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The Brownfields Cleanup Revolving Loan Fund in the Great Lakes Region: Assessment and Recommendations

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THE BROWNFIELDS CLEANUP REVOLVING LOAN FUND IN THE GREAT LAKES REGION: ASSESSMENT AND RECOMMENDATIONS

**A REPORT ON THE IMPLEMENTATION OF THE BCRLF
IN GREAT LAKES PILOT COMMUNITIES**

Prepared for:
THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

By:
The Great Lakes Environmental Finance Center
Technical Advisory Committee
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PREFACE

The Great Lakes Environmental Finance Center (GLEFC) was established in June 1995 through a grant from the United States Environmental Protection Agency. The Center is housed within Cleveland State University's Urban Center, and the Executive Director is Kevin O'Brien. Eight similar centers are based around the country serving the needs of other EPA regions. The client-focused services offered by the Center include technical assistance, training, and research and advisory services in solving financial, marketing, and planning problems related to environmental facilities and resources. The Center's goal is to help client communities devise effective financing and marketing strategies for brownfield projects, as well as to identify and test the most effective redevelopment strategies used across communities in our region.

INTRODUCTION

The GLEFC was asked by the United States Environmental Protection Agency's (USEPA) Region 5 brownfields staff to provide an assessment of the viability and implementation of the Brownfields Cleanup Revolving Loan Fund (BCRLF) by the 12 pilot award recipients in the Region. The purpose of this report is to evaluate the administrative performance of the BCRLF at the 6-state regional level. It should be stressed that this is not an evaluation of the performance of individual pilots. This assessment was intended to be a "snapshot" of the pilot community's implementation of the BCRLF, and the site visits were all made in conjunction with EPA's pilot management staff. The GLEFC team of Kirstin Toth, Project Manager and Adina Wolf, Research Associate, led the discussions of how best to spur activity in the loan product, and what conclusions could be made about the program to increase its effectiveness. Donald T. Iannone, the former GLEFC Executive Director, served as a consulting advisor to the project.

This report identifies the major common themes throughout the 12 pilot communities and their relevant issues surrounding the use of the BCRLF, how the program is operating, and barriers to its implementation. There is also a brief description of how other EPA regional managers are addressing their BCRLF pilots and finally, recommendations from the GLEFC on what it will take to make the BCRLF program successful in the region.

THE PURPOSE OF THE BCRLF AND ITS STRUCTURE

HISTORY OF THE BCRLF AND ITS USE

The original purpose of the BCRLF was to provide a unique funding mechanism to help foster community-led brownfield cleanup. The loan program can be used for site cleanup by both public sector and private sector parties, making it useful

as a brownfield redevelopment tool for use by a broad range of project developers. However, the Region 5 pilot award recipients received their fund awards as long ago as three years, (in the amount of \$350,000 each for those awarded in 1997 and \$500,000 each for the 1999 awards) and have, as of yet, made no loans from the funds. This circumstance is not unique to Region 5: across the nation in the first two funding rounds, out of 68 pilots, only four completed loans have been made from the BCRLF program since November 1999. The reason for this slow implementation of the program is multi-faceted, predominantly (but not exclusively) having to do with the administrative burden placed upon award recipients and fund end-users.

HOW THE BCRLF WORKS

The BCRLF is structured as granted funds to the pilot recipient, in either \$350,000 or \$500,000 amounts, depending upon the timing of the award. The State of Illinois' Environmental Protection Agency (IEPA)'s award differs slightly, with the state receiving \$3.5 million to be used by seven Brownfield Redevelopment Coalition members, which include six communities and the State of Illinois (IEPA). The original intent of the program was to “foster development and implementation of financial and administrative approaches that can support self-sustaining efforts by states, local governments, and Indian tribes to facilitate brownfields cleanup efforts.”¹ When the BCRLF was first introduced, the BCRLF funds were targeted as awards to the original Brownfield Assessment Pilot Grant recipients, in the hopes that a larger pool of redevelopment funds could be partnered with the Assessment Pilot project properties. This would thereby couple grant funds with the unique loan fund in order to focus more attention on the original Assessment Pilot projects. In the second and third rounds of BCRLF awards, the requirement that a BCRLF recipient had to be a Brownfield Assessment Grant recipient was lifted, opening up the potential for the funds to a much larger pool of applicants.

¹ US EPA, Solid Waste Emergency Response website, BCRLF Administrative Manual, page I-4

As a revolving fund, the intent of the fund was to eventually build the funds and learn “about how to structure, establish, and operate revolving loan funds to effectively support brownfields cleanup.”² While there is no specific requirement that the funds be capitalized beyond the original award amount, this is typically the expectation of operating a revolving loan fund. The projected buildup and growth of each revolving fund, however, has not been the experience of the current award recipients. Not only has there been no additional capitalization in the funds beyond the original award, communities have been challenged to find ways in which to creatively use the funds in any brownfield redevelopment projects. In February of 2000, Region 5 issued a letter to all first-round 1997 BCRLF recipients requesting that a loan be made from each fund prior to September 2000, or risk losing the funds altogether or other alternative actions by US EPA. (See Appendix A.)

Individual project loans can be structured almost solely at the discretion of the award recipient, meaning that a BCRLF community can establish loan terms as favorable as it deems necessary. As long as there is an established repayment schedule and a defined method to determine a market interest rate (if a “market rate” is chosen), then there is no maximum loan amount and the loan can be for any term, from zero per cent interest to a market rate. (The maximum loan amount is limited to the amount the community has been awarded.)

There are significant regulatory requirements in order to use the BCRLF funds. The funds can only be used for approved cleanup activities, not for assessment. Petroleum cleanups are not allowable under the BCRLF program (except in the case of co-mingled waste), excluding a sometimes-significant market of potential sites (e.g., abandoned gas stations, underground storage tanks.) Asbestos

² US EPA, Solid Waste Emergency Response web site, BCRLF Administrative Manual, page I-4

cleanups are similarly excluded. In addition, owners who are considered responsible parties for pollution (RP's) are also ineligible to use the BCRLF.

There is a common perception that the difficulty of meeting cleanup requirements under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), outweighs the benefit of using the fund by communities in the Region (and presumably the nation.) Only two exceptions in the Region to this generality are identified: the City of Chicago and Wayne County, Michigan (metropolitan Detroit) have addressed utilizing the fund without concern over the CERCLA and NCP requirements, and their experience is described below, under the section "Major Themes", page 9.

USEPA's role is substantial in the management of the pilots. This substantial involvement generally comes under the auspices of ensuring recipients stay within the parameters and regulations established under CERCLA requirements, under which the BCRLF funds are managed. This oversight and management includes "... approving site-specific Community Relations Plans and quality assurance project plans/sampling plans. In its oversight role, the U.S. EPA is responsible for ensuring that all environmental response actions conducted under the BCRLF program are conducted in accordance with the cooperative agreement and CERCLA, and are consistent with the NCP."³

COMPARISON REVOLVING LOAN FUNDS

Structured as a Revolving Loan Fund (RLF), the BCRLF appears reasonable in its ability to be funded by a variety of sources, primarily loan fund repayments, as well as funds from eligible partners, such as other public entities, banks, or community development corporations (CDCs). However, the progress of the fund's capitalization cannot be predicted until there is more national BCRLF loan

³Section IV., Roles and Responsibilities, BCRLF Administrative Manual, May 1998.

activity and experience in structuring terms and repayments. While no BCRLF in Region 5 has been capitalized beyond the initial EPA award, many states in the region are currently operating similar types of RLFs.

A sampling of RLFs in the Great Lakes region are presented here as a comparative assessment of the structure of relevant (brownfields related) RLFs.

- The Ohio EPA, along with the Ohio Water Development Authority, operates the Water Pollution Control Loan Fund (WPCLF), the first state revolving fund (SRF) in the country to be applied to brownfields projects. Funds can be used for both assessment and cleanup activities, following the state's voluntary cleanup program guidelines. The WPCLF is capitalized at more than \$1.6 billion with a small fraction of its loans going toward brownfield projects (approximately \$10 million since 1989) but is worth mentioning here because Ohio has no other revolving fund utilized for brownfields cleanup. Its terms permit up to \$3 million per loan, up to 20-year terms, with an interest rate tied to the state's General Obligation bond rate (4.64 percent as of June 2000). The fund is capitalized through three sources: federal capitalization grants (plus state match from sale of revenue bonds), the sale of revenue bonds (leveraging the fund), and repayment stream from past loans. Federal capitalization is received annually. Ohio received approximately \$844 million in federal capitalization grants between 1989 and June 30, 1999.

For brownfield projects, phase I and II assessments are eligible at a five-year term of 3.2 percent with the ability to roll the loan into a longer term remediation loan. Loans for remediation are also 3.2 percent for a five-year term. Communities are eligible for longer term remediation loans up to a 20 year term currently at 4.64 percent. Remediation activities such as aquifer remediation and removal of contaminated soils and UST's are examples of eligible projects that have a water quality benefit. The WPCLF has made 15 brownfields loans for a total of approximately \$9.6 million.

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- The Illinois EPA is about to kick off a new Illinois Brownfield RLF, anticipated to begin loaning in the fall of this year. It is capitalized from state general funds with a total of \$10 million to start (\$2 million per year for five years.) The interest rate is one-half of prime, currently about four percent. Funds can be used for both assessment and cleanup, as well as for petroleum cleanup. Loans have not yet been made from this new fund.
- The State of Michigan Department of Environmental Quality currently runs three revolving loan funds for water pollution control projects, drinking water, and for small business pollution prevention. The water pollution control fund, known as the 'State Revolving Fund,' is intended to assist municipalities in funding wastewater treatment improvements. The Department estimates that \$200 million will be available for fiscal year 2000. The interest rate for this program is currently 2.5 percent. The source is the State of Michigan General Fund with federal funds used to supply matching funds. The drinking water revolving fund is intended to assist water suppliers in providing safe/high quality drinking water. An estimated \$25 million is available in fiscal year 2000 and with an interest rate that was 2.5 percent as of June 2000.

The small business pollution prevention revolving loan fund was established to facilitate the implementation of pollution prevention projects by small businesses in Michigan with 100 employees or less. The loans must be used to implement pollution prevention projects that either eliminate or reduce waste at the point of generation or incorporate environmentally sound reuse and recycling. Loans are available for up to \$100,000 at an interest rate of five percent or less. Half of the loan comes from a participating lending institution. The initial allocation for the fund is \$5 million, and the source is the Clean Michigan Initiative Bond Fund. No loans have yet been made in Michigan for brownfields redevelopment purposes.

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- Minnesota's Water Pollution Control Revolving Fund is available to any home rule charter or statutory city, county, sanitary district, or other governmental subdivision having primary responsibility for wastewater treatment. Projects must be included on the Minnesota Pollution Control Agency's Project Priority List and Intended Use Plan. Interest rates are determined by a Quarterly Set Rate minus discounts based on demographic characteristics of the borrower, or borrowers may receive a discount from the Authority's bond rate. The maximum term for the loans are 20 years. Since the fund has been in operation since 1989, 192 loans have been made for a total of \$367 million. None of these loans are applicable to brownfields projects, however.
- Indiana's Environmental Remediation Revolving Loan Fund was created in 1997 to provide financial assistance to political subdivisions for identification, assessment, remediation, demolition, and other costs involved in redeveloping brownfields. The legislation dedicated \$10 million over a three-year period for brownfield redevelopment. The \$10 million program was allocated as follows: \$5 million for the first fiscal year (1997-1998) and \$2.5 million in each of the ensuing fiscal years (1998-1999, 1999-2000). This includes both a grant and loan program, with 20 percent of each new allocation of funds set aside for grants for site assessment purposes only. The balance of the available funds is used for low-interest loans. Examples of activities eligible for funding under the loan program are remediation, demolition, and site preparation actions. Seven low-interest loans have been approved to date totaling nearly \$1 million dollars. Of these, four have qualified as partially forgivable loans. In 1999, the program was amended to include partially forgivable loans, and additional funding of \$5 million was set aside to fund them. The forgivable loan provisions give priority to projects that either involve underground storage tanks or are located within one-half mile of elementary or secondary schools or specific child care facilities. In addition, political subdivisions must specify and achieve economic development goals in order to obtain partial loan forgiveness. Not more than

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20 percent of the total amount of the project loan may be in the form of a forgivable loan.

THE BCRLF IN REGION 5: MAJOR FINDINGS AND BARRIERS

From February through May 2000, the GLEFC team visited each of the 12 BCRLF pilot managers to ascertain their implementation of the BCRLF and to uncover relevant issues and concerns. These meetings provided great insight in to the planning and administration of the BCRLF program and how different each community is from the next. From identifying project selection to gauging where the administration of the brownfields redevelopment effort is within the community, the site visits proved illuminating and helpful for all participants. A short summary of the findings from each site visit can be found in Appendix B. The following section addresses the major themes common across all of the BCRLF pilot communities and identifies the barriers that were repeatedly revealed as solid issues for each community to overcome in order to make the BCRLF successful.

MAJOR THEMES: HOW THE BCRLF IS IMPLEMENTED

There are several issues of concern about implementing the BCRLF that have been common among all of the pilots the GLEFC visited. It was mentioned above that each pilot community in Region 5 is very different in the scope of its project selection and/or the way the program is managed, but there are clear themes across all of the pilots worth highlighting here.

- There is no one pilot recipient that has made a loan from the BCRLF, although five of the communities have identified specific projects to target for the BCRLF, (the City of Chicago, the West Central Municipal Conference, Illinois EPA, Hennepin County, and Wayne County). While these communities have advanced to a stage of project identification for the BCRLF, an actual loan disbursement is months away, or longer. The remaining communities share a general lack of focus on the program for a variety of reasons, largely due to their

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attention to other funding sources, or other projects altogether that that require less focus on compiling several funding sources or complex funding programs such as the BCRLF.

- Where there is a substantial brownfields administrative structure already in place, there is a clearer focus on the intent, mechanics, and target marketing strategy for the BCRLF. This is especially true of the City of Chicago; Wayne County, Michigan; and Hennepin County, Minnesota. Specifically, the City of Chicago and Wayne County have an administrative structure with enough resources (dedicated, knowledgeable staff) and funding sources to implement the use of the BCRLF without the perception or reality that is overwhelming. The City of Chicago has clear executive leadership making all brownfields redevelopment a priority, thereby creating a department dedicated to identifying creative uses for any brownfields funding available. And, Wayne County has utilized the services of its consulting firm to address the funding and project management of its brownfield redevelopment both from an environmental perspective, *as well as* its financial management. This has enhanced Wayne County's ability to utilize a variety of funding sources because of the support and help from their environmental consultant.
- Only one pilot recipient is utilizing the fund specifically for its Assessment Grant project, the original intent behind the initial BCRLF strategy. This is successful so far only in Wayne County, Michigan, where their environmental firm coordinates the complex dual-administrative burden of both the grant and loan programs at once. Wayne County has committed to making their project successful by focusing on this creative use of their environmental firm, who has the financial knowledge and capacity to perform this unique function. The Illinois EPA has also identified a consortium of the original Assessment

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Grant communities for which the BCRLF will be used; specific projects have been targeted but not yet specified for the BCRLF program. The rest of the BCRLF pilot recipients have not been able to identify an appropriate project that was also an Assessment Grant activity, or there was no Assessment Grant previously awarded.

- A variety of local resource issues factor into the implementation of the BCRLF in all communities, whether it be lack of staff time or the lack of capacity to manage the complexities of the CERCLA requirements, or the lack of expertise in economic development and managing brownfield redevelopment deals. This is especially true in communities where the pilot fund has been handed to a department for implementation without understanding what they were getting into. The City of Detroit; Battle Creek, Michigan; and Columbus, Ohio all have excellent planning, economic development, and environmental staffs, but lack the collaboration and/or experience to manage a brownfield redevelopment project as a real estate deal with an environmental component. There is either a lack of experience in economic development principles, or environmental assessment and cleanup, or both.

BARRIERS TO SUCCESSFUL IMPLEMENTATION OF THE BCRLF

Underlying the problems highlighted above and the slow implementation of the BCRLF in Region 5 are several key barriers that have been identified by the GLEFC as well as by the pilot recipients. These are fairly clear and present in all BCRLF communities and present a major challenge for both USEPA and to each pilot to overcome to create a successful loan fund program.

1. There is a clear lack of focus in the BCRLF in the face of existing competitive financial resources for brownfields redevelopment. There

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are a number of substantial funds already available for brownfields redevelopment in the form of grants or loans that do not require the administrative demands of CERCLA or similar burdens of the BCRLF. These are listed below:

- a. **The Clean Michigan Initiative** provides a variety of brownfield grants (up to \$1 million per project) and loans (up to \$1 million in revitalization loans) to Michigan public entities, with the added benefit that the site redevelopment is managed and cleaned up by the Michigan Department of Environmental Quality (DEQ). Michigan also offers a generous tax benefit for companies who locate in Renaissance Zones and redevelop brownfield sites: complete state tax abatement including property and personal income tax abatement for ten years. The Clean Michigan Initiative also provides a variety of other pollution prevention, landfill remediation grants, and other generous funding sources that make the use of the BCRLF a secondary resource, and lesser priority.

- b. **Minnesota's Department of Trade and Economic Development Contamination Cleanup Grants** total more than \$21 million over the next two years and fund up to 75 percent of the costs of cleanup for any eligible project for a development authority, which includes municipalities, counties, airport authorities, port authorities, etc. The **Metropolitan Council's Tax Base Revitalization Program** also provides \$ 5 to \$ 7 million in cleanup grants in the **Metro Council's seven-county area.**

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- c. **The Indiana Development Finance Authority** manages the state's **Environmental Remediation RLF**, which provides \$10 million for low-rate loans to communities for cleanup. Site Assessment Grants of \$50,000 each are also available.

- d. **The City of Chicago** has committed substantial resources, \$10 million, from general city funds to provide loans of up to \$150,000 to small businesses to spur redevelopment, cleanup, and environmental compliance. The City of Chicago takes an active, developer-oriented role to assemble and own sites and clean them up for redevelopment. This type of resource and focus allows the City to utilize the BCRLF itself, instead of promoting its use to a private third party borrower, because it has the administration in place to manage the project from start to finish. This level of resource is unparalleled in Region 5, and in most of the nation.

The availability of these substantial funds, along with smaller, yet easier to access funds and financial sources not mentioned here make using the BCRLF a last resort. The ease with which the other competing grants and loans can be used compared to the administrative burden of the BCRLF is also a major factor in the lack of focus on the BCRLF.

2. The administrative complexity of the BCRLF is a major barrier to its implementation. The details required as a result of the fund's establishment under CERCLA makes the use of the fund overly burdensome, especially to a community that is not equipped with staff resources or expertise to manage the financial and environmental components together. The following identifies the specific

administrative concerns highlighted by the GLEFC as well as the BCRLF pilots in Region 5.

- a. Compliance with the NCP requirements of the Quality Assurance Project Plan (QAPP) and the Engineering Evaluation-Cost Analysis (EE-CA)** require oversight and approval by EPA Region 5 staff. There are no clear guidelines for producing these site-specific documents under the BCRLF, and the pilot communities are seeking this specific guidance so they know what is expected. Creation of these documents can be quite costly to a project developer seeking to move forward with a redevelopment and who already has financial constraints for project completion. There is also an unknown time factor involved in the approval process required of Region 5 for these project-specific documents, making marketing of the program to a private developer unlikely. BCRLF pilots with experience in oversight, such as the Illinois EPA, the City of Chicago, and the MPCA, are better equipped to produce the documentation, but no better equipped to estimate the timeframe for turnaround on approvals from Region 5.
- 3. The exclusion of petroleum cleanups and the participation of some classes of responsible parties (RPs) are a barrier to the use of the BCRLF.** There is a growing desire in many communities, especially in some of the smaller communities, to address the number of abandoned gas stations or auto service shops that are littered throughout a town or small city. This is especially evident in Battle Creek, Wayne County's smaller cities outside Detroit, Indianapolis, and communities in the Illinois EPA's consortium. These projects are all prohibited under the BCRLF

funds unless there is evidence of co-mingled waste, which is unlikely for most gas stations.

In addition, it seems unwise to completely prohibit the participation of some selected classes of RPs, namely ongoing viable business operators of scrap metal yards and municipal landfills such as highlighted by Hennepin County. Hennepin makes a strong argument to include this class of responsible party in a loan program because they will be required to pay back the funds and will come into environmental compliance and operate in a more sustainable way after cleanup is performed. The GLEFC agrees with this concept, and believes the exclusion further limits the use of the BCRLF.

WHAT OTHER EPA REGIONS ARE DOING TO IMPLEMENT THE BCRLF

As part of this study, conversations were conducted with representatives of the other EPA regions about their work with the BCRLF. The regions varied greatly both in their involvement with the individual pilots and with the amount of loan activity occurring in their region. As previously mentioned, only three loans have been made nationally (as of this writing), in Stamford, Connecticut (Region 1), Las Vegas, Nevada (Region 9), and Trenton, New Jersey (Region 2). These three regions were contacted and interviewed for information about their management of the project and their perspective. (See Appendix C for Interview Contacts.)

Region 1 has taken a very proactive approach to the BCRLF. It has put together three training sessions, the first to educate potential applicants about the program; the second to explain the cooperative agreement and process as well as the expectations for workplans; the third to explain implementation and the NCP guidelines. Training materials for this workshop include the actual loan documents used for the Stamford loan. These materials have been forwarded to Region 5 by the GLEFC. Region 1 stressed that there are unique issues for

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each pilot and that a significant amount of time must be spent with each pilot in order for the program to be successful. Region 1 currently has 15 pilots, all of whom have completed their workplans.

The first BCRLF loan was made in Region 1, in Stamford Connecticut. The borrower for the project was Clearview Investment Management Inc, a corporation who specialized in the management of waterfront and other properties and who had redeveloped several properties in Stamford. The City loaned \$250,000 for this project. The site of the project is owned by a subsidiary of Northeast Utilities. The site was operated as a shipyard from 1937 through 1970 and contains lead and arsenic contamination co-mingled with petroleum throughout the site. The site will be redeveloped into a residential water-dependent shorefront community with approximately 320 residential units and a marina facility. In addition, the development will include an extensive boardwalk system and a public fishing pier. The loan is expected to leverage \$50 million in private development funds. It is important to note that the key to success for this project was the mayor requesting that the developer take the loan. In addition, the pilot as well as the Region was motivated by a desire to be the first to make a loan.

Region 9 also works very closely with its three pilots. In addition, Region 9 indicated that for the Las Vegas loan, the ability to move the loan quickly and have all documents in place was a major key to success for the loan. Region 9 noted that the project manager at Region 1, having already completed a loan, was a major resource for this process and Stamford Loan documents were used extensively as a model. In addition, the pilot contact at the City of Las Vegas, as well as the Long Beach pilot, where a loan is expected shortly, were very motivated and had a strong desire to complete a loan. These pilot managers also made an effort to keep in close contact with the Region.

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For the Las Vegas loan, the project site is a former National Guard Armory, 3.6 acres in size. Operation at the site included the storage of petroleum, oils, lubricants, and hazardous materials, including the storage and maintenance of vehicles. The site was returned to the City of Nevada in 1997. The site was selected for redevelopment as a community center that will serve as a senior center, small business center/ incubator, cultural arts center, and limited retail space. Soil contaminants consisted of CERCLA-listed solvents and metals commingled with diesel range petroleum hydrocarbons. These were found during the assessment phase of the project. A \$50,000 loan was made to clean up site. The loan is between the City of Las Vegas and the City of Las Vegas Redevelopment Agency, a separate political subdivision of the State of Nevada. The term for the loan is two years at an interest rate of two percent. As mentioned previously, the success factors for this loan were the ability to move through the process quickly, the Stamford model to follow, and the motivation of both the pilot and EPA representatives. In addition, by lending to a closely related government entity, the process was significantly simplified.

In Region 2, the City of Trenton has just recently received final approval for its loan for approximately \$270,000. Like many pilots, Trenton had initially intended to loan its funds to private developers. However, it determined that private developers had no interest in the BCRLF given the administrative complexities of the program and chose instead to loan money to its own redevelopment entity. Trenton found making the loan to still be a difficult and lengthy process and also found a close working relationship with the Region 2 to be essential to the success of the loan.

When asked about barriers to the success of the BCRLF, the same issues were mentioned as Region 5 pilots had indicated. These barriers included a lack of staffing at the EPA regional offices for what is seen as a very labor intensive program, the complexities of the program, the difficulty in marketing the program to private developers, and the exclusion of petroleum-contaminated sites.

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While all Regions indicated that the BCRLF is a difficult program to work with, a number of regions are making some progress. Several regions indicated that they have pilots close to making a loan including Region 9 with the Long Beach pilot, three pilots in Region 1, and three pilots in Region 4. Regions 7 and 8 indicated that their pilots are moving forward with their workplans and documents. Region 6 indicated that it is taking a 'laissez faire' approach and believes that the lack of activity in the program indicated a lack of demand for the product. Region 3 also showed little activity, which it attributed primarily to the complexity of the program.

In summary, in all of the regions where activity is occurring for this program, EPA staff is devoting considerable time to working with the pilots. Thus it is the experience of other regions that considerable EPA contact is needed to overcome barriers to this program. In addition, it is clear that sharing the experience and documents of the more advanced pilots can be of considerable value to beginning pilots. We would recommend that collaboration occur among both the regions and the pilots to share this information.

MAJOR RECOMMENDATIONS TO IMPROVE THE SUCCESS OF THE BCRLF

Following the major findings from the site visits, and from the identified barriers to implementing the BCRLF, the GLEFC has several major recommendations to bolster the program's chances of successful utilization. These recommendations are grouped into recommendations for the BCRLF pilots in the region, and for EPA Region 5.

RECOMMENDATIONS FOR BCRLF PILOT RECIPIENTS

- The pilot community should focus resources on one single project, rather than numerous projects. Identify one single project that has the greatest likelihood of qualifying for the BCRLF and coordinate the necessary resources to channel the project through the BCRLF process. This is recommended due to the large amount of administrative work required in order to complete the documentation under CERCLA. If this large level of work is necessary, the resources are best expended on one large loan, using the entire fund if possible, rather than on several smaller loans. Once a successful project is completed under the BCRLF, use that project to springboard into a fund capitalization marketing campaign. Use the success to highlight the positive aspects of the program to potential capital investors and seek local partners to help implement a community-based BCRLF.
- Consider the self-loan process whereby a BCRLF pilot recipient collaborates with another governmental entity (such as a related local redevelopment authority or county) to implement the loan program for a specific project. This eliminates the third-party (private developer) QAPP approval process and reigns in the approval timeframe to more acceptable standards of governmental entities.

RECOMMENDATIONS FOR US EPA, REGION V

- Eliminate the QAPP approval process by the Regional EPA staff. As long as there is compliance with related site plan formats under a *state's* voluntary cleanup program, the GLEFC sees no reason why this burden should be placed upon the Region or the wait endured by the pilot. The common theme by the pilots was one of frustration with the uncertainty of the specifics of the QAPP, (whether this is perception or reality) and the amount of time needed for approval turnaround once the document was prepared. There is logic in believing that if the project already complies with the state's voluntary cleanup program (VCP) standards for site plans, then the Region can accept those plans as approved at the state level. (This makes sense in those states with that have already reached an understanding and agreement about their VCP with US EPA, which applies to all states except Ohio.)

While the QAP is technically the only document that currently requires approval by Region V, there is the perception by the pilot communities that other related compliance with CERCLA and the NCP, (such as the EE-CA) should be reviewed or otherwise guided by the Region, and thus, adds to the uncertainty and complexity of the loan process. This has to do with the capacity at the local level to manage the BCRLF process and their financial management of brownfields redevelopment, not EPA's oversight or support.

- Provide a template for the QAPP development so that a pilot site manager (and EPA) *can* expedite the most time-consuming of the documents required under the current program. While EPA may not want to dictate formats and may wish to allow a certain amount of flexibility for QAPP, EE-CA, Community Relations Plans, and other document preparation, the BCRLF pilots do not want to have to

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interpret on their own as to what might be approved and what might not be approved. The certainty that comes with a template will save time and help performance to match expectations.

- Provide sample documents of other completed loans. Most pilots in Region 5 still do not have the paperwork from the pilot communities where loans have been made. The documents of most importance are the NCP documentation, the loan agreements, and any related marketing materials. These materials would include flyers, brochures and/or marketing plans used by the other regions.
- Establish some timelines for approval of all the steps required from the Region's standpoint. The pilot recipients cannot realistically market the program if they don't know how long it will take to make a loan.
- Provide a monthly phone meeting or other acceptable forum for BCRLF pilot recipients to discuss their progress. This phone meeting can be short (15 minutes), and still allow recipients to gain a brief update on activities.

CONCLUSION

The prevailing perception among pilots (and so far the reality in Region 5) is that the BCRLF is a very difficult, and almost impossible product to use. At best, it is a financial tool to use as a last resort or for gap financing on a large enough project that can absorb the costs of producing the extra documentation. At the least, the BCRLF is a fund that has little hope of truly revolving and further capitalized if the pilot recipients cannot make a single loan from the original funds.

The GLEFC believes that there are specific uses for the fund that warrant attention, such as the recommendations above imply. Making a single large loan from the fund is far preferable over several small loans. Elimination of regional QAPP approvals or at the very least providing templates for pilots to utilize to complete the required documentation, is a must for the future success of this loan fund.

It is clear to the GLEFC that Region V wants to make this program successful in the Great Lakes, and to provide as much support as possible to the communities focusing on brownfields redevelopment. The GLEFC believes that these recommendations will go a long way to help implement support by the Region.

APPENDIX A: FEBRUARY COMPLIANCE LETTER

APPENDIX B: SITE VISIT SUMMARIES

As part of this study, site visit reports were prepared for each pilot. The following section provides a brief summary of these reports. For a more detailed description of each site's activities and the GLEFC's recommendations, the site visit reports should be consulted.

BATTLE CREEK, MI

Battle Creek was awarded the \$500,000 BCRLF in 1999. The City of Battle Creek has not yet finalized its relationship with its intended fund manager, Battle Creek Unlimited. Battle Creek applied for the BCRLF before the State of Michigan had begun to make funds available for brownfields redevelopment. Since that time, the City has utilized the Clean Michigan Initiative grant program for its redevelopment needs. While Battle Creek initially expected there to be a need for the BCRLF funds, the State of Michigan has since made funds available that currently meet the City's need. Battle Creek does not have extensive experience working on brownfields redevelopment projects and, as a smaller city, has a relatively small staff available for this program. While Battle Creek Unlimited has experience in economic development and fund management, it is also unfamiliar with the administrative complexities of the BCRLF. There are two significant barriers to the use of the BCRLF; competing funds from the state and the administrative burdens of the program.

CHICAGO, IL

Chicago was awarded the \$500,000 BCRLF funds in 1999. It is useful to point out that the City of Chicago enjoys a financial strategy for its use of resources in brownfield redevelopment that is not seen in any other major city in the Great Lakes Region. Because of their administration's commitment to cleaning up contaminated land, the City has dedicated substantial resources in dollars and staff to focusing on brownfield redevelopment. Chicago's primary focus is to act as the prime developer for its public lands. Instead of strictly facilitating redevelopment to the private development sector, the City's primary strategy is to

act as developer itself and move property from non-use to full redevelopment. This is in contrast to many other communities who lack the resources to act as primary developer on every deal. The City is able to allocate substantial resources to seeking and receiving a variety of federal funds, as well as using City operating (“corporate”) funds for assessment, cleanup, and redevelopment. Because the City can utilize this variety of funds in a creative manner, such as for administrative and non-allowable activities under typical federal fund regulations, it can use the federal dollars it does receive all on allowable activities. In other words, it has great latitude in the financial packaging of each of its projects because it has enough of its own resources to apply toward under-funded activities to match up with federal and state resources. In the case of the BCRLF, Chicago intends to use the entire fund as a loan back to itself. It is planning on applying the entire \$500,000 to a property that the City owns and is developing. If the planned use of the funds does not occur, the City will use the BCRLF toward two other projects that the city currently owns. In both of these cases, the City will again loan the funds back to itself.

COLUMBUS, OH

Columbus was awarded the \$500,000 BCRLF in 1999. The City of Columbus has been faced with staffing changes both within the city and with the main contact at the Columbus Urban Growth Corporation. These changes have hindered the start up of the program as Urban Growth Corporation was expected to take a lead in locating prospective projects for the BCRLF. The lead applicant for this pilot is the City of Columbus Department of Trade and Development. This Department has extensive experience in managing economic development revolving loan funds. The City’s Health Department has committed to overseeing the environmental aspects of the BCRLF. In conclusion, Columbus has been slow to start up the program as it expected that the Urban Growth Corporation would take a more active lead. However, brownfields redevelopment is a priority for the City and it does intend to seek appropriate sites.

CUYAHOGA COUNTY, OH

Cuyahoga County was awarded the \$350,000 pilot BCRLF funds in 1997. To date, it has done very little to market or implement the BCRLF. This pilot indicated a number of barriers to the implementation of the program. Major barriers included the administrative burden of the program and competing funds. Cuyahoga County currently has a \$20 million Brownfields Redevelopment Fund capitalized by Non-Tax Revenue Bonds and supplemented by \$5 million in private investment funds. Thus there is little incentive to focus on the administratively burdensome BCRLF. In addition, the County originally envisioned that the State of Ohio and the USEPA would refer potential sites to it. This assistance has not materialized from either site and has not been actively pursued by Cuyahoga County.

DETROIT, MI

The City of Detroit was awarded the \$350,000 pilot BCRLF funds in 1997. This pilot is managed by the City of Detroit Department of Environmental Affairs (DEA). The pilot has spent an extensive amount of time creating documents for the program and has not yet identified likely sites. The DEA, who does not have experience in economic development projects, envisions making a loan to one of the city's many Community Development Corporations (CDCs). However, no CDCs have been approached yet to identify possible projects. The GLEFC has recommended that Detroit may want to explore a closer relationship with the Wayne County BCRLF. In addition to being more experienced in brownfields redevelopment projects, Wayne County has close ties to many of the CDCs and could be a valuable resource for Detroit.

HENNEPIN COUNTY, MN

Hennepin County was awarded the \$500,000 pilot BCRLF funds in 1999. Hennepin County is working diligently to identify a market of eligible properties for the BCLRF program. Hennepin County has indicated that it wishes to fulfill a

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genuine need for cleanup funding within the community and continues to market the BCRLF program to nonprofit organizations and local municipalities and developers in need of gap financing. In an effort to make the BCRLF program more attractive to developers, Hennepin County is promoting the use of Tax Increment Financing to repay the interest and loan principal for BCRLF funds obtained, as well as the possibility of deferring interest on revolving loan funds during the first year. It was clear that Hennepin County is very apprehensive about marketing the program to private developers given the administrative requirements and the uncertainty of the time frame for making a loan. While the County prefers to make the BCRLF program available to those having difficulty securing funding for cleanup of contaminated lands, it may consider pursuing a self-loan option if that is unsuccessful. Hennepin County has put a lot of thought into the type of redevelopment that it feels is appropriate and in need of brownfields funding. However, a number of its preferred uses for the loan are currently ineligible. For example, Hennepin County has launched a proactive, cooperative effort with the scrap yards in the county to develop best management practices and to identify and address contamination. To assist in this effort, the County approached USEPA concerning the eligibility of scrap yard owners or responsible parties for BCRLF funding. However, responsible parties cannot be eligible for the loan. Another responsible party issue is the cleanup of municipal dumpsites. Hennepin County believes that cleanup funding is desperately needed to advance the assessment and redevelopment of such properties to ensure the health and safety of suburban residents and to reduce the financial and administrative burden for municipalities. There is, however, a lack of funding for the cleanup of properties whose end use is green space. Hennepin County has made a compelling argument for the need and public benefit of opening the funds to specific types of responsible party projects.

STATE OF ILLINOIS' ENVIRONMENTAL PROTECTION AGENCY (ILEPA)

ILEPA was awarded the \$3.5 million pilot BCRLF funds in 1998. ILEPA's BCRLF Coalition work plan is completed and training has commenced for members of the state's BCRLF Coalition, which includes these Illinois communities: Canton, East Moline, Lacon, Freeport, Waukegan, Galva, and the State of Illinois itself as a recipient of the funds. Each coalition member will receive up to \$500,000 in funds. While many other states also have brownfields financing programs, ILEPA is one of the few that actually manage their own fund and have the resources to examine and manage financial programs in addition to typical environmental/engineering/ regulatory projects. The ILEPA is also using the BCRLF as a way to establish itself further as a statewide facilitator and key resource for brownfields redevelopment. In creating the BCRLF Coalition, the state has gained a larger fund and is thus able to utilize the funds across varying and numerous communities. ILEPA will take on the administration of the BCRLF and act as fund manager for the BCRLF Coalition recipients. The State of Illinois EPA is in a unique leadership role with its BCRLF Coalition. It has already identified the pool of applicants under its Coalition definition and brings a level of sophistication in financial management not often present in an environmental agency.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM)

IDEM was awarded the \$350,000 BCRLF in 1997. IDEM has a strong history of supporting brownfields redevelopment in the State of Indiana, and has worked successfully with the state's General Assembly to develop and implement legislation that provides specific financing for brownfields assessment, cleanup, and redevelopment. Most notable of the state funds available to Indiana communities, and strongly advantageous over the BCRLF, is the state's Environmental Remediation Revolving Loan Fund (ERRLF), more commonly known as the "brownfields fund." The state legislature has allocated \$10 million through fiscal year 2000 for this program. Cities, towns, and counties are eligible

for this fund. IDEM also indicated they view the BCRLF's restrictions, especially the exclusion of petroleum and asbestos contaminants, as a barrier to its use. In addition, IDEM is concerned about the complexity in meeting requirements for the BCRLF. In order for the program to be successful, however, IDEM needs to increase the visibility of the program and focus on its unique strengths. A significant barrier to the successful implementation of the BCRLF program has been the attractiveness of the state loan program. However, there are opportunities in Indiana for the BCRLF to be utilized, especially for private borrowers or for other state agencies.

INDIANAPOLIS, IN

Indianapolis was awarded the \$350,000 BCRLF in mid-1999. The City of Indianapolis has recently changed leadership with the November elections, with administrative and political changes effective January 1, 2000. As a result, the City's staff and leadership have been in flux until very recently, and the future of brownfield redevelopment as its own distinct department is in discussion. In spite of an indirect approach to brownfields management, the City has been active in redevelopment in recent years. More than 10 brownfield deals are underway or have been completed in the City. There is optimism that the BCRLF will become an immediate useful tool once a formal agreement is completed between the City and the Indiana Development Financing Authority (IDFA), who will administer the fund for the City. It is clear that the BCRLF has distinct but narrow advantages for the City. While the City is currently hindered by the slow closure of the agreement with their financial partner IDFA and a general lack of focus on the BCRLF, it must nonetheless move forward with completing its work plan in implementing the BCRLF.

MINNESOTA POLLUTION CONTROL AGENCY (MPCA)

MPCA received the \$350,000 fund awarded in 1998. The MPCA utilizes the services of the NorthSpan Group in order to market and manage the BCRLF. The Duluth market area was originally selected because of its long history of heavy industry and its likelihood of brownfields redevelopment outside the Twin

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Cities area. The MPCA and the NorthSpan Group have recently agreed to expand the target marketing area of the BCRLF outside the Duluth area to a region that includes seven counties surrounding Duluth. This change was made after it was determined that there were few redevelopment projects in Duluth that would qualify or otherwise be able to utilize the BCRLF. According to NorthSpan, of the 12 projects it has managed over the past two years, only one brownfield redevelopment project was a viable prospect for the BCRLF, and in the end, did not utilize the BCRLF because of the availability of competing funds to move the project forward. The main impediments to the use of the BCRLF in Duluth have been a lack of interest on the part of the City of Duluth to participate in Voluntary Investigation and Cleanup projects. In addition to the low demand for brownfield properties, many of the sites requiring assessment and cleanup are former gas stations, which, due to their petroleum-based contamination, are ineligible under the BCRLF rules. In addition, for many of the sites that are under redevelopment, the state's Department of Trade and Economic Development (DTED) has a generous grant program. Thus a lack of demand due in part to competing funds has been a major barrier for this pilot.

WAYNE COUNTY, MI

Wayne County was awarded the \$500,000 BCRLF in 1999. The Wayne County Brownfield Redevelopment Authority (WCBRA) is the lead agency for the pilot. AKT Environmental Consultants, Inc. (AKT) has provided support for the County's assessment pilot and will continue in this role for the BCRLF. Wayne County has a strong economic development approach to its brownfields redevelopment and has established a creative link between the BCRLF and the Assessment Pilot by selecting a test site that will utilize both programs. This combination will allow the project to share NCP related documentation that was already required for the assessment portion of the project. In addition, WCBRA's use of an environmental engineer, who is also involved with the assessment project, will help to ease the administrative requirements of the BCRLF.

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WCBRA's proposed project is a blighted industrial building located in the City of Hamtramck. WCBRA utilized the assessment pilot program in order to conduct Phase 1 and Phase II environmental site assessments at the site. WCBRA is proposing to use the BCRLF to complete cleanup and demolition for this site. Wayne County and the City will use Brownfields Redevelopment Authority to establish Tax Increment Financing (TIF) to repay the revolving loan. The EDC will borrow \$350,000 from the BCRLF to fund the site cleanup. Wayne County has also expressed an interest in applying for additional funds for municipalities within the County, to be managed by the WCBRA. However, it should be stressed that Wayne County believes that the continued ability to use BCRLF along with the assessment program will be crucial to the continued success of the BCRLF.

WEST CENTRAL MUNICIPAL CONFERENCE (WCMC), IL

WCMC was awarded the \$350,000 pilot BCRLF funds in 1997. The GLEFC identified three primary strengths of the loan fund as it relates specifically to the WCMC's ability to use the program. First, the loan fund should be easy to use given that the State of Illinois will handle the administration of the loan fund. The State of Illinois is already well-versed in administering loan funds and is currently preparing for its own administration of a separate brownfields revolving loan fund as well as the BCRLF for the Illinois EPA.

Secondly, a loan from the BCRLF can be made directly to a private borrower, unlike many other public financing sources. Given this unique feature, the GLEFC believes this is a distinct advantage for the WCMC to use in its relationship with local bankers on the boards of both the WCMC as well as the West Cook Community Development Corporation, a related but separate entity to the WCMC. Finally, WCMC's experience with its communities utilizing tax increment financing (TIF) as a way to pay back borrowed funds for brownfield redevelopment gives the WCMC in a 'knowledge advantage' when promoting the

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BCRLF. WCMC is in a unique position to call upon its members as resources to target and market this tool for meaningful brownfield redevelopment.

Appendix C: Site Visit and Research Interviews

The following lists the BCRLF pilot community site visit participants and those others that were contacted over the course of the project period for their input and research information.

Site Visits

1. Indiana Department of Environmental Management

February 1, 2000

Kyle Hendrix, Environmental Manager, IDEM
Michele Oertel, Senior Environmental Manager, IDEM
Dana Reed-Wise, Chief, Site Assessment and Brownfields Program, IDEM
Linda Morgan, EPA Region 5
Deborah Orr, EPA Region 5
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

2. City of Indianapolis

February 1, 2000

Jim Joven, Brownfields Coordinator, City of Indianapolis
Deborah Orr, EPA Region 5
Linda Morgan, EPA Region 5
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

3. State of Illinois, EPA

February 22, 2000

Steve Colantino, Illinois EPA
Gary King, ILEPA
Mike Charles
Deborah Orr, EPA Region 5
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

4. City of Chicago, Illinois

February 23, 2000

David J. Reynolds, Deputy Commissioner
Brooke Furio, EPA Region 5
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

5. West Central Municipal Conference (Illinois)

February 23, 2000

Michael McMahon, Director, Community Development
Brooke Furio, EPA Region 5
Deborah Orr, EPA Region 5
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

6. Minnesota Pollution Control Agency

April 13, 2000

Gary Krueger, MPCA
Jonathan Smith, MPCA, Duluth Office
Doug Beckwith, MPCA, Duluth Office
Bob Palmquist, the NorthSpan Group, Duluth
Jane Neumann, U.S. EPA Region 5
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

7. Hennepin County, Minnesota

April 13, 2000

Catherine Geisen-Kisch, Planner
Brooke Furio, EPA Region 5
Adina Wolf, GLEFC

8. Cuyahoga County, Ohio

May 11, 2000

James Herron, Brownfield Development Specialist, Department of Development,
Cuyahoga County
Virginia Aveni, Environmental Program Manager, County Planning Commission
Ted Smith, EPA Region V
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

9. City of Detroit, Michigan

May 17, 2000

Sarah D. Lile, Director Environmental Affairs, City of Detroit
Willa J. Williams, Administrative Supervisor, Environmental Affairs, Detroit
Guy P. Hoadley, Supervising Assistant Corporate Counsel, City of Detroit
Ross Powers, EPA Region V
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

10. Wayne County, Michigan

May 17, 2000

Al Bogdan, Wayne County Brownfield Redevelopment Authority (WCBRA)
Marge Whittemore, Wayne County Economic Development Authority
Tony R. Anthony, Director, Environmental Engineering Services, AKT
Environmental Consultants, INC
Ross Powers, EPA Region V
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

11. Battle Creek, Michigan

May 18, 2000

Michael Buckley, City of Battle Creek Department of Public Works
Cheryl Mead, Downtown Development Director, Battle Creek Unlimited Inc
Alan Baumann, EPA Region V
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

12. City of Columbus, Ohio

May 23, 2000

Gary R. Cavin, Assistant Director, Dept. of Trade and Development
Ross Powers, EPA Region 5
Kirstin Toth, GLEFC
Adina Wolf, GLEFC

Research Interviews:

For EPA general background, regional information, comparative programs and BCRLF loans made:

Federal Headquarters, EPA
Timothy McProuty, Environmental Finance Program

Region 1
Lynne Jennings, BCRLF Coordinator

[for Region 2]
Michelle Christina, City of Trenton Department of Housing & Development

Region 3
Stephanie Dehnhard, Project Manager
Sherry Gallagher, project Manager

Region 4
Max Kimpson, Project Manager

Region 6
Stan Hitt, Regional Brownfields Coordinator

Region 7
Susan Klein, Regional Brownfields Coordinator
Debi Morey, Brownfields Project Manager

Region 8
Kathie Atencio, Regional Brownfields Coordinator
Tom Pike, BCRLF Coordinator

Region 9
Tom Mix, Project Manager

For additional state program information:

Indiana

Dana Reed Wise, Chief, Brownfields Program, Indiana Dept. of Environmental Management
Greta Hawvermale, [formerly with] Indiana Development Finance Authority (IDFA)
Courtney Tobin, IDFA

Illinois

Gary King, IL EPA
Steve Colantino, IL EPA
Dave Reynolds, City of Chicago

Minnesota

Meredith Udoibok, Department of Trade & Economic Development (DTED)
Jeff Freeman, DTED
Bob Palmquist, Business Development Specialist, The NorthSpan Group, Duluth, MN

Ohio

Jim Bonk, Ohio EPA, Environmental Finance Division
Steve Grossman, Ohio Water Development Authority

ABOUT THE URBAN CENTER

The Urban Center is a nationally recognized source of policy research, technical assistance, and training services on urban and regional development issues. As the research arm of the Maxine Goodman Levin College of Urban Affairs at Cleveland State University, the center serves the urban community and the region as a resource for the investigation of policy issues and provides assistance to community leaders in addressing current challenges.

The center's programs and initiatives offer applied research, technical assistance, strategic planning, and training to public officials, community leaders, and the private sector with the objective of enhancing the quality of life in urban communities. The center also has expert capacities in geographic information systems, leadership development, communications technology, survey research, and data resources. The Urban Center provides leadership for the collaborative research and public service goals of the Ohio Board of Regents' Urban University Program (UUP).

The Urban Center employs over thirty professional staff members and provides graduate assistants and undergraduate students with an opportunity for experiential learning. In addition to its own agenda, the Urban Center supports the research and training projects of the college faculty.

For further information on the Urban Center and its activities, please contact Larry Ledebur, Director, The Urban Center, Levin College of Urban Affairs, Cleveland State University, 1737 Euclid Avenue, Cleveland, Ohio 44115.

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