



R05-25-A-053

CITY OF MANITOWOC

WISCONSIN, USA

www.manitowoc.org



Per grant application requirements, the following identifies the applicant and contact for communication with USEPA:

1. Applicant Identification

- a. Name of Applicant: City of Manitowoc
- b. Address of Applicant: 900 Quay Street; Manitowoc, WI 54220

2. Website URL: <https://www.manitowoc.org/>

3. Funding Requested

- a. Assessment Grant Type: Community-Wide
- b. Federal Funds Requested: \$500,000

4. Location

- a. City: City of Manitowoc
- b. County: Manitowoc County
- c. State: State of Wisconsin

5. Property Information for Site-Specific Proposals: *Not Applicable*

6. Contacts

a. Project Director	b. Highest Ranking Elected City Official
Adam Tegen Community Development Director 900 Quay Street Manitowoc, WI 54220 ategen@manitowoc.org (920) 686-6931	Justin Nickels Mayor of the City of Manitowoc 900 Quay Street Manitowoc, WI 54220 jnickels@manitowoc.org (920) 686-6980

7. General Population (2022 US Census Bureau Estimate)

- a. City of Manitowoc = 34,500

8. Other Factors Checklist

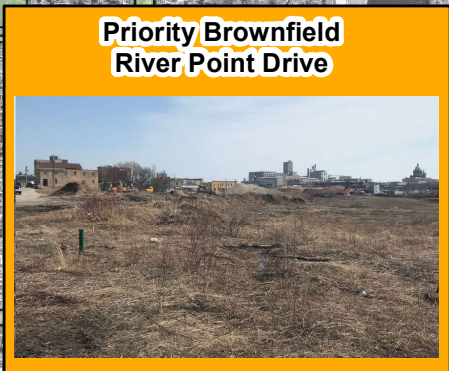
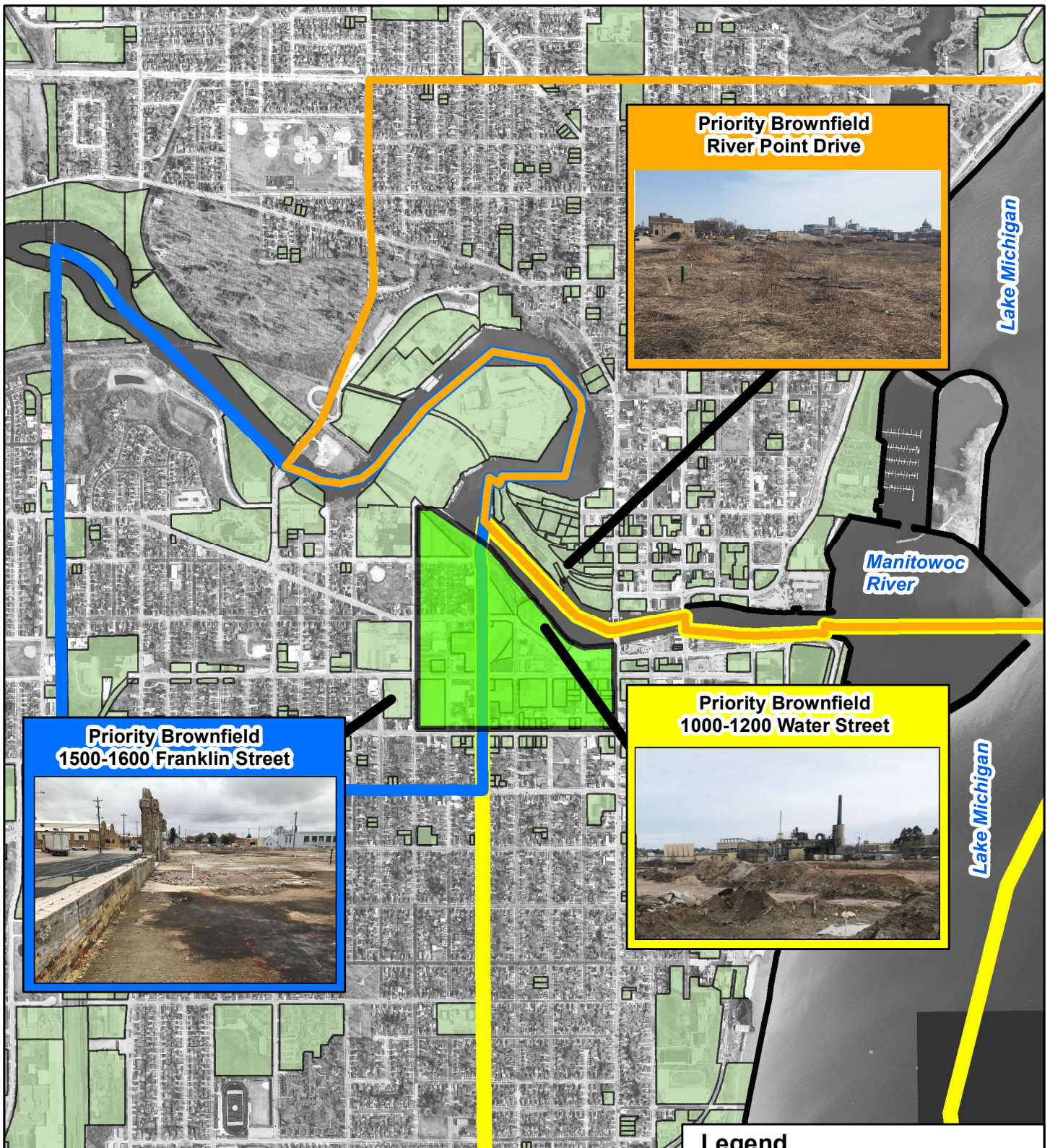
Other Factors	Page #(s)
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	P.1 Attached Map
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	P.2
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	P.2
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B. , for priority site(s) within the target area(s).	
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	

9. Letter from the State Environmental Authority

See attached letter from the Wisconsin Department of Natural Resources

10. Releasing Copies of Applications

Not Applicable



Target Areas and BBSC Franklin Street Project Area

Priority Brownfields
River Point Drive
1000-1200 Water Street
1500-1600 Franklin Street
City of Manitowoc, Wisconsin



0 0.275 0.55 Miles



Legend

- Building Blocks for Sustainable Communities (BBSC) - Franklin Street Project Area
- Census Tract 4 Target Area
- Census Tract 5 Target Area
- Census Tract 8 Target Area
- Potential Brownfields (n=688)



November 8, 2024

Adam Tegen
Director, Community Development
City of Manitowoc
900 Quay Street
Manitowoc, Wisconsin 54220
Via Email Mail Only to ategen@manitowoc.org

Subject: State Acknowledgement Letter for City of Manitowoc
FY25 EPA Community-Wide Assessment Grant

Dear Adam Tegan,

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

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

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

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

Sincerely,

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

cc:

Tauren Beggs, DNR NER – tauren.beggs@wisconsin.gov
Harris Byers, Stantec – harris.byers@stantec.com

1.a. Project Area Description and Plans for Revitalization – Target Area and Brownfields

(1.a.i) Overview of Brownfield Challenges and Description of Target Area. The City of Manitowoc (City), Wisconsin is located on the western shoreline of Lake Michigan at the confluence of the Manitowoc River (the [River](#)). Development in Manitowoc began in the early 1800s by European settlers for agricultural, fishing, lumber, and shipbuilding. Settlement was followed in the late 19th and early 20th centuries by large-scale industrial development in Census Tract 55071000400 (CT-4), Census Tract 55071000500 (CT-5), and Census Tract 55071000800 (CT-8), including a 20-acre railroad port/yard, riverfront grain elevators and malting companies, tanneries, and metal works/foundry operations. The railroad port of Manitowoc (located in CT-4) facilitated export of aluminum/leather goods (made in CT-5) and grain/malt (processed in CT-8) into the greater Lake Michigan shipping corridors, resulting in rapid industrial growth and economic prosperity in the area through the 20th century. Sadly, the City's industrial sector collapsed in the 1970s due to offshoring and market conditions. The 1,662 acres of the once-prosperous maritime community within these census tracts is now littered with 632 acres of potential brownfields, including abandoned rail and petroleum distribution infrastructure, dilapidated industrial facilities, empty commercial buildings, drycleaners, gasoline stations, and other vacant/underutilized lots. The combined industrial collapse within CT-4, CT-5, and CT-8 (herein the **"Target Areas"**) created an abundance of brownfields that represents over 23% of the City by area, an 11% decrease in population and a 34% increase in poverty in the past two decades, and a 72% decrease in manufacturing jobs since 2010, which is why redevelopment of these once thriving areas of the City is critical. The City has identified more than 688 potential brownfields throughout Manitowoc, with 56% located in the Target Areas (Table 1). Brownfields in the City have led to significant blight and environmental impacts, poor economic conditions, psychological drain, and a welfare risk to the community as described in Section 2.a. The proximity of the Target Areas to the River and to downtown makes redevelopment especially attractive to the underserved Target Area communities seeking relief from long-endured hardship. However, while the density of brownfields in these Target Areas allows for meaningful and strategic growth, the City is not capable of addressing the insurmountable financial challenges posed by this project without assistance from the USEPA Brownfield program. As described in Section 1.b.(i), a collection of reuse Plans will guide this project. The greatest project needs to be addressed by redevelopment of priority brownfields with the aid of this grant are (1) increased residential workforce and low-to-moderate income (LMI) housing options to support rebuilding the downtown commercial districts; (2) expanding attractive and diverse commercial opportunities for small business growth; and (3) increasing greenspace and local multi-modal trail networks to connect the community to the River and maritime heritage.

Table 1. Target Areas	Potential Brownfields
CT-4	172 Parcels (132 acres)
CT-5	91 Parcels (225 acres)
CT-8	123 Parcels (275 acres)

(1.a.ii) Description of the Priority Brownfield Sites. As noted on Table 2, three **"Priority Brownfield Sites"** pose known risks to human health and the environment from hazardous substances and petroleum spills. Redevelopment of these three priority brownfield sites represents the greatest potential to add workforce and LMI housing, appealing retail amenities, and increase greenspace connecting local and regional trails along waterways, which is why these brownfield sites are priorities for environmental site assessment (ESA), site investigation (SI), and remedial action planning (RAP).

Table 2. Priority Brownfield Sites Summary

River Point Drive (CT-4) 23 parcels 21 acres	Past use: Railroad yard & port, bulk petroleum storage, warehousing (20 th century). Blighted in 21 st century. Current use: Most 20 th century buildings razed. Area is undergoing residential/commercial redevelopment. Environmental concerns: Documented VOCs, PAHs, metals, PCBs & cyanide from historic fill and past uses. Grant funding needs/outcomes: SI & RAP are critical to prepare Site for proposed mixed-use redevelopment.
1500-1600 Franklin Street (CT-5) 2 parcels, 4 acres	Past use: Tannery (19 th century), heavy aluminum manufacturing (20 th century). Blighted in 21 st century. Current use: All 19 th & 20 th century buildings razed. Currently vacant and slated for residential redevelopment. Environmental concerns: Documented VOCs, PAHs, metals & PCBs from past use & dielectric fluid release. Grant funding needs/outcomes: SI & RAP to prepare Site for proposed, greatly needed workforce housing.
1000-1200 Water Street (CT-8) 4 parcels 6 acres	Past use: Dye house (19 th century), grain elevator, malting company, food processing plant (20 th century). Current use: 49,700 sq. ft smoke flavor manufacturing plant, reducing production/vacating to another location. Environmental concerns: Documented VOCs, PAHs, metals & PCBs from past/current industrial uses. Grant funding needs/outcomes: Phase II ESA/SI & RAP to characterize Site conditions & focus development.

Shading indicates site is adjacent to the River. PAH = polycyclic aromatic hydrocarbon; PCB = polychlorinated biphenyl; VOC = volatile organic compound

(1.a.iii) Identifying Additional Sites. The City's Brownfields geographic information system (GIS) database will be updated as part of this project to identify additional brownfield sites. If grant funds remain after addressing the priority brownfield sites, the GIS database will be used to identify/rank additional sites within the geographic scope described in Section 1.a.(i). for prioritization using the City's current prioritization rubric, which has been developed/refined over the

Target Areas: Census Tract 4 (CT-4); Census Tract 5 (CT-5), Census Tract 8 (CT-8). **Select acronyms:** BBSC = Building Blocks for Sustainable Communities; LMI = low-to-moderate income; TID = tax incremental financing district; WDNR = Wisconsin Department of Natural Resources

past decade and shown to be highly successful in facilitating meaningful redevelopment. The rubric includes detailed ranking criteria to assess: (1) if site is located in a disadvantaged community/census tract (as identified by CEJST); (2) eligibility for assessment based on USEPA requirements; (3) site significance relative to achieving existing planning/reuse strategies and priorities; (4) willingness of property owners to partner with the City on environmental studies and provide access; (5) marketability of the site and the potential for redevelopment emphasizing multi-family residential, commercial, and underserved community stabilization; (6) extent and/or perception of contamination threatening public health and/or the environment and hindering development; and (7) potential positive impact on the surrounding community to be realized via site reuse. To provide for continued input from the community, the City's existing Brownfields Advisory Committee (BAC; Section 2.b) will be involved in site identification and prioritization.

1.b. Project Area Description and Plans for Revitalization – Revitalization of the Target Area

(1.b.i) Reuse Strategy and Alignment with Revitalization Plans. The *City of Manitowoc Comprehensive Plan*, the *Manitowoc River and Trail Corridor Plan*, the *Tax Increment District No. 22 (CT-4)*, *No. 16A (CT-5)*, and *No. 19 (CT-8) Project Plans*, the *Downtown Master Plan*, and the *Downtown Parking Analysis*, along with the *Revitalizing the Franklin Street Area* plan prepared as part of the USEPA Office of Community Revitalization 2024 Building Blocks for Sustainable Communities (BBSC) program (collectively referred to herein as the “Plans”) will guide the project. This reuse strategy is in direct alignment with community priorities and needs, as expressed by community members during public meetings held during development of the *Plans*. The underserved community struggles with severe lack of housing in the downtown area and lack of diverse commercial/recreational amenities; therefore, common established goals for these priority brownfield sites include providing **affordable multi-family housing, generating business opportunities that stabilize the area, and enhancing recreational opportunities through connectivity with multi-modal trails.**

- In alignment with these goals, reuse plans and strategies for Target Areas include desperately needed multi-family housing redevelopment (market rate and LMI) at each of the three priority brownfield sites. Redevelopment of all three priority brownfield sites will additionally include extending the multi-modal trail networks along the River. Commercial/mixed-use redevelopment is also proposed for the priority brownfield sites in CT-4 and CT-8.
- The proposed reuse strategy aligns with the goals of the Plans for revitalization and land use of expanding multi-family housing, attracting a variety of new businesses to the Target Areas, and improving access to the River with the addition/extension of greenspace and trails.
- The reuse strategy also reflects the priorities of the community. As part of the BBSC program, the City formed a local steering committee and hosted a multi-day workshop attended by residents, nonprofits and small business owners to identify key issues and develop sustainable solutions to address their challenges in the “Franklin Street Area”, which includes the priority brownfield sites in CT-5 and CT-8. Goals identified by members of the community as part of the BBSC program include creating workforce housing, improving access to the River, and improving multimodal transportation connections.

(1.b.ii) Outcomes and Benefits of Reuse Strategy. The proposed projects will stimulate economic development via new and/or adaptive residential, commercial, and recreational reuses. The City's revitalization plans are designed to protect the community and their investments and will not cause the displacement of existing residents or businesses. The following are benefits/outcomes that will be generated with this reuse strategy.

- Increase affordable workforce and LMI housing options: Finalized redevelopment plans for the three priority sites include constructing 250 multi-family apartment/townhome/condominium units in the Target Areas to address the City's workforce and LMI housing burden. All new construction will incorporate energy efficiency measures to qualify for Leadership in Energy and Environmental Design (LEED) certification. Studies indicate that buildings constructed to LEED standards contribute 50% fewer greenhouse gases compared to conventional construction¹.
- Support adaptive residential reuse, commercial reuse & energy efficiency projects: Several brownfields in the Target Areas are ideal for adaptive residential (workforce/LMI) and/or commercial reuse to highlight historic preservation and sustainable building redesign. These measures include new high-efficiency heating systems, replacement of single pane windows and electrical upgrades. New construction will incorporate innovative energy efficiency technologies, including air source heat pumps and hybrid water heater systems. The goal will be to have all LEED certified buildings.
- Expanding multi-modal trail to support communities & nature-based climate solutions: Redevelopment of the priority brownfield sites in CT-4, CT-5 and CT-8 will include the creation of new public greenspaces along the River, including the expansion of the multi-modal trail networks on both sides of the River. The proposed addition of ~2 miles of new trails will connect the priority brownfield sites to the regional trail network and increase recreational opportunities for the community. The creation of these public greenspaces additionally represents a nature-based solution for improving resilience to climate change in the Target Areas.

¹ U.S. Green Building Council, Inc. <https://www.usgbc.org/articles/role-leed-climate-change-mitigation>

Target Areas: Census Tract 4 (CT-4); Census Tract 5 (CT-5); Census Tract 8 (CT-8). **Select acronyms:** BBSC = Building Blocks for Sustainable Communities; LMI = low-to-moderate income; TID = tax incremental financing district; WDNR = Wisconsin Department of Natural Resources

1.c Project Area Description and Plans for Revitalization – Strategy for Leveraging Resources

(1.c.i) Resources Needed for Site Reuse. Leverage and coordinated public funding are cornerstones of the Manitowoc brownfields program. The City is eligible for a broad array of federal, state, and local funding sources to support reuse of brownfield properties. Many of the funding sources below have been used to support assessment, cleanup, and reuse of brownfields in Manitowoc. This grant will provide a catalyst for securing external funds as “match” for state grants.

Eligible and Secured – Tax Incremental Financing District (TID). Perhaps the most important sources of funding are TIDs which can be used for environmental cleanup, demolition of buildings and infrastructure improvements needed to support redevelopment of brownfield sites. The City has 9 active TIDs valued at **\$246,781,400** available to support redevelopment in Manitowoc. Of note, the City is prepared to leverage TID 16A (CT-5) and TID 19 (CT-8) to support redevelopment of priority brownfield sites (estimated combined value of **\$73,271,600**). TID 22 (CT-4) remains healthy and **\$12,000,000** was used from 2021-2024 for infrastructure construction at the River Point District.

Eligible and Potential – State Funding. The City of Manitowoc will pursue (and support developers in pursuing) funding from potential State resources, including 1) Wisconsin Economic Development Corporation (WEDC) Wisconsin Assessment Monies [assessment], Site Assessment Grants [assessment], Cleanup Grants [cleanup] and Startup Grants [reuse]; 2) Wisconsin Department of Natural Resources (WDNR) [cleanup loans/grants; reuse]; and 3) Non-profits (e.g., Fund for Lake Michigan; reuse). State grants require a match, which is impossible to fund internally. As demonstrated with the City’s FY21 Coalition Assessment, assessment outputs achieved by this grant (described in Section 3.a) **will serve as the match to secure at least one \$150k State brownfield assessment grant per year.**

Eligible and Potential – Insurance Recovery. The City will investigate historic insurance policies that may have resources available to pay for assessment and remediation of impacts at brownfield properties. Insurance recovery investigations are currently underway at the priority brownfield site in CT-5.

(1.c.ii) Use of Existing Infrastructure. The Target Areas are among the oldest developed areas in the City which are well-served by existing infrastructure (water, sewer, electric, natural gas, etc.). Reuse and leveraging strategy of existing infrastructure for each priority brownfield site is summarized on **Table 3** below.

Table 3. Priority Brownfield Sites Reuse and Leveraging Strategy of Existing Infrastructure	
River Point Drive (CT-4)	Under TID 22, the City invested \$12 MM from 2021 through 2024 for constructing 4,000-linear feet of several <u>new roadways</u> (River Point Drive, Buffalo Street, & N 11 th Street) and <u>new utilities</u> servicing this site. The City will additionally bond \$7MM for road and utility work in 2025-2026.
1500-1600 Franklin St (CT-5)	Under TID 16A, The City has budgeted \$1,300,000 to rebuild the east- and west-adjacent roads (S 15 th and 16 th Streets), <u>including new utilities</u> that will service this site (installed concurrent with proposed development). New construction designs will beneficially utilize existing foundations.
1000-1200 Water St (CT-8)	The City invested more than \$3 MM in stormwater infrastructure in the early 2000s to mitigate flooding in CT-8, including a new stormwater outfall at this site. <u>Utilities with industrial capacity</u> currently service the site and are suited for a variety of future mixed-commercial/residential reuses.

Future infrastructure investments at the priority brownfield properties will include expansion of utilities and/or road/transportation projects, which can be accomplished using Wisconsin Department of Transportation, local TID, and/or City funding. This project will leverage **\$1,166,000** in recent drinking water infrastructure upgrades funded through the *American Rescue Plan Act of 2021* and installed due to drinking water issues caused by contaminated groundwater. The City was recently awarded **\$8,200,000** to replace lead service lines in the City, including the Target Areas, which will directly improve water quality and ensure clean drinking water for new developments. Washington Street (CT-5 & CT-8) was repaved in 2024 (**\$480,000**) and Franklin Street (CT-5 & CT-8) will be reconstructed in 2025, including new utilities, leveraging **\$1,750,000** in infrastructure investment. New bridges/sidewalks were constructed along the River (CT-4) to enhance the walkability in the downtown corridor (**\$102,000**). Additional community-wide leverage includes investments made by the City, such as better integration of bikeable and walkable streetscapes.

2.a. Community Need and Community Engagement – Community Need

(2.a.i) The Community’s Need for Funding. This grant will meet the needs of a community that has an inability to draw on other sources of local funding to conduct investigations due to a small population and low income resulting from job losses, compounded by restricted state/local funding. Key indicators of community need are summarized on **Table 4** (next page). The comparison from 2000 to 2022 shows the continuous decline the community has endured and has been unable to resolve over the past couple decades, even a half-century **after** the collapse of the manufacturing sector in the 1970s. The Target Areas have each seen a **decrease in population, increased rates of poverty, and reduced educational attainment in 2022** – all while household incomes, home values, and market availability for homeownership and rental have stagnated.

Table 4. Indication of Community Need ²	Target Areas			Local, State & National Comparisons			
	CT-4	CT-5	CT-8	City	County	State of WI	US
Population (% change since 2000)	3,825 (- 17 %)	3,082 (- 1 %)	4,060 (- 13 %)	34,500 (+ 1 %)	81 K (- 2 %)	5.9 M (+ 10 %)	331 M (+ 18 %)
%Poverty rate (% change since 2000)	18% (+ 10 %)	17% (+ 8 %)	24% (+ 17 %)	15% (+ 7 %)	10% (+ 4 %)	11% (+ 2 %)	13% (+ 0 %)
% Families in deep poverty	7%	9%	5%	4%	3%	3%	4%
Mean household income	\$ 58,092	\$ 42,319	\$ 62,260	\$ 60,040	\$ 66,412	\$ 72,458	\$ 75,149
% Housing built in 1939 or earlier	77%	71%	61%	33%	31%	18%	12%
% Homes <\$100,000 value	19%	74%	39%	30%	22%	11%	13%
% Vacant housing for sale/rent	1.2%	0.0%	0.5%	2.3%	1.3%	1.9%	2.5%
High school graduate (only)	27%	42%	46%	35%	37%	30%	26%
Bachelor's degree or higher	27%	14%	21%	25%	23%	32%	34%

Underlined indicates worse conditions than City/County; **BOLD & RED** is worse than WI and/or US; **shading** indicates worse than all locational comparisons

Small population. A limiting economic factor is the City's lack of "entitlement status"; therefore, the City does not receive an annual allocation of CDBG funds that could be a key source of assessment funding. The population has been shrinking in each of the Target Areas since 2000 (ex. -17% in CT-4). While the City's population of 34,500 is fairly small, it is too large to receive US Department of Agriculture brownfield funds.

Job loss. Manitowoc has experienced many economic challenges with globalization and its impact on the manufacturing sector. Rising global competitiveness and offshoring to reduce labor costs resulted in major job losses. For example, when the facility in CT-5's priority brownfield site closed in 1986, the initial economic impact was the loss of \$19,000,000 in annual wages and benefits associated with the 1,150 eliminated manufacturing jobs. In the Target Areas, the number of jobs in manufacturing held by residents has plummeted by 72% in the past decade from 4,089 manufacturing jobs in 2010, to 1,144 manufacturing jobs². Continued job loss has resulted in significantly decreased local tax revenue that would otherwise be available to complete brownfield assessments.

Low Income. Loss in jobs due to the decline of the manufacturing sector has resulted in a loss in reliable income for residents within the Target Areas. Average household incomes for all Target Areas are less than local, state and national comparisons, and the households in CT-5 bring home less than 2/3 of the income of the average County household. As a symptom of low income, 17 to 24% of the residents within the Target Areas are living below the poverty line. Nearly one in four of the 4,000+ residents within CT-8 are living in poverty, which represents a 17% increase in poverty rate since 2000. Depressed economic conditions have reduced educational attainment, which could explain why the percentage of households considered to be in deep poverty (cost-burdened) in the Target Areas is up to double the rate for the City or County. Proposed redevelopment will aid in improving the poor economic conditions of the community.

Limited funding. The City's inventory identified 386 brownfields within the combined Target Areas that today represents over 23% of the City by area. Using costs from the City's FY21 Coalition Grant, it will cost \$22MM just to complete the first two phases of due diligence at these sites, **which equal the entire 2025 tax levy of the City**. Municipal funds are restricted by law for designated purposes, and lenders would not fund assessment without egregious terms.

Desperate need for new, quality housing. Housing scarcity is a resounding issue in the Target Areas, with low availability CT-4 and CT-8 (1.2% and 0.5%, respectively; less than half of availability in the rest of the City) and with **no (0.0%) vacant housing available for rent or sale in CT-5 in 2022**. Moreover, the housing that exists in the Target Areas (presently occupied near-capacity) is aging and low-value. For example, 74% of homes in Target Area CT-5 are valued at less than \$100,000 and represent some of the oldest infrastructure in the City, with 71% of the homes in CT-5 being built prior to 1940. With these prevalent low valuations, revenue from property tax is not a viable source of funding for the City to complete assessment, remediation, and reuse of brownfields in the Target Areas. Proposed redevelopment will address housing insecurity for LMI families, increasing availability of new, healthy housing.

(2.a.ii.1) Threats to Sensitive Populations – Health or Welfare of Sensitive Populations. As noted in Section 2.a.i and further summarized on Table 5, the USEPA Environmental Justice Screening (EJScreen) tool noted the demographic index of the Target Areas ranks in the upper 80th and 90th percentiles compared to the State due largely to the high percentage of low-income populations, suggesting a high exposure risk to sensitive populations. The Target Areas rank in the 97th and 93rd percentiles in

Table 5. Sensitive Population (State %) ³	Target Areas		
	CT-4	CT-5	CT-8
Demographic Index	92	90	86
Low Income	97	93	89
Linguistic Isolation	76	98	81
< HS Education	94	98	92
Under 5 Years Old	95	94	40
People of Color	86	90	80

Bold indicates ≥ 80th percentile; **RED** ≥ 90th percentile (WI)

² Data from policymap.com based on American Census Survey, 2018-2022.

³ Data from <https://ejscreen.epa.gov/mapper/> Version 2.3

Target Areas: Census Tract 4 (CT-4); Census Tract 5 (CT-5), Census Tract 8 (CT-8). **Select acronyms:** BBSC = Building Blocks for Sustainable Communities; LMI = low-to-moderate income; TID = tax incremental financing district; WDNR = Wisconsin Department of Natural Resources

Wisconsin for low income in CT-4 and CT-5, 98th percentile for linguistic isolation in CT-5, and in the 92nd percentile or greater for low education across all Target Areas. Multi-generational poverty is difficult to overcome. As noted on **Table 6**, nearly three out of five single mothers with children are living in poverty in CT-5, and child poverty is more than **triple** the rate of the State in CT-8. More than **one third of individuals with a disability live in poverty** in CT-4, and 8% to 24% of people over 65 live in poverty, **triple the State poverty rate for the elderly** in CT-5. Over 30% and 60% of the City's total Hmong and Hispanic populations, respectively, reside within the combined Target Areas, and **65% of Hispanic people are living in poverty** in CT-8. The economic conditions suffered by sensitive populations could explain why 11% to 18% of families living in the Target Areas are receiving Supplemental Nutrition Assistance Program (SNAP) benefits, compared to 8% County-wide².

Table 6. Percent of Sensitive Populations & Poverty Rates ²	Target Areas			Local Comparisons	
	CT-4	CT-5	CT-8	City	State of WI
Elderly (65 and older)	17%	10%	16%	22%	18%
Elderly in poverty	12%	24%	8%	14%	8%
Disabled	16%	14%	17%	15%	12%
Disabled in poverty	36%	15%	23%	27%	21%
Single mothers	8%	18%	29%	15%	9%
Single mothers in poverty	34%	58%	43%	44%	30%
Children (< 18 years)	20%	29%	21%	22%	22%
Children in poverty	27%	15%	45%	21%	13%
Hispanics	9%	5%	10%	6%	7%
Hispanics in poverty	16%	0%	65%	26%	18%

BOLD & RED indicates higher instance than WI; **shading** indicates higher instance than both City & WI

Lack of healthy housing. As discussed in Section 2.a.(ii), there is a significant need for healthy workforce and LMI housing. Housing stock is very old, with over 99% of homes in CT-4, and 91% in CT-5/CT-8 were constructed prior to the ban on consumer lead paint in 1978, which impacts children in the area and complicates finding healthy housing. Further, the median home value in the County (\$160,400) is nearly double the median home value in CT-5 (\$87,200), confirming that income is not fairly distributed and finding healthy housing, is an overwhelming challenge in the Target Areas. The Census Bureau estimates that upwards of 16% of homeowners and 33% of renters in the City are burdened by housing costs². This unfortunately forces sensitive populations to residential areas adjacent to the Target Areas and brownfields where lead-based paint is prevalent.

Food security and access. Obesity and food insecurity continue to be significant social justice issues in the Target Areas. CT-5 and CT-8 are considered a “Low Income, Low Access” areas by the US Department of Agriculture indicating community members travel more than 0.5 miles to the grocery store, which is difficult for sensitive populations who lack vehicle access². Directly impacting residents, WDNR issued a fish advisory for the Manitowoc River for PCBs, which are a constituent of concern at the priority brownfield sites⁴. The advisory is critical to the local Hmong (estimated population 1,421)⁵ as fishing is a popular sport but exposure risk is often not fully understood due to language barriers. Based on a nearby community study, there could be 910 Hmong residents in Manitowoc impacted by the fish advisory⁶.

Welfare improvement from grant/reuse strategy. Commercial/residential redevelopment in the Target Areas will improve welfare conditions by increasing healthy housing, directly addressing PCB contamination to improve fisheries, and increasing access to food. Well-being will be improved by increased access to green space and increased recreation.

(2.a.ii.2) Threats to Sensitive Pop. – Greater than Normal Incidence of Disease and Adverse Health Conditions.

Asthma. Although not available for the Target Areas, air quality is a significant issue in the region. Data from the American Lung Association *State of the Air 2024* report gives Manitowoc County an “F” for ozone pollution, putting residents with asthma (**10% of the County's population**) at risk who are especially vulnerable to illness and death from exposure⁷. The percentage of children in Manitowoc County with asthma is **50% greater** than the adjoining Sheboygan and Calumet Counties⁸, and the rate of adult asthma is **30% greater** in Manitowoc County compared to the National average⁹. Poor air quality undoubtedly has a disproportionate impact on sensitive populations, with ozone and particle pollution impacting 20% of children, 23% of elderly, and 11% of people of color living in the County⁷.

Lead exposure. The Wisconsin Department of Health Services (WDHS) *Childhood Lead Poisoning Data Explorer* indicates that 9% to 13% of children living in the Target Areas (birth to age 6) were lead poisoned between 2018 and 2021, **double to triple** the rates for the County and State¹⁰. Lead is a known constituent of concern in the Target Areas, with 91% to 99% of the housing being built prior to the ban on lead paint². Additionally, 4,721 lead water supply laterals totaling over 13 miles in length have been identified in the City, with a high density serving housing units in the Target

⁴ WDNR, *Fishing*, <https://dnr.wi.gov/topic/fishing/consumption/>

⁵ Herald Times, <https://www.htrnews.com/story/news/2021/05/10/manitowoc-second-wisconsin-city-celebrate-hmong-american-day-may-14/7354587002/>

⁶ Science Direct, *Hmong Fishing Activity and Fish Consumption*, <https://www.sciencedirect.com/science/article/abs/pii/S0380133094711631>

⁷ American Lung Association, *State of the Air* report, <https://www.stateoftheair.org/city-rankings/states/wisconsin/manitowoc.html>

⁸ WDHS *Public Health Profiles*, <https://www.dhs.wisconsin.gov/stats/pubhealth-profiles.htm>

⁹ CDC *Asthma Surveillance Data*, <https://www.cdc.gov/asthma/national-surveillance-data>

¹⁰ WDHS, *Childhood Lead Poisoning Data Explorer*, <https://dhsgis.wi.gov/dhs/clpde/>

Target Areas: Census Tract 4 (CT-4); Census Tract 5 (CT-5), Census Tract 8 (CT-8). **Select acronyms:** BBSC = Building Blocks for Sustainable Communities; LMI = low-to-moderate income; TID = tax incremental financing district; WDNR = Wisconsin Department of Natural Resources

Areas. The percent of disabled individuals with a cognitive disability in the Target Areas (e.g., 10% in CT-4) is **double** the rate for the State/US (5%)². Although the precise cause of cognitive disabilities in the disabled population is likely due to a multitude of factors, cumulative lead exposure is known to cause severe neurological damage.

Birth defects. Birth defect rates are not available for the Target Areas. The WDHS Manitowoc County Profile indicates the rate of congenital anomalies in the County is 1.0%, **twice the rate** suffered by children in the adjacent Brown County⁸.

Cancer rates. The National Cancer Institute indicates the age-adjusted incidence rates for melanoma, leukemia, non-Hodgkin lymphoma, and ovarian, uterine, bladder, renal, thyroid, lung, esophageal and prostate cancers are **all greater than State rates**¹¹. Poor health outcomes in the Target Areas could be associated with lack of health insurance as the uninsured rate (ex. 10% in CT-5) is **double** the County/State (5%)². Although the precise cause of identified poor health outcomes is likely due to a multitude of factors, known/suspect contaminants of concern identified at the Target Area brownfields are known to cause neurological damage and poor health outcomes summarized above.

Overall health. Although data for the Target Areas is not available, the *2022 Manitowoc County Community Health Assessment*¹² ranked Manitowoc County **54 out of 72 counties in Wisconsin for length and quality of life** based on a variety of factors and EJ parameters, including; physical environment (including air and water quality); social and economic factors (including education, income, and poverty); clinical care (including access, quality, and rate of uninsured); and health behaviors (including alcohol/tobacco use, obesity and food insecurity). Obesity remains a significant challenge in Manitowoc County and the Target Areas, with 18% of the low-income preschool children considered obese² and 32% of the adult population considered obese¹².

Reduction of health risk from grant/reuse strategy. Redevelopment of the Target Areas will mitigate these health conditions by decreasing contamination mass and source areas; increasing the quality of local fisheries by improving surface water quality; and increasing opportunities for healthy living as summarized in Section 1.b(ii) by creating new, healthy housing and recreation/transportation opportunities with new greenspace and multi-modal trails.

(2.a.ii.3.a) Environmental Justice (EJ) – Identification of EJ Issues.

In combination with zoning and persistent policies, pollution generated by former industrial operators has resulted in undue burden to sensitive populations (e.g., persons of color, persons with disabilities, and persons affected by persistent poverty) in the Target Areas. Those lacking formal education, single mothers in poverty, and children in poverty are especially threatened.

Table 7 summarizes the negative EJ impacts in the

Target Areas, a community disproportionately burdened with poor air quality (ozone, diesel particulate matter and toxic releases to air indices), with increased risk to children from lead exposure in housing (lead paint index), and abundant risks to water quality (Risk Management Plan [RMP] facility proximity and wastewater discharge indices).

Climate and Economic Justice. As noted in Section 1, equitable housing is one of the greatest needs in Manitowoc. Therefore, it is not surprising that the Climate and Economic Justice Screening Tool (CEJST)¹³ identified Target Area CT-5 as being **disadvantaged due to housing burden**, which is attributable to the older housing stock with a high lead paint risk compounded by housing cost burden, low income, and low education attainment of the community. CT-5 has an extensive legacy of industrial operations; therefore, it is not surprising the CEJST tool also identified CT-5 as further **disadvantaged due to legacy pollution** from its proximity to numerous hazardous waste sites.

Access and Food Security: 8% of the population of the County are in food-insecure households, and 7% of low-income County residents do not live close to a grocery store¹². Even more worrisome, 23% of high school students and 38% of middle school students in the County have reported experiencing hunger due to a lack of food at home¹². One food pantry five blocks from CT-5 is seeing overwhelming demand, distributing 3,500 pounds of food per day¹⁴, and BAC & BBSC steering committee member *Grow it Forward* operates another food pantry neighboring CT-8 that has distributed over 2,000,000 pounds of food since 2020¹⁵. These overwhelming demands are not surprising given the low income of the community. Lack of regular access to affordable healthy food may explain the rates of obesity and other health conditions for children and adults in the Target Areas alike.

Lack of Healthy Housing: The Target Areas are in desperate need of healthy workforce and LMI housing, as echoed

Table 7. EJ Index (State Percentile) ³ % in WI with lower risk versus Target Areas	Target Areas		
	CT-4	CT-5	CT-8
EJ Index - Ozone	91	87	87
EJ Index - Diesel Particulate Matter (in air)	89	87	82
EJ Index - Toxic Releases to Air	92	93	90
EJ Index - Lead Paint (% pre-1960 housing)	94	92	92
EJ Index – RMP Facility Proximity	93	90	90
EJ Index - Wastewater Discharge	95	92	85

Bold indicates ≥ 80th percentile; **RED** ≥ 90th percentile (WI)

¹¹ National Cancer Institute, State Cancer Profiles, <https://statecancerprofiles.cancer.gov/incidencerates/>

¹² Manitowoc County, Community Health Assessment, https://manitowocountywi.gov/wp-content/uploads/2023/01/2022_CHA-Report_MC.pdf

¹³ CJEST, <https://screeningtool.geoplatform.gov/en/>

¹⁴ Peter's Pantry, <https://peterspantry.org/>

¹⁵ Grow It Forward, <https://www.grow-it-forward.org/>

Target Areas: Census Tract 4 (CT-4); Census Tract 5 (CT-5), Census Tract 8 (CT-8). **Select acronyms:** BBSC = Building Blocks for Sustainable Communities; LMI = low-to-moderate income; TID = tax incremental financing district; WDNR = Wisconsin Department of Natural Resources

by the housing scarcity in CT-5 and the disproportionate need in the CEJST database summarized in Section 2.a.ii.1.

Unique Environmental Exposure - Fish Advisory. WDNR issued a fish advisory for the River for PCBs⁴, which are a constituent of concern at the priority brownfield sites. The advisory is critical to the local Hmong (estimated population 1,421 in the City), as language barriers exist and exposure risk is not fully understood, but sustenance fishing is popular. 31% of the Hmong population in the City live in the Target Areas², and based on a study in a nearby community there could be 910 Hmong residents in Manitowoc impacted by the fish advisory⁶.

(2.a.ii.3.b) Environmental Justice – Advancing EJ. Legacy immigration and minority housing policies (e.g., redlining) created highly segregated communities in the upper Midwest¹⁶. Redevelopment of the Target Areas will advance the *Path to Achieving Justice⁴⁰ Initiative* in this disproportionately impacted, underserved community by making a more livable/walkable community via increasing access/options to healthy housing, with desired outcomes of increasing food security, improving air quality by traffic reduction, and decreasing crime. Residential redevelopment is focused on workforce and LMI housing (i.e. healthy housing at varying price points); therefore, displacement of the underserved community will not occur. The City will further work to actively mitigate displacement by hosting problem-solving meetings and establishing a Community Benefit Agreement.

2.b. Community Need and Community Engagement – Community Engagement

(2.b.i) Project Involvement and (2.b.ii) Project Roles. The City's BAC was established over a decade ago and provides significant input on the City's phenomenally successful Brownfields program. BAC members will continue to bring important community voices to the table supporting the City's *Plans* and targeting community needs (Section 2.a). The general public, the BBSC steering committee, and Target Area residents will be engaged via a Community Involvement Plan (CIP), to be developed in Fall 2025. Partners listed on **Table 8** affirm their commitment to serve on the BAC.

Table 8. Members of the Brownfields Advisory Committee			
Name of entity/ organization	Entity's mission	Point of contact	Specific involvement in the project or assistance provided as a BAC member
Chamber of Manitowoc County	Member-driven org. that provides resources and services to promote business	Abby Quistorf abbey@chambermanitowoccounty.org	Facilitate redevelopment by identifying resources to <u>encourage small businesses</u> to redevelop brownfields in the Target Areas Manitowoc per the City's <i>Plans</i> . Progress Lakeshore is additionally a <u>BBSC steering committee member.</u>
Progress Lakeshore	Economic Dev. Corp. working to retain, grow, and attract businesses	Jamie Zastrow jamie@progresslakeshore.org	
Bank of Luxemburg	Local lending institution providing financing for brownfield redevelopments	Dennis Tienor dennistienor@bankoflux.com	Local lending institution providing insight on financial <u>guidance on proposed reuse</u> and assist developers to secure funding.
Allie Family Companies	Property Management and Real Estate; expertise in redeveloping brownfields	Alex Allie aallie@alliecompanies.com	Represent local brownfield developer expertise on successful multi-family residential developments. <u>BBSC steering committee member.</u>
Grow It Forward 501(c)(3)	Use good food to build community and feed change in Manitowoc County	Jackie Terp jackie@grow54220.com	Local non-profit food pantry neighboring the Target Areas, <u>addressing food security and housing equity.</u> <u>BBSC steering committee member.</u>
Friends of the Manitowoc River Watershed	Provide a unified voice to enhance the Manitowoc River and its watershed	James Kettner jim@lnrp.org	Volunteer organization <u>representing stakeholders who recreate on the Manitowoc River</u> , including underserved community members.
USEPA & WDNR Project Managers	To Be Determined - Provide technical assistance and review of work products in Tasks 1-3 outlined in Section 3; (e.g., QAPP, eligibility determinations (EDs), Phase I/II ESAs, RAPs).		
The Director of the Manitowoc County Health Department. (Korina Aghmar; 920-683-4155) will attend BAC meetings and community outreach meetings to answer any health-related questions/concerns related to assessment work.			

(2.b.iii) Incorporating Community Input. The cornerstone of the City's Brownfields Program is enhancing public education/communication through continued workshops, resident questionnaires, and web-based engagement. Community involvement in these decision-making processes began over a decade ago and continued through development of the *Plans* described in Section 1. Within one month of award, the City (grantee) will develop a citywide CIP to leverage the expertise and networks of the BAC. The CIP will be designed specifically to engage and inform the underserved community members, provide an avenue for input/feedback, and establish how input will be considered and responded to. The approved CIP will be implemented in Fall 2025, utilizing the BAC to engage the community and local businesses in assessment and overall redevelopment of brownfields in the City. The timeline for community

¹⁶ National Geographic, *MapMaker: Redlining in the United States*, <https://education.nationalgeographic.org/resource/mapmaker-redlining-united-states/>
Target Areas: Census Tract 4 (CT-4); Census Tract 5 (CT-5), Census Tract 8 (CT-8). **Select acronyms:** BBSC = Building Blocks for Sustainable Communities; LMI = low-to-moderate income; TID = tax incremental financing district; WDNR = Wisconsin Department of Natural Resources

meetings will be outlined in the CIP. The City will hold at least one meeting per quarter at key points during the project, including: 1) after USEPA approval of the workplan to kick off the project; 2) completion of **Task 2**; 3) midpoint of **Task 3**; and 4) completion of **Task 3**. **Project tasks and schedules are described in 3.a.**

Since 2020, the BAC has used online meeting platforms (e.g., Zoom or Microsoft Teams) for outreach meetings. Virtual tools have worked extremely well in the past to connect citizens to City-led brownfield redevelopment projects. The CIP will include a variety of engagement practices, including expanding virtual tools (e.g., online meeting platforms, social media, and webpage/email updates). As Target Area brownfields are likely to affect residents with Spanish and/or Hmong as their first language, translations of project materials will be developed in coordination with the BAC. Community meetings will be held in the evenings to accommodate stakeholder work schedules. Meetings will be held at locations served by the mass transit system within walking distance of the Target Areas and at ADA-compliant facilities to accommodate needs of sensitive populations (e.g., disabled, elderly).

3.a. Task Descriptions, Cost Estimates, and Measuring Progress - Description of Tasks/Activities & Outputs

The City has retained a Qualified Environmental Professional (QEP) consulting firm per 2 CFR 200.317-200.326 and 2 CFR 1500, and has developed the appropriate tools and procedures to immediately begin implementation of the grant.

Task 1 - Program Management	
i. <u>Project Implementation</u> :	Finalize contract with QEP; prepare Quarterly Reports, Annual Financial Reports, and Disadvantaged Business Enterprise (DBE) Reports; update ACRES; Grant Closeout Report.
ii. <u>Anticipated Project Schedule</u> :	Finalize contract with QEP Oct. 1, 2025. Quarterly progress reports will be submitted by Jan. 30th, April 30th, July 30th, and Oct. 30th of each year, with the first due on Jan. 30, 2026. Annual DBE reports will be submitted by Oct. 30th, with the first due on Oct. 30, 2026. Grant project closure expected in Q4 FY29.
iii. <u>Task/Activity Lead</u> :	City Project Manager (PM) and City Project Coordinator, with input from QEP.
iv. <u>Outputs</u> :	Administrative Records; QEP Procurement Documentation; (16) Quarterly Reports; (3) Annual Financial Reports; (3) DBE Reports; (1) Grant Closeout Report.
Task 2 – Brownfield Inventory and Prioritization	
i. <u>Project Implementation</u> :	Update the City of Manitowoc dynamic federal and state GIS database records with sites of potential concern; historic brownfield maps collection; and cloud-based brownfields GIS Database. Identify additional sites for consideration/prioritization under this grant (City has identified over 688 brownfields community-wide).
ii. <u>Anticipated Schedule</u> :	Begin in Q1 FY26 and complete by Q2 FY26, with annual updates by Q1 of FY27 to FY29.
iii. <u>Task/Activity Lead</u> :	City PM, with support from City GIS staff and QEP.
iv. <u>Outputs</u> :	Inventory GIS Files; Inventory Report (tables, maps, # of sites identified); Prioritization Memorandum.
Task 3 – Phase I and II ESAs, Supplemental Site Investigations, Remedial Action Plans, Revitalization Planning	
i. <u>Project Implementation</u> :	Update QAPP annually. Prepare the following for priority sites identified in Section 1.a.ii and additional sites prioritized for assessment in Task 2: EDs/access agreements; Phase I ESAs; Sampling and Analysis Plans (SSSAPs) and Phase II ESAs; Supplemental (Supp.) SSSAPs, SIs, and RAPs; and a Revitalization Plan (Revit. Plan) with public charrettes for priority brownfield. ED requests will be submitted to the USEPA (for hazardous substance brownfields) or the WDNR (for petroleum brownfields) for approval. Phase I ESAs will comply with the <i>All Appropriate Inquiry</i> Final Rule and ASTM E1527-21. Phase II ESAs will be conducted per ASTM 1903-19. SIs and RAPs will be prepared per the WDNR requirements found in ch. NR 700 Wis. Administrative Code.
ii. <u>Anticipated Schedule</u> :	First EDs and Phase I ESA by Q1 FY26, with work through the grant performance period.
iii. <u>Task/Activity Lead</u> :	City PM to coordinate work with the QEP, secure access agreements, and review all reports/plans. QEP to complete EDs, Phase I ESAs, QAPP updates, Supp./SSSAPs, Phase II ESAs, SIs, RAPs, and Revit. Plan.
iv. <u>Outputs</u> :	(3) QAPP updates, and up to (8) EDs; (7) Phase I ESAs; (6) SSSAPs & (6) Phase II ESAs; (5) Supp. SSSAPs & (5) SIs; (3) RAPs; (1) Revit. Plan.
Task 4 – Community Outreach	
i. <u>Project Implementation</u> :	Create CIP. Host up to (16) BAC/community meetings in Target Area neighborhoods and (6) focus meetings for each priority brownfield. Present at (3) regional/state meetings and the 2025 National Brownfields Conference. Prepare project webpage, fact sheets, and press releases.
ii. <u>Anticipated Schedule</u> :	First BAC/community meeting in Q1 FY26, then quarterly through FY29. (3) meetings in priority site neighborhoods in Q2 FY26, (3) in Q1 FY27. Regional/State/National Brownfields Conferences 2025-2029.
iii. <u>Task/Activity Lead</u> :	City PM and BAC, with support from QEP.
iv. <u>Outputs</u> :	CIP; meeting agendas, notes, and sign-in sheets; project fact sheets and press releases; project webpage, with updates; and presentation materials for Regional/State/National Brownfields Conferences.

3.b. Task Descriptions, Cost Estimates, and Measuring Progress - Cost Estimates

A summary of the proposed budget for grant funded activities is provided below, followed by an explanation for how cost estimates were developed and applied, including unit costs as applicable. Unit rates for project deliverables are based on the City's FY21 Coalition Assessment Grant. Personnel (\$38/hr) and fringe (\$12/hr) are an average of City staff. An average \$150/hour was used for QEP consulting firm contractual services and units based on grant closeout in Q1 FY29.

Line #	Budget Categories	Task 1	Task 2	Task 3	Task 4	Total
		Program Management	Inventory & Prioritization Update	Phase I ESAs; SSSAPs; Phase II ESAs; Supp. SSSAPs & SIs; RAPs; Planning	Community Outreach	
Direct Costs	1 Personnel	\$5,472	\$4,560	\$4,864	\$5,776	\$20,672
	2 Fringe	\$1,728	\$1,440	\$1,536	\$1,824	\$6,528
	3 Travel				\$3,100	\$3,100
	4 Supplies				\$1,500	\$1,500
	5 Contractual	\$7,200	\$6,000	\$455,000		\$468,200
TOTAL BUDGET		\$14,400	\$12,000	\$461,400	\$12,200	\$500,000

Task 1 – Program Management: Total Budget = \$14,400

Cost Basis and Assumptions: Personnel/Fringe Costs of \$7,200 is budgeted for an estimated 144hr of work by City PM and staff (3hr/mo @ \$50/hr) in completing various Cooperative Agreement oversight, reporting activities and deliverables for Task 1 described in Section 3.a.i-v. Contractual Costs of \$7,200 are for an estimated 48hr (1hr/mo @ \$150/hr) of work by the QEP in providing assistance in completing progress (e.g., quarterly, annual) reports.

Task 2 – Brownfield Inventory and Prioritization Update: Total Budget = \$12,000

Cost Basis and Assumptions: Personnel/Fringe Costs of \$6,000 is budgeted for an estimated 120hr of work by City GIS staff (@ \$50/hr). Contractual Costs of \$6,000 is budgeted for 40hr of work by the QEP (@ \$150/hr) to expand/update the GIS inventory and prioritization rubric.

Task 3 – Phase I & II ESAs, Supp. SSSAPs & SIs, Remedial Action Plans, Revit. Plan: Total Budget = \$461,400

Cost Basis and Assumptions: Personnel/Fringe Costs of \$3,200 are budgeted for an estimated 64hr of work by the City PM and staff (8hr/site for 8 sites @ \$50/hr) for executing access agreements, coordinating QEP work, and reviewing deliverables; \$3,200 in Personnel/Fringe costs are budgeted for an estimated 64hr of work by the City PM and staff (@ \$50/hr) organizing/hosting three charrettes/meetings as part of Revitalization Planning. Contractual Costs of \$455,000 include costs for the QEP to complete 3 QAPP updates (\$5,000); 8 ED forms (@\$2,000 each = \$16,000); 7 Phase I ESAs (@\$7,000 each = \$49,000); 6 SSSAPs (@\$2,500 each = \$15,000) and 6 Phase II ESAs (@\$27,000 each = \$162,000); 5 Supp. SSSAPs (@\$2,500 each = \$12,500) and 5 SIs (@\$27,500 each = \$137,500); 3 Remedial Action Plans (@ \$11,000 each = \$33,000); 1 Revitalization and Reuse Plan (@ \$25,000 each = \$25,000).

Task 4 – Community Outreach: Total Budget = \$12,200

Cost Basis and Assumptions: Personnel/Fringe Costs of \$7,600 are budgeted for an estimated 152hr of work by the City PM and staff to develop the CIP (24hr @ \$50/hr); organizing and hosting quarterly outreach events (5hr/quarter @ \$50/hr); presenting at 6 local community meetings (24hr @ \$50/hr); and attending and presenting at 3 regional/state meetings (24hr @ \$50/hr). Travel Costs of \$3,100 are for 2 City staff to attend the three-day National Brownfields Conference in 2025: \$1,560 for meals and for lodging (@\$260/person/night); \$700 for registration (@\$350/person); \$700 for air travel (@\$350/person); and \$140 for ground transportation (@ \$70/person). Supply Costs of \$1,500 are budgeted for printing costs (\$1,000) and mailing costs for public notices (\$500).

3.c. Task Descriptions, Cost Estimates, and Measuring Progress - Plan to Measure & Evaluate Environmental Progress & Results.

Project results, outputs and outcomes will be tracked, and progress measured/evaluated weekly using existing tools developed by the City and summarized in quarterly progress reports and annual financial reports prepared during the project under Task 1. Project outputs, progress, and schedule will be tracked continuously to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of the community. For measuring/evaluating progress, outputs will be compared to the project schedule proposed in Section 3.a; if a deviation of more than one fiscal quarter is reached, interventions (e.g., increased team meetings) will be implemented to maintain the project schedule. Project outcomes and accomplishments, including project milestones, deliverables, and leveraged resources will further be tracked on a monthly/quarterly basis in the ACRES database to further measure progress. Overall project outcomes will be tracked/quantified in the final progress report by comparing future community demographics/welfare characteristics to current conditions and will include analysis of: 1) increased housing opportunities; 2) increased sustainable manufacturing through generation/retention of new businesses and jobs; and 3) stabilization downtown by increasing appealing retail amenities and removing vacant properties that often harbor criminal activity. If the timelines for advancing one or more phases of work within the Target Areas are not well aligned with the USEPA grant project period, then the City and QEP will work with USEPA and WDNR to adjust the approach

to maintain progress on achieving desired project outcomes. Outcomes will be tracked long-term on a five-year basis by the City and reported in future brownfield conferences, fact sheets, and/or the City website.

4.a. Programmatic Capability and Past Performance – Programmatic Capability

(4.a.i) Organizational Capacity. This grant will be managed by the same high-performing team of City staff members who established the City's Brownfields program over a decade ago and involved with management and implementation of 9 USEPA cleanup (FY24, FY23, FY22), assessment (FY21, FY18, FY15, FY13) and RLF (FY13) grants.

(4.a.ii) Organizational Structure. The City of Manitowoc Community Development Department will be the lead agency on the project. The City has retained a QEP consulting firm per the requirements of 2 CFR 200.317 - 200.326. The City will also use the expertise of the BAC, City, WEDC, and USEPA to provide guidance and marketing.

(4.a.iii) Description of Key Staff.

Mr. Adam Tegen, Community Development Director of the City of Manitowoc, will continue to serve as the Brownfield Project Manager for this project and will be responsible for project performance and coordination with USEPA/WDNR. Mr. Tegen has served in planning, zoning, and economic development for over 20 years and leads all of the City's brownfield and economic development efforts. Mr. Tegen currently serves as the project manager for the FY24, FY23, and FY22 cleanup grants, the City's FY21 Coalition Assessment Grant, the extraordinarily successful FY18 USEPA SSA, FY18 USEPA CWA, and FY13 RLF.

Mr. Paul Braun, City Planner, will continue to serve as the Brownfield Project Coordinator for this project and will coordinate work with the QEP and other City departments. Mr. Braun has provided oversight and management of all of the City's USEPA grants (= \$5,800,000), including: the FY24, FY23 and FY22 USEPA cleanup; FY21 USEPA coalition; FY13, FY15, and FY18 USEPA CWA; FY18 USEPA SSA; State brownfield grants (\$1,600,000); and FY13 RLF. In this role, Mr. Braun verified compliance with all reporting and financial responsibilities for the City to successfully meet all USEPA milestones. In the event of future personnel turnover, the planned "team" approach will prevent any interruptions with the implementation of the project. Mr. Braun has been involved in daily grant operations for the previously funded USEPA grants and can immediately step in as either interim or replacement project manager in the case of loss/reassignment of the active Project Manager. Mr. Tegen and Mr. Braun will capitalize on the expertise of three additional key City staff members including a GIS Specialist, a Planner, and an Administrative Support.

Mr. Shawn Alfred, Finance Director, will continue to provide financial tracking and grant documentation support to ensure that grant requirements are met.

(4.a.iv) Acquiring Additional Resources. The City retained a QEP; though, if necessary, additional contractor(s) will be retained per 2 CFR 200.317 - 200.326 and 2 CFR Part 1500. The City promotes local hiring/procurement to link members of the community to brownfield redevelopment work. As documentation of this program, 100 % of the recent brownfield cleanup/redevelopment work (all bid per 2 CFR 200) was awarded to prime and secondary contractors based in Manitowoc. The City actively recruits MBE/WBE subcontractors as part of ongoing *6 Good Faith Efforts*.

4.b.i Past Performance and Accomplishments – Currently Has/Previously Received an EPA Brownfields Grant USEPA Brownfield CWA Grants for Hazardous Substances and Petroleum (FY-11, FY-15, FY-18)

(4.b.i.1) Accomplishments: Outputs include 24 Phase I ESAs, 2 LGU Exemptions, 3 GPR surveys/NHPA DOEs, 50 Phase II ESAs/Supp. Assessments, and 10 Remedial Planning documents at 32 properties. Outcomes include leveraging \$3MM in City work in CT-5; \$150MM+ investment in cleanup/redevelopment projects, [private (\$149MM), donation (\$120k), State funds (\$1MM)]; and creation of 193 full-time jobs. All project milestones were recorded in ACRES. Accomplishments are working toward meeting the need of sustainable job creation/preservation in Manitowoc as discussed in Section 1.

(4.b.i.2) Compliance with Grant Requirements: The City met schedule and reporting milestones and maintained compliance with the work plan, schedule, and terms and conditions of the cooperative agreement. The City submitted the required annual financial reports, quarterly reports, and project deliverables in a timely manner per the workplan and cooperative agreement. The City kept the ACRES database up to date and the grants were expended in the period of performance.

(i) USEPA Brownfield Coalition Grant (FY-21)

(4.b.i.1) Accomplishments: Outputs include 10 Phase I ESAs, 19 Phase II ESAs/Supp. Assessments, and 7 Remedial Planning documents at 15 properties using funds from this grant. Outcomes include leveraging \$3MM in City funding for work in CT-4; \$15MM+ investment in cleanup/redevelopment projects; and creation of 30 full-time jobs. All project milestones are being recorded in ACRES. Accomplishments are working toward meeting the need of expanding healthy housing and diverse commercial amenities in Manitowoc as discussed in Section 1.

(4.b.i.2) Compliance with Grant Requirements: The City is meeting schedule and reporting milestones and is maintaining compliance with the work plan, schedule, and terms and conditions of the cooperative agreement. The City is submitting the required annual financial reports, quarterly reports, and project deliverables in a timely manner per the workplan and cooperative agreement schedule. The City is keeping the ACRES database up to date during the performance period.

ATTACHMENT A1: THRESHOLD CRITERIA**Name of Applicant: City of Manitowoc, Wisconsin****1. Applicant Eligibility**

- a. The City of Manitowoc, Wisconsin is a “general purpose unit of local government” as that term is defined in 2 CFR 200.64 and is therefore eligible to receive a USEPA cooperative assessment agreement.
- b. Not Applicable; the City is not a social welfare organization described in Internal Revenue Code (IRC) 501(c)(4).

2. Community Involvement

To provide for significant community involvement during implementation of the of the City’s previous and current USEPA Grants, the City of Manitowoc through official resolution established the City of Manitowoc Brownfields Advisory Committee. This Committee represents a diverse combination of community stakeholders directly involved with Brownfields education/outreach/job training/economic growth/redevelopment/community development/community outreach. This Committee currently meets on at least a bi-monthly basis and has been given the unique responsibilities of identifying and prioritizing sites for assessment and assisting with securing resources to facilitate redevelopment/reuse.

To provide for project continuity and building on the diversity of the current Brownfields Advisory Committee, during implementation of this grant, the City will continue to work with the Brownfields Advisory Committee to inform and involve the community and other stakeholders during the planning, implementation, and other Brownfield assessment activities described in this proposal. The City and BAC have developed and implemented several Community Involvement Plans (CIP) during implementation of previous cooperative agreements and will develop a new CIP for this grant.

The City of Manitowoc successfully adjusted outreach activities following the COVID-19 pandemic. Official municipal Committee and Council meetings have returned to in-person, but a virtual option is available. Meeting locations are likely to vary but will be held in a convenient location that is ADA-accessible and serviced by the local mass transit network. Meetings are expected to be held in the evening to accommodate working members of the community. However, virtual tools will remain to accommodate those with limited mobility/access.

Virtual tools continue to work extremely well in connecting citizens to brownfield redevelopment projects. Project information will continue to be shared by the Mayor during his routine local radio show and by the project partners through their existing networks. Spanish speakers will be reached through the local Spanish radio station and translated materials provided through local retailers. The local newspaper will likely be a significant source of information dissemination. Pop-up displays of Site renderings at the summer farmer’s market will allow for socially-distant feedback. The displays could have QR Codes to allow cell phone users direct access to the project website to leave comments.

3. Expenditure of Existing Grant Funds

The City of Manitowoc does not have an active coalition assessment grant.

4. Contractors and Named Subrecipients

Contractors. Stantec Consulting Services, Inc. was retained in compliance with 2 CFR 200.317-200.326, 2 CFR Part 1500, and USEPA’s Best Practices Guide to Procuring Services to serve as the QEP consulting firm to assist with implementation of this assessment grant, if awarded.

The City of Manitowoc issued a Request for Qualifications for comprehensive brownfield services on December 12, 2022 with a due date of January 20, 2023 (39 days). The RFQ was published on the City’s website. The City of Manitowoc reached out directly by email to 13 potential contractors. The RFQ scored responses by **Business Organization; Management Outline and Project Approach; Experience and Capabilities;** and **Cost (25% of score)**. The City of Manitowoc received and considered 5 responses and selected Stantec.

The December 12, 2022 RFQ and Stantec’s contract are all through OneDrive. Please email the grant applicant (Adam Tegen <ategen@manitowoc.org>) for the login and password

Subrecipients. No subrecipients are named in this grant application.