success. Representatives from the Washington Neighborhood Development Corporation, Greater Dubuque Development Corporation, Community Foundation of Greater Dubuque, East Central Intergovernmental Association, and Dubuque Area Chamber of Commerce are already participating on the established brownfields Steering Committee and project teams, which will help guide the cleanup of the Blum property. Staff will meet regularly with this group (initially and at least quarterly thereafter). The partners will also help engage residents and businesses.

The Community Engagement Team, formed following the 2013 EPA Brownfields Assessment award, will continue to develop and implement strategies to enhance public involvement. The Community Engagement Team will help organize and host a series of three (3) public meetings during the project timeframe. Local outreach activities will target residents of the Washington Neighborhood, particularly households with sensitive populations (*e.g.*, pregnant women and children). The purpose of this engagement is to share information, collect feedback and describe next steps on the Blum cleanup. Input will be also gathered to support reuse of the property as public space. Outside experts, including personnel from the City's Health Services Department and Mel Pins, Iowa's Brownfield Redevelopment Program manager, will be invited to participate. All resident concerns will be recorded and answered. Engagement activities will occur at convenient times, be centrally located and provide child care to maximize public involvement.

Online tools will also be used to send and receive information. Web sites and social media will describe brownfield cleanup efforts, promote engagement opportunities and showcase opportunities for community input.

Throughout the project, Dubuque will communicate monthly with the community through neighborhood gatherings, church groups, speaker’s bureaus, newsletter mailings, web sites, social media, and other communication vehicles. The City’s web site will be a primary source of information. All written outreach materials will be made available in English and Spanish. The proposed outreach tools are appropriate for the community, and Dubuque has used these communications methods with previous success.

b. Partnership with Government Agencies – Dubuque has previous experience working with IDNR on brownfields. Mel Pins, Iowa’s Brownfield Redevelopment Program manager, has been integrally involved in the City’s EPA Assessment activities. Mel’s role will be to provide technical assistance, share best practices and review cleanup plans. The City will enroll the Blum property into IDNR’s Land Recycling Program. A qualified environmental professional will oversee the cleanup in conjunction with IDNR, and comply with and submit all required Land Recycling Program documentation. Dubuque will also explore opportunities to tap into additional state brownfields resources.

Dubuque’s brownfields team also works closely with the City’s Health Services Department and the Iowa Department of Public Health. Health officials from the City and State will help coordinate efforts to communicate the health risks associated with the Blum property. Specific roles for health professionals will be to provide technical assistance, share lessons learned, identify sensitive populations in community, and ensure that cleanup approaches reduce risks to human health.

c. Partnerships with Community Organizations – Dubuque is engaging with the following community-based organization to conduct this project:

Community Organization	Brief Description	Project Roles & Commitments
Washington Neighborhood Development Corporation	A non-profit corporation founded in 2009 to promote revitalization in the Washington Neighborhood. Initiatives include forming a business owners association of storefront businesses in the upper Central Avenue corridor, establishing a welcoming center and a neighborhood web site/information exchange, and creating a marketing theme for the neighborhood to attract home buyers and new business investment.	Participating on the brownfields Steering Committee and project teams. Also working with the City to reach out to local businesses, lenders and community residents to ensure that brownfields cleanup benefits businesses and residents in this low- and moderate-income neighborhood.
Greater Dubuque Development Corporation	A non-profit economic development organization focused on business retention and expansion, workforce development and new business recruitment. The Corporation has provided important leadership in all major City initiatives.	Participating on the brownfields Steering Committee and project teams. Also working with the City to reach out to developers and financial institutions to make sure they are involved in leveraging resources in the target areas.

Community Foundation of Greater Dubuque	A tax-exempt public charity that plays a major role in convening community leaders and making sure the public is involved and supports major initiatives.	Participating on the brownfields Steering Committee and project teams. Also working with the City to ensure that the community is engaged in brownfields reuse planning. The Foundation will also explore opportunities to leverage charitable resources for the project.
East Central Intergovernmental Association	A regional council of governments working with member governments, their citizens and others to empower communities and enhance the quality of life.	Participating on the brownfields Steering Committee and project teams. Also working with the City to ensure that brownfields reuse plans are integrated with the region’s transportation, land use and economic development plans.
Dubuque Area Chamber of Commerce	An organization representing the broad range of private sector business interests in the City.	Participating on the brownfields Steering Committee and project teams. Also working with the City to provide widespread outreach and information to Dubuque’s business community.

4. PROJECT BENEFITS

a. Health and/or Welfare & Environmental Benefits

i. Health and/or Welfare Benefits – The project’s health and welfare benefits include:

- Excavating soils on the Blum property will eliminate direct contact with, inhalation of and indoor vapor intrusion by harmful contaminants (lead, arsenic, PAH, PERC, ACM) for Washington Neighborhood residents;
- Preventing the installation of private wells on the site will sever the groundwater ingestion pathway of hazardous materials;
- Removing contaminants will reduce the risk of cancer and non-cancer health hazards, particularly for vulnerable populations including children and pregnant women;
- Creation of a pocket park on the Blum property will improve access to public open space for low-income residents;
- Reuse of the site as a recreation facility will encourage active living and improve health outcomes in a designated Medically Underserved Area;
- Providing a connection with the Mississippi River Trail will help residents travel safely to other points within city and the region beyond;
- Enhancing transportation alternatives will improve the mobility of Washington Neighborhood residents with no vehicle (more than 30%), providing greater access to employment, education, health care, and other civic opportunities;
- Cleaning up contaminants will reduce run-off pollution into the Mississippi River, thereby protecting the health those dependent on the river for subsistence fishing;
- Brownfields cleanup will remove blight and increase community pride among Washington Neighborhood residents;
- Revitalization activities will encourage other Washington Neighborhood residents and business owners to improve the appearance of their properties, and lift quality of life; and
- Elimination of blight and improved quality of life in the Washington Neighborhood will decrease crime.

ii. ***Environmental Benefits*** – Dubuque has established itself as a national and global sustainability leader. Brownfields cleanup supports the City’s sustainability goals by promoting smart growth, reducing sprawl and protecting green space. EPA Brownfields resources for the Blum property will produce the following environmental benefits:

- Cleaning up the contaminated former scrap yard will improve air, surface water, groundwater, and soil quality;
- Remediation efforts will eliminate exposure pathways for aquatic life in the Mississippi River;
- Recycling of building materials during demolition will reduce landfill waste;
- Green infrastructure on the revitalized Blum property will help store rainwater where it falls, prevent flooding and reduce polluted stormwater runoff; and
- Redevelopment in the Washington Neighborhood will support residents who choose not to own a vehicle, which thereby decreases fuel use and reduces greenhouse gas emissions and climate impacts.

b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

i. ***Planning, Policies & Other Tools*** – Sustainable reuse of the Blum property will be fostered by a number of existing local planning efforts and policies:

- The *Dubuque Sustainability Plan* guides government, business, non-profit, and individual actions in the community. Redevelopment of the Blum site will be shaped by the plan’s 12 principles (Clean Water, Community Design, Community Health & Safety, Community Knowledge, Green Buildings, Healthy Air, Healthy Local Food, Native Plants & Animals, Reasonable Mobility, Regional Economy, Smart Energy Use, and Smart Resource Use).
- Dubuque adopted a *Unified Development Code* in 2010 that combines the City’s previous Zoning Ordinance, Subdivision Regulations, Historic Preservation Ordinance, and portions of the Building Code. The *Unified Development Code* was developed “to encourage sustainable design and development.” Reuse of the Blum property will align with the Unified Development Code.
- Connecting a proposed bike trail on the Blum property to the national Mississippi River Trail supports Dubuque’s *50% by 2030 Community Climate Action & Resiliency Plan*, which seeks to reduce the community’s greenhouse gas emissions. Improvements to the pedestrian and bicycle trails network is also an objective of the Dubuque Metropolitan Area Transportation Study’s *Long Range Transportation Plan 2040*.
- The *Dubuque Comprehensive Plan* encourages “redevelopment opportunities within the city in an effort to revitalize unused or underused property.” Reuse of the Blum property supports the plan’s goal to make green space, trails and recreational facilities easily accessible to residents at the neighborhood level.
- Building deconstruction and recycling supports the *Dubuque Comprehensive Plan*’s goal to “promote alternative uses other than disposal for construction/demolition materials.”
- In 2015, Dubuque was awarded an EPA Brownfields Area-Wide Planning grant to support the revitalization of its South Port area. That effort seeks to reuse transportation infrastructure that connects the Washington Neighborhood with the South Port.

ii. ***Integrating Equitable Development or Livability Principles*** –

- **Provide More Transportation Choices**
 - A proposed bike trail on the Blum property will link with the Mississippi River Trail, connecting Washington Neighborhood residents with destinations across the city and beyond;

- Redevelopment will be integrated with the Jule bus system, which will increase transit ridership; and
- Downtown revitalization leverages investment in the nearby Dubuque Intermodal Transportation Center, a new transit hub for the Jule bus system, as well as the future terminus of Amtrak operations.
- **Promote Equitable, Affordable Housing**
 - Green space on the Blum property provides recreational opportunities for residents of affordable housing in the Washington Neighborhood.
- **Enhance Economic Competitiveness**
 - Cleanup of the Blum property supports further revitalization efforts in the Washington Neighborhood, creating economic opportunities for low-income residents.
- **Support Existing Communities**
 - Landscaping and open space will improve air and water quality, and enhance quality of life;
 - Dubuque will utilize low-impact development and green space on the Blum property to prevent stormwater run-off; and
 - Redevelopment in the Washington Neighborhood will recycle deconstructed materials during their restoration, thereby conserving resources.
- **Coordinate and Leverage Federal Policies and Investment**
 - The project will leverage millions of existing local, state and federal investment, and provide new opportunities to secure additional revitalization and infrastructure resources.
- **Value Communities and Neighborhoods**
 - Brownfields cleanup will remove blight in the Washington Neighborhood and increase community pride; and
 - Remediating contaminants will limit exposure to hazardous substances, particularly for children and pregnant women, thereby reducing cancer and health risks.

c. Economic and Community Benefits

i. Economic or Other Benefits – Revitalization efforts in downtown Dubuque will create tremendous economic and non-economic benefits. Redevelopment of the Blum property will lead to other brownfields efforts, including a plan to cleanup and reuse the site of another scrap metal dealer across the street. Economic benefits of continued brownfields remediation activities in the Washington Neighborhood include new jobs, increased tax revenues and higher property values.

Reuse plans for the Blum property include constructing a bike trail, bike pavilion, playground equipment, and public bathroom to serve the adjoining Bee Branch Creek daylighting project. This public park will provide significant non-economic benefits, including improved recreational access, increased transportation choice via the trail network, reduced health disparities due to more active living, and enhanced quality of life.

ii. Job Creation Potential: Partnerships with Workforce Development Programs – Dubuque will encourage its contractors to recruit and hire low-income residents from the impacted Washington Neighborhood. Specifically, the City will:

- Coordinate with Iowa’s Region 1 Workforce Investment Board as the Request for Proposals for environmental consultants is prepared;
- Seek the bids of local qualified environmental consultants; and
- Encourage consultants to participate in local job fairs to hire skilled workers.

5. Programmatic Capability & Past Performance

a. **Programmatic Capability** – Dubuque has a long track record of successfully managing community projects. Key to this effort is the development of a detailed work plan with clear milestones and responsibilities. This will be developed at an initial meeting, including participation from Mayor Roy Buol, the City Manager, the City’s Economic Development Director, and other key staff. Mel Pins, Iowa’s Brownfield Redevelopment Program Executive Officer, will also be invited to participate. The meeting will identify goals and strategies, and responsibilities within the work plan will be well-defined and delineated. Performance measures will help to track progress. To ensure that the project is on schedule, status updates will be incorporated into the City’s existing reporting structure. Monthly reports will be provided to the City Manager. In addition, staff will meet regularly with key partners, including representatives from the Washington Neighborhood Development Corporation, Greater Dubuque Development Corporation, Community Foundation of Greater Dubuque, East Central Intergovernmental Association, and Dubuque Area Chamber of Commerce.

The City has the staff expertise necessary to manage the project. A project manager will lead all project teams and will be invested with the authority necessary to complete the project. Project management duties will be assigned to Maurice Jones, Dubuque’s Economic Development Director. Maurice is responsible for developing and coordinating programs to meet the social, economic and physical development needs of the community. His areas of expertise include downtown revitalization and redevelopment. Maurice has experience managing federal funding (he currently administers the EPA Brownfields Assessment and Area-Wide Planning grants). He will serve as a liaison between EPA Region 7 and Dubuque, and will be responsible for assuring compliance with the administrative and reporting requirements of the cooperative agreement. Maurice will lead all of the community engagement activities, and will be responsible for hiring and managing paid consultants. Maurice previously served as a managing partner with Paratus Scientia, LLC, a strategic organizational design and development firm. From 1999 to 2008, he was economic development officer for the Louisville Economic Development Authority, the development agency for the Louisville, KY metropolitan government.

The City is using a team approach to ensure that work on the project is not dependent on just a few key personnel. Two project teams have already been established with EPA Assessment funds. A Community Engagement Team will continue to implement strategies to enhance the involvement of citizens in the redevelopment of the Washington Neighborhood. The Community Engagement Team will be composed of members of various City departments, as well as members of community associations, the business community, education sector, nonprofit field, and other stakeholders. A second Technical Team will support cleanup activities at the Blum property.

Maurice will be supported by qualified interdepartmental staff, including the Planning Services Manager, Sustainability Coordinator, Human Rights Director, Community Engagement Coordinator, Human Relations Specialist, Multi-cultural Family Center Director, City Engineer, Finance Director, City Attorney, and Intercultural Competency team members. The teams will be staffed with employees who work well together to accomplish project goals. This redundancy will ensure that milestones will be achieved, even in the event of employee turnover. Should new staff need to be recruited during the project, Dubuque will seek candidates who have previous with experience with brownfields redevelopment. Open positions will be filled quickly, and new staff members will be assimilated into the team structure. The team approach will help accelerate the learning curve of any new employees.

Dubuque will hire qualified consultants to help: support community engagement activities; engage with IRL's Land Recycling Program; finalize cleanup plans; and conduct ACM abatement, demolition and excavation activities. These services will be solicited using standard procurement practices. The City's established procedures include seeking statements of qualifications and price. Professionals with previous EPA Brownfields experience will be encouraged to compete. Contractors who submit the lowest bona fide bids and are considered to be fully responsible and qualified will be selected.

b. Audit Findings – Dubuque has an exemplary record of managing federal funds, and has never been cited for any adverse audit findings from an Office of Management and Budget (OMB) Circular A-133 audit. The City has also never been required to comply with special “high risk” terms or conditions under OMB Circular A-102.

c. Past Performance & Accomplishments

i. Currently or Has Ever Received an EPA Brownfields Grant

1. Compliance with Grant Requirements – Recent examples of EPA-funded brownfield projects include:

- In 2013, the City was awarded a \$400,000 EPA Brownfields Assessment grant. The funding is supporting brownfields assessments in the Historic Millwork District, Washington Neighborhood and South Port. The project is underway, and Dubuque has contracted with HR Green to conduct the environmental testing. The grant period is scheduled from October 1, 2013 to September 30, 2016. Approximately \$265,000 of Assessment grant funds remain, all of which will be expended by the end of the grant period.
- In 2015, Dubuque was awarded a \$200,000 EPA Brownfields Area-Wide Planning grant to initiate a revitalization effort in the South Port. The project has launched, and Dubuque is currently contracting with a planning team. The grant period is scheduled from September 1, 2015 to September 30, 2017. Approximately \$200,000 of Area-Wide Planning grant funds remain, all of which will be expended by the end of the grant period.

A work plan was established for both grant efforts. Dubuque is making substantial progress on the Assessment grant, and has just begun work on the Area-Wide Planning grant. All grant requirements have been met to date, including the filing of timely quarterly reports. Dubuque has established a cooperative relationship with its EPA Region 7 grant manager. Project data is also routinely being submitted into EPA's ACRES reporting system.

2. Accomplishments – Highlights of Dubuque's successful brownfields work include:

- **Assessment**
 - Contracted with HR Green;
 - Effective outreach has included press releases, a Brownfields brochure, a property tracking webportal that provides access to completed reports, webportal information cards, legal notices, website postings, public meetings, one-on-one meetings with key property owners;
 - 2 community meetings hosted;
 - 75 brownfields sites identified;
 - 5 Phase I ESAs in progress;
 - 4 Phase I ESAs completed;
 - 1 Phase II ESA in progress; and
 - 1 Phase II ESAs completed.

- **Area-Wide Planning**
 - Contracting with Shive Hattery, Inc.

All outputs and outcomes have been accurately inputted into EPA's ACRES reporting system.