



Date: May 26, 2016

To: The Honorable John Shimkus,

From: Clark Henry, CIII Associates

Re: Response to additional questions following April 21, 2016 testimony to Subcommittee on Environment and the Economy

Representative Shimkus,

Thank you for following up with an additional question following my April 21, 2016 testimony to the Subcommittee on Environment and the Economy. It was a great honor to address yourself and the other representatives about the EPA Brownfields Program. I have provided my response to your question below in the prescribed format. Please just let me know if there is anything else I can do to help you or the Subcommittee.

- 1) Subcommittee Member question: John Shimkus, Chairman Subcommittee on Environment and The Economy
- 2) Question: **Please explain the need for area-wide planning. Can you walk us through what it means and why you believe it is important to make it a permanent feature of the EPA Brownfields Program?**
- 3) The need for Brownfield Area Wide Planning (BFAWP) is driven by the unfortunate reality that brownfields and their negative impacts are not isolated to individual properties. They compromise public health, economic development potential, and environmental quality on a broader scale such as entire districts, communities, blocks, and corridors. Whether they are contaminated or not, individual brownfield properties represent potential health threats, unquantified risk to developers and investors, and create an unfavorable atmosphere for investment in the surrounding area. Where developers and investors shy away from brownfields, they do the same to the properties next to and in proximity to them. The resulting domino effect creates disinvestment in entire areas that would otherwise accommodate commercial, office, and industrial businesses, housing, critical public facilities, and more.

Through BFAWP a local jurisdiction can conduct research (Existing conditions, market studies, and development capacity, etc.), stakeholder engagement, partnership development, and create implementation strategies for local and private investment that queues up development and investment on a scale broader than site by site planning. It prepares entire districts for investment rather than individual properties, effectively amplifying the ability of federal resources to leverage local public investment and private capital.

Though there is a brownfield twist, this type of activity is not necessarily new to planning and development professionals but it is activity whose demand is far greater than the supply of





resources to conduct it. This unmet demand is especially acute in small and rural municipalities whose local government capacity is limited or in communities in larger cities that do not have access to economic development resources such as Tax Increment Financing or substantial local tax revenue. The EPA BFAWP program provides them with access to resources that otherwise do not exist, and without them they continue suffering stagnated economic growth, exacerbated environmental and public health impacts, low employment, and underperforming public facilities.

By focusing on brownfields as development opportunities (which they are), rather than as a liability, BFAWP helps local municipalities demonstrate their commitment to a district, which is an essential element for private capital and community support alike. The EPA has been very clear to grant recipients that BFAWP is not a tool with which to create plans that sit on a shelf. This is a resource that helps towns and cities marshal local resources to create a path forward in partnership with the private and nonprofit sectors.

Making BFAWP a permanent part of the EPA Brownfield Program is important because the demand for the continued success of the current BFAWP resources is far from being met. If not made a permanent part of the EPA Brownfield program the compelling outcomes of this program will likely be limited as federal administrations change and discretionary resources reallocated. If there is a benefit to rotating administrations, different approaches, and priorities it is that we can keep the best ideas and practices offered by each rotation and leave the rest behind. The BFAWP program may very well represent the best of what has been introduced to the EPA Brownfield Program in this current administration. We should hang on to it. Further, BFAWP demonstrates that the federal government can evolve and shape its resources in response to what works best at the local level, speak to issues critical to all parties along the political spectrum, and realize environmental, economic, and social gains together.

If you or your colleagues have any additional questions or if there is a way in which I can assist you regarding reauthorization for the EPA Brownfield Program, making the BFAWP program permanent, or any other matter please just let me know. Again, it was an honor to address you last month and I thank you for your service and leadership.

Sincerely,

Clark Henry

