



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. Funding Requested

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

3. Location

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

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

5. 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

6. General Population (2021 US Census Bureau Estimate)

- a. City of Manitowoc = 34,626

7. Other Factors Checklist

Other Factors	Page #(s)
Community population is 10,000 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.2
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 located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Letter from the State Environmental Authority

See attached letter from the Wisconsin Department of Natural Resources

9. Releasing Copies of Applications

Not Applicable

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Tony Evers, Governor
Adam N. Payne, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



November 8, 2023

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
FY24 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,

Christine Sieger

Christine Sieger, 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

(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 in the early 1800s by European settlers was agricultural, fishing, lumber, and shipbuilding. Settlement was followed by large-scale industrial development in Census Tract 5507100400 (CT-4) and in Census Tract 5507100500 (CT-5) for tanneries and metal works/foundry operations. The railroad port of Manitowoc (located in CT-4) facilitated shipping of aluminum/leather goods (made in CT-5) across Lake Michigan. The economic strength from industrial manufacturing in CT-4 and CT-5 through the mid-20th Century led to construction of two large contiguous commercial shopping centers in the north-adjointing Census Tract 5507100100 (CT-1) in 1968. Sadly, the collapse of the industrial sector in the 1980s due to offshoring and market conditions crushed the financial security of families in CT-4 and CT-5, and in combination with the construction of the Interstate I-43 corridor, the once vibrant shopping centers in CT-1 were slowly mothballed over the next three decades leaving the community with large empty parking lots and dilapidated buildings. The combined collapse within CT-1, CT-4, and CT-5 (herein the “**Target Areas**”) created **an abundance of brownfields that today represents over 13% of the City by area** and resulting in a **38% decrease in population**, a **41% decrease in average income**, and a **2-fold increase in the poverty rate**, which is why these once thriving areas of the City are critical for redevelopment. Yet, the density of brownfields in these areas allows for meaningful and strategic community growth. Brownfields in the City have led to significant blight, poor economic conditions, and a welfare risk to the community as described in Section 2.a. The City’s inventory identified more than 1,600 potential brownfields including former industrial facilities, a railroad yard, plating facilities, drycleaners, gasoline stations and large vacant commercial buildings, and other vacant/underutilized sites in the City, with 47% located in the Target Areas (**Table 1**). These brownfield sites have long posed an economic, environmental, and psychological drain on the community. While the density of brownfields in these Target Areas allows for meaningful, strategic community 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 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) increased greenspace connecting local and regional multi-modal trails.

Table 1. Census Tract	Potential Brownfields
CT-5	182 Parcels (282 acres)
CT-4	424 Parcels (253 acres)
CT-1	146 Parcels (1,043 acres)

(ii) **Description of the Priority Brownfield Sites.** As noted on **Table 2**, the three “**Priority Brownfield Sites**” pose known risks to human health and the environment from multiple hazardous substances and petroleum spills. The priority sites are vacant/unoccupied, and as described in Section 1.b.(ii), redevelopment of these three brownfields represents the greatest potential to develop added workforce and LMI housing, build appealing retail amenities, and increase greenspace connecting local and regional multi-modal trails along waterways, which is why these brownfield sites are priorities.

Table 2. Priority Site & Location	Size	Site Description & Environmental Concerns	Contaminants of Concern	Funding Needs
1000-1200 Water Street (CT-5)	2 Parcels (6 acres)	Past Use: Former smoke flavoring manufacturer, former office complex, former bulk petroleum storage yard Current Use / Conditions: Parcels mostly vacant; buildings remain.	PAHs, VOCs, metals, solvents	Supplemental Phase II ESA, SI, RAP
River Point District (CT-4)	20 Parcels (23 acres)	Past Use: Former railroad turntable, shipping port, bulk petroleum storage, warehouse Current Use / Conditions: Buildings razed; site is vacant	PAHs, VOCs, metals, PCBs, cyanide	Site Investigation, RAP
Lakeshore Mall Complex (CT-1)	3 Parcels (36 acres)	Past Use: Vacant shopping center, former automotive repair facility, former gasoline station, former drycleaner Current Use / Conditions: Some buildings razed; site is vacant	PAHs, VOCs, metals, PCBs, cyanide,	Supplemental Phase II ESA, SI, RAP

(iii) **Identifying Additional Sites.** As described in Section 3a, Task 2 of this project will update the City’s Brownfields GIS database to identify additional brownfield properties. Identified properties will then be ranked for prioritization using the City’s current rubric, which has been developed over the past decade and shown to be highly successful in facilitating meaningful redevelopment. The prioritization rubric will include a combination of screening level and detailed ranking criteria. The criteria include: (1) if property is located in a disadvantaged CT; (2) eligibility for assessment based on the requirements of USEPA; (3) property 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/neighborhood 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 community input, the City will involve the existing Manitowoc Brownfields Advisory Committee (BAC; Section 2.b) in site identification and prioritization activities.

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

(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. 19 (CT-5), No. 22 (CT-4), No. 18 (CT-1) Project Plans*, the *Downtown Master Plan* and the *Downtown Parking Analysis* (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 underserved community members and members of the BAC during public meetings/charettes held during development of the *Plans*. For example, the underserved community struggles with a severe lack of housing in the downtown area and a lack of diverse commercial amenities; therefore, common established goals for priority 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 and objectives, reuse plans and strategies for each of the **priority brownfields** are summarized on **Table 3.**

Table 3. Priority Site	Reuse Plans/Strategy	Alignment with Revitalization/Land Use Plans
1000-1200 Water Street (CT-5)	Redevelop brownfield for multi-family residential (market rate and LMI) with greenspace/trail.	Supports goals of the <i>Plans</i> for multi-family housing (~80 units) along the Manitowoc River in downtown Manitowoc. Redevelopment will expand the bimodal trail on south side of River.
River Point District (CT-4)	Redevelop brownfield for multi-family residential (market rate and LMI) with greenspace/trail.	Supports goals of the <i>Plans</i> for expanding housing (~90 units) along the Manitowoc River in downtown Manitowoc. Redevelopment will expand the bimodal trail on the north side of the River.
Lakeshore Mall Complex (CT-1)	Redevelop brownfields in the corridor for mixed-use residential and commercial	Supports goals of the <i>Plans</i> for housing (61 residential homes and multi-family redevelopment 80 apartment units) and 5 commercial outlots (11 acres). Redevelopment expands the trail along the Lake.

(ii) Outcomes and Benefits of Reuse Strategy. The City’s revitalization plans will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments. The projects proposed will not cause the displacement of residents or businesses and generate the following anticipated benefits/outcomes.

- Increase affordable workforce and LMI housing options: Finalized redevelopment plans for the three Priority Sites include constructing 61 single family homes and 250 multi-family apartment/townhome/condominium units in three Target Areas to address the City’s workforce and LMI housing burden. All new construction will incorporate energy efficiency to qualify for LEED. A recent study noted buildings constructed to LEED standards contributed 50% fewer greenhouse gases¹. This increase in energy efficiency is an added benefit of this strategy.
- Support adaptive residential (workforce/LMI) reuse & energy efficiency projects: Several brownfields in the Target Areas are ideal for adaptive residential 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 align with energy efficiency requirements and will include innovative technologies such as air source heat pumps and hybrid water heater systems. The goal will be to have all LEED certified buildings.
- Expanding attractive and diverse commercial opportunities for small business growth: Redevelopment of the Lakeshore Mall Complex (CT-1) will include 11 acres of commercial redevelopment on 5 outlots along the perimeter of the multi-family redevelopment. *Plans* focus on use of the commercial parcels for diverse food/service/office/retail amenities and non-profit organizations. This private investment is easily **\$25M** and will generate several hundred full-time jobs.
- Expanding multi-modal trail to support communities: Redevelopment of the Priority Sites in CT-4 and CT-5 will expand the multi-modal trail on the north and south sides of the Manitowoc River, respectively by adding ~2 miles of new trail connecting the Priority Sites to the regional trail network. The Lakeshore Mall Complex is located adjacent to Lake Michigan, which will provide residents/guests/tenants direct access to the Statewide multi-modal trail network.

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

(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.

¹ <https://escholarship.org/uc/item/935461rm>

Select acronyms: Target Areas = Census Tract 5 (CT-5), Census Tract 4 (CT-4), Census Tract 1 (CT-1); BAC = Brownfield Advisory Committee; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; LMI = low-to-moderate income; TID = tax incremental financing district

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 10 active TIDs valued at well over **\$62,000,000** available to support redevelopment in Manitowoc. Of note, the City is prepared to create a new TID for the priority brownfield in CT-1 (estimated value of **\$50,000,000**) and leverage TID 19 (CT-5) to support the Priority Brownfield (estimated value of **\$17,000,000**). TID 22 (CT-4) remains healthy and was used from 2020-2023 for infrastructure construction.

Eligible and Potential - State/Fed. The City of Manitowoc will pursue (and support developers in pursuing) funding from potential sources including State (WEDC SAG and WAM [assessment]; WEDC [cleanup]; WEDC Startup [reuse], and WDNR [cleanup loans/grants; reuse]) agencies and 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, **this grant 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 a large brownfield located in CT-5.

(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 is summarized below on **Table 4**.

Table 4. Priority Brownfield	Reuse and Leveraging Strategy of Existing Infrastructure
1000-1200 Water Street (CT-5)	The City invested several million (\$) in stormwater infrastructure in the early 2000s to mitigate flooding in CT-5, including a new stormwater outfall at the Priority Brownfield.
River Point District (CT-4)	Under TID 22, the City invested \$10MM through 2023 and will bond \$3.5MM in 2024 for constructing 4,000-linear feet of new utilities and roadways at the River Point District.
Lakeshore Mall Complex (CT-1)	Under TID18, City invested \$5MM in multi-modal trail adjacent to Property which will connect priority Brownfield to trail networks and large green space. Demolition of the remaining buildings and parking lot will generate a very significant quantity of cementitious

Future infrastructure investments at the priority brownfield properties will include expansion of utilities and/or road/transportation projects, which can be accomplished using WisDOT, 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 Target Area (and elsewhere in the City); which will directly improve water quality and ensure clean drinking water at the new development. Washington Street (CT-5) was recently repaved (**\$480,000**) and Franklin Street (CT-5) will be reconstructed in 2024, including new utilities, which will leverage **\$1,750,000** in infrastructure investment. New bridges/sidewalks were constructed along the Manitowoc River (CT-4 and CT-1) to enhance the walkability in the downtown corridor (**\$102,000**). Additional City-wide leverage includes investments made by the City, such as better integration of the complete streets (i.e., bikeable/walkable) concept.

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

(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, exacerbated by COVID-19 and compounded by restricted state/local funding. Municipal funds are restricted by law for designated purposes, and lenders would not loan for assessment without egregious terms. Key indicators of disproportionately impacted populations summarized on **Table 5** reflect a gradual (sometimes punctuated) decline in economic condition since 1970 when manufacturing was the City’s economic foundation. The comparison from 1970 to 2021 shows that the continuous decline in the community has endured and has been unable to resolve since the collapse of the manufacturing sector. For example, CT-5 experienced a **38% decrease in population, 41% decrease in average income, and 2-fold increase in the poverty rate²**, which is why this area is critical. Concurrently, minority populations increased 3 to 4-fold² and the Hispanic population is expected to keep growing due to a relatively sizable percentage of young persons and higher rates of immigration. The Hmong population continues to grow, and Asian poverty has more than doubled since 2009² (data not available for 1970 when manufacturing was the economic foundation). Depressed economic conditions have reduced educational attainment, the high school and college graduate rate in the Target Areas is significantly lower than the rest of the City, 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.

² 2017-2021 Data available online with subscription at policymap.com. Data from 1970 per socialexplorer.com with a subscription. *na* (Table 5) = not applicable
 Select acronyms: Target Areas = Census Tract 5 (CT-5); Census Tract 4 (CT-4), Census Tract 1 (CT-1); BAC = Brownfield Advisory Committee; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; LMI = low-to-moderate income; TID = tax incremental financing district

Table 5. Indication of Community Need ³	Target Areas (CT-5)	Target Areas (CT-4)	Target Areas (CT-1)	City	County	State of WI	US
Population (change since 1970) ²	2,731 -38%	4,194 -32%	5,731 <i>na</i>	34,626 <i>na</i>	81,359 0%	5.9m +34%	331.4m <i>na</i>
Percent Poverty Rate (change since 1970) ²	20% 2-fold	13% +65%	10% <i>na</i>	13% <i>na</i>	9% +30%	11% +19%	12.8% <i>na</i>
Percent Families in Deep Poverty	7.3%	5%	0.5%	4%	2.4%	2.6%	<i>na</i>
Mean Household Income (change since 1970 in 2023 \$\$) ²	\$40,313 -41%	\$53,836 -34%	\$63,221 <i>na</i>	\$51,563 <i>na</i>	\$58,464 -4%	\$67.1K -7%	\$64.0k <i>na</i>
Single Mothers in Poverty	49%	32%	<u>27%</u>	50%	40%	32%	<i>na</i>
High School Graduate (only)	39%	24%	27%	34%	36%	30%	<i>na</i>
Bachelor's Degree or Higher	15%	31%	35%	23%	22%	31%	<i>na</i>
% Homes <\$100,000 Value	86%	36%	32%	39%	29%	15%	<i>na</i>

Small Population Size. 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. Also, the population of the City is 34,626, so while fairly small is too large to receive US Department of Agriculture brownfield funds.

Loss of Jobs. 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 one facility closed in CT-5, the initial economic impact was the loss of \$19,000,000 in annual wages and benefits associated with the 1,150 relatively high wage manufacturing jobs. In the past six years, the region’s manufacturing base has lost over 7,000 jobs, or 17% of peak employment. This continued loss in jobs has resulted in decreases in local tax revenue that would otherwise be available to complete brownfield assessments.

Low Income / Poor Economic Condition. The majority of households in the Target Areas rent. As an example of poor economic condition, the average income of renters in CT-5 is \$30,982 (compared to \$34k in the City and \$37k in the County) and renters in CT-5 are using 50% of their income to pay rent, compared to 35% in the City and 24% in the County³. With the average rent in CT-5 increasing by 49% from 2016 to 2020⁴ combined with high food costs (estimated \$1,050 for a family of 4), it is clear that the housing burden is a significant contributor to the skyrocketing poverty rates in the Target Areas (especially for single mothers and elderly [Table 7]). Proposed redevelopment plans will address housing insecurity for LMI families, increase multi-family housing, provide new greenspace, and commercial opportunities to improve the poor economic conditions of the community.

Limited State/Local Funding – General and Shared Revenue. The City’s inventory identified 750 brownfields in the project area that today represents over 13% of the City by area. Using costs from the City’s FY21 CA, it will cost \$23MM just to complete the first two phases of due diligence at these sites, which equal the entire 2024 tax levy of the City. Additionally, a very large percentage of homes in the Target Areas are valued less than \$100,000; therefore, general revenue from property tax clearly is not a viable option to complete assessment, remediation, and reuse of brownfields.

(ii.1) Threats to Sensitive Populations – Health or Welfare of Sensitive Populations. As noted in Section 2.a.i and further summarized on Table 6, the USEPA Environmental Justice Screening (EJScreen) tool noted the demographic index of the Target Areas ranks in the upper 80th percentile compared to the State due largely to the high percentage of low-income populations, suggesting a high exposure risk to sensitive populations. EJScreen indicates the Target Areas ranks in 94th and 95th percentile in Wisconsin for low income, 96th percentile for linguistic isolation in CT-5, and 97th percentile for education specifically in CT-5 and CT-1. As noted on Table 7 in, the rate of children in poverty in the Target Area is double the rate of the rest of the County and State, and single mothers with children in the Target Area are nearly guaranteed to be living in poverty. Given that the future earning potential of a female growing up in unfavorable economic conditions in the Target Area is up to 17% less than males, multi-generational poverty is difficult to overcome. Further, 7% to 18% of people over 65 live in poverty, which is a 1-fold increase since 2020 and more than double the State poverty rates for the elderly (Table 7).³ The economic condition of children, single mothers, and elderly could explain why 20% of families in CT-5 and 9% in CT-4 (4% CT-1) are receiving SNAP benefits, compared to 8% County-wide.³

Table 6. Sensitive Population (%ile in State) ⁴	CT-5	CT-4	CT-1
Demographic Index	87	90	80
Low Income	94	95	94
Linguistic Isolation	96	0	0
< HS Education	97	81	96
Under 5 Years Old	90	96	42
People of Color	86	86	13

³ Data from policymap.com based on ACS, 2017 - 2021. Bold indicates worse conditions than WI/US; RED is worse than or equal to City/County and WI/US. na=data not available.
⁴ <https://ejscreen.epa.gov/mapper/>. RED indicates greater than the 90th Percentile & BLACK indicates greater than 80th Percentile compared to the State of Wisconsin. Select acronyms: Target Areas = Census Tract 5 (CT-5); Census Tract 4 (CT-4); Census Tract 1 (CT-1); BAC = Brownfield Advisory Committee; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; LMI = low-to-moderate income; TID = tax incremental financing district

Lack of Healthy Housing: A significant need in the region is healthy workforce and LMI housing. Housing stock is very old in the Target Areas (98% of homes 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 CT-5 (\$75k) is less than half of the State median confirming

Table 7. Sensitive Population ³	Target Area (CT-5)	Target Area (CT-4)	Target Area (CT-1)	City	State of WI
Elderly (65 and older)	9%	18%	22%	9%	7%
Elderly in Poverty	18	11%	8%	10%	8%
Disabled	14%	16%	8%	15%	12%
Disabled in Poverty	8%	33%	24%	22%	20%
Children (< 5 years)	8%	7%	3%	5%	6%
Poverty rate for children	39%	22%	7%	26%	15%
Non-White Population	29%	17%	16%	19%	21%
Hispanics	11%	7%	7%	7%	8%
Hispanics in poverty	0%	24%	82%	28%	19%

that income is not fairly distributed and finding healthy housing, especially for single mothers with children in poverty, is an insurmountable challenge. The Census Bureau estimates that upwards of 40% of homeowners and 60% of renters are burdened by housing costs. This unfortunately forces sensitive populations to residential areas similar to those adjacent to the priority sites where lead-based paint is present.

Access and Food Security: Obesity and food insecurity continue to be significant social justice issues in the Target Areas. CT-5 is 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 for lack of vehicle access³. Directly impacting residents, WDNR issued a fish advisory for the Manitowoc River for PCBs, which are a constituent of concern at the Target Properties⁵. The advisory is critical to the local Hmong (estimated population 1,518)⁶ where language barriers exist and exposure risk is not fully understood, but fishing is a popular sport. Based on a study in a nearby community, there could be 910 Hmong residents in Manitowoc impacted by the fish advisory.⁷

Improve Welfare. Redevelopment of the Target Properties for mixed-use commercial/ residential and green space will improve welfare conditions by increasing healthy housing; directly addressing PCB contamination to improve fisheries and increase access to food. Wellbeing will be improved by increased access to greenspace for increased recreation.

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

Asthma. The 2022 USEPA Toxics Release Inventory for Manitowoc indicates 3,500,000 pounds of toxic chemical waste was generated at 19 regulated facilities, which is a 9% increase compared to 2018.⁸ Air quality is significant, and although not available for the Target Areas, data from the State of the Air 2023 report gives Manitowoc County an “C” for ozone pollution.⁹ Although data is not available for the Target Area, the percentage of children in Manitowoc County with asthma is **50% greater** than the adjoining county (Sheboygan Co.)¹⁰. Given the prevalence of childhood asthma, it is not surprising the adult rate of asthma is **30% greater** in Manitowoc County compared to the National average.¹⁰ Undoubtedly, poor air quality has a disproportionate impact on sensitive populations (Table 7), and with the change in weather patterns in Manitowoc due to climate change, poor air quality days are increasing yearly.

Birth Defects. Birth defect rates are not available for the Target Areas. The Wisconsin Department of Health Services (WDHS) Manitowoc County Profile indicates the rate of congenital anomalies in the County is 1.1%, which is double the rate suffered by children in the adjacent county.¹¹

Lead Exposure. A total of 146 children (birth to age 6) were lead poisoned in CT-5 between 2000 and 2014 (data after 2014 not available), which is 5 to 7-times greater than the rate in State and County. As noted previously, 98% of the housing was built before lead paint was banned and lead paint is a known constituent of concern at the Target Areas. Additionally, 4721 lead water supply laterals totaling over 13 miles in length have been identified in the City; with a high density located at residential housing units in the Target Areas (6,256 properties). The rate of childhood (age <18 years) cognitive disability in the target Census Tracts (e.g., 10.3% in CT-5) is double the rate for the State and the US (4.0 and 5.4%, respectively)⁴. Additionally, the percent of all disabled individuals with a cognitive disability in the target Census Tracts (e.g., 59% in CT-5) is nearly double the rate for the State and the US (37 and 38%, respectively).⁴ Although the precise cause/source of cognitive disabilities in children and in the disabled population is likely due to a multitude of factors, cumulative lead exposure is known to cause severe neurological damage.

⁵ <https://dnr.wi.gov/topic/fishing/consumption/>

⁶ <https://www.hmongnews.com/story/news/2021/05/10/manitowoc-second-wisconsin-city-celebrate-hmong-american-day-may-14/7354587002/>

⁷ <https://www.sciencedirect.com/science/article/abs/pii/S0380133094711631>

⁸ <https://www.epa.gov/toxics-release-inventory-tri-program>

⁹ <https://www.stateoftheair.org/city-rankings/states/wisconsin/manitowoc.html>

¹⁰ <https://www.cdc.gov/asthma/national-surveillance-data/asthma-prevalence-state-classification.htm> and <https://www.cdc.gov/asthma/nhis/default.htm>

¹¹ <https://www.dhs.wisconsin.gov/stats/phprofiles/manitowoc.htm> and <https://www.countyhealthrankings.org/app/wisconsin/2020/rankings/>

Select acronyms: Target Areas = Census Tract 5 (CT-5); Census Tract 4 (CT-4), Census Tract 1 (CT-1); BAC = Brownfield Advisory Committee; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; LMI = low-to-moderate income; TID = tax incremental financing district

Cancer Rates. The WDHS Manitowoc County Profile¹¹ indicates the age-adjusted cancer rates for acute lymphocytic leukemia; bladder, brain/central nervous system, melanoma, and pancreatic cancer; and pediatric acute lymphocytic leukemia are all greater than the State rate. The poor health outcomes in the Target Properties could be associated with lack of health insurance as the uninsured rate is **DOUBLE** the County and State.³ Although the precise cause/source 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 2023 Population Health Institute at the University of Wisconsin¹⁰ ranked Manitowoc County 50 out of 72 Counties in Wisconsin for overall health based on characteristics associated with sensitive populations: morbidity (which included self-reported fair or poor health, poor mental health days, and percent of births with low birth weight); social and economic factors (which included measures of education, employment, income, family and social support, and community safety); and physical environment (which included many EJ parameters). Obesity remains a significant challenge in Manitowoc County and the Target Areas, with 18% of the low-income preschool children considered obese and 32% of the adult population considered obese, which places the County in the highest quartile compared to other counties in Wisconsin.

Reduction of Health Risk. Redevelopment of the Target Properties will mitigate these health conditions by decreasing contamination mass and source areas; improving surface water quality which will result in an increase in the quality of local fisheries; and increase opportunities for healthy living as summarized in Section 1.b(ii) by increased healthy housing and increased alternative energy/transportation options; and removal of lead laterals (Section 1.c.ii).

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

In combination with zoning, persistent policies and questionable industrial operators have historically disproportionately impacted the community. The City’s legacy of heavy industrial activity and associated pollution has resulted in a disproportionate burden to sensitive populations (women, elderly, children) in these minority-majority Census Tracts. Those lacking formal education, single mothers in poverty, and children in poverty, are especially threatened. **Table 8** summarizes disproportionate EJ negative impacts in the Target Areas and in a community disproportionately burdened with poor air quality (e.g., National Air Toxics Assessment [NATA]; particulate, and ozone indices), with increased risk to children from lead exposure in housing (lead paint indicator), and abundant risks to water quality (risk management plan and wastewater discharge indices).

Table 8. EJ Index Percentile (%ile in State)⁴	CT-5	CT-4	CT-1
EJ Index - NATA Diesel Particulate Matter	82	83	66
EJ Index - NATA Air Toxic Cancer Risk	86	90	80
EJ Index - NATA Respiratory Hazard Index	78	80	92
EJ Index - Ozone	89	92	86
EJ Index - Lead Paint Indicator	90	92	74
EJ Index – Risk Management Plan	91	94	84
EJ Index - Wastewater Discharge	90	95	73

Climate and Economic Justice. As noted in Section 1.a.i, equitable housing is one of the greatest needs in Manitowoc. Therefore, it is not surprising the Climate and Economic Justice Screening Tool (CEJST)¹² identified CT-5 as being **disadvantaged for sustainable housing**, which is attributable to housing cost burden and older housing stock with a high lead paint risk compounded by low household 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 of the Target Property as further **disadvantaged due to legacy pollution** due to the high proximity to hazardous waste sites.

Access and Food Security: The density of fast-food restaurants in the City (6.75 per 10,000 population) is one of the greatest in the State¹³ and 10% of the population of the City are in food-insecure households¹⁶. Even more worrisome, the study estimates that 13.7% of children in the City are food-insecure, which places the project area in the upper 95% of counties in the State for food-insecurity. The food pantry 5 blocks from CT-5 is seeing overwhelming demand, distributing 3,500 pounds of food per day¹⁴, which is not surprising given the low income of the community.¹¹

Lack of Healthy Housing: A significant need in CT-5 is healthy workforce and LMI housing, as echoed by the disproportionate need in the CJEST database and summarized in Section 2.a.ii.1.

Unique Environmental Exposure - Fish Advisory. WDNR issued a fish advisory for the River for PCBs, which are a constituent of concern at the Target Properties⁵. The advisory is critical to the local Hmong (estimated population 1,518)⁶ where language barriers exist and exposure risk not understood, but sustenance fishing is popular. Based on a study in a nearby community, there could be 910 Hmong residents in Manitowoc impacted by the fish advisory.⁷

3.b Environmental Justice – Advancing EJ. Legacy immigration and minority housing policies (e.g., redlining) created

¹² <https://screeningtool.geoplatform.gov/en/#13.62/44.09501/-87.67279>

¹³ <https://foodsecurity.wisc.edu/> and <http://wgnv.com/2016/04/19/ranked-u-s-cities-with-the-most-fast-food-restaurants-per-capita/>

¹⁴ <https://peterspantry.org/>

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highly segregated communities in the upper Midwest.¹⁵ Redevelopment of the Target Areas will advance the *Path to Achieving Justice40 Initiative* in the disproportionately impacted, underserved community by making a more livable/walkable community via increasing access/options to healthy housing; increasing food security; improving air quality by traffic reduction; and decreasing crime. Redevelopment is targeted to assist in housing for LMI households; therefore, displacement of the underserved community is not anticipated; however, the City will further work to actively mitigate displacement through multiple problem-solving meetings and a Community Benefit Agreement

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

(i) Project Involvement and (ii) Project Roles. The City’s BAC was established ten years ago and has met to provide significant input on the City’s phenomenally successful Brownfields program. BAC members reviewed and provided input on this application and will continue to bring important community voices to the table supporting the City’s reuse *Plans* and targeting community needs (Section 2.a). Members on **Table 9** affirm their commitment to serve on the BAC.

Table 9. Members of the Brownfields Advisory Committee

Organization (focus)	Point of Contact	Partner Role / Specific Expertise on BAC
The Chamber of Manitowoc County (<i>economic and business development</i>)	Abby Quistorf 920-684-5575 abbey@chambermanitowoccounty.org	Facilitate redevelopment by identifying resources to encourage small businesses to locate/build on brownfields in Manitowoc per the City’s <i>Plans</i> .
Progress Lakeshore (<i>housing and business development</i>)	Jamie Zastrow; 920-482-0540 jamie@progresslakeshore.org	Facilitate redevelopment by identifying resources to encourage multi-family residential developers to redevelop brownfields in the Target Areas.
Bank of Luxemburg (<i>local lending institution</i>)	Dennis Tienor; 920-652-3240 dennistienor@bankoflux.com	Provide insight on financial guidance on proposed reuse, and assist developers to secure funding.
Lakeshore Technical College (<i>local tech. college</i>)	Rachel Kroeplien; 920-946-9111 rachel.kroeplien@gotoltc.edu	Provide linkage to job training opportunities to students in brownfield assessment/reuse.
Allie Family Companies (<i>local brownfield developer</i>)	Alex Allie aallie@alliecompanies.com	Represent local brownfield developer expertise on successful multi-family residential developments.
Community Member At Large (<i>housing, food security, social & env justice</i>)	Mike Huck 920-242-4770 [REDACTED]	Facilitate translation of project materials into Spanish and Hmong and facilitate engagement of the minority underserved community.
Friends of the Manitowoc River Watershed (<i>watershed group</i>)	James Kettler 920-304-1919; jim@hrp.org	Represent stakeholders who recreate on the Manitowoc River.
USEPA and WDNR Project Managers	To Be Determined - Provide technical assistance and review of work products in Tasks 1, 2, and 3; outlined in Section 3; (e.g., QAPP, SSSAP, RAP/MMP, Construction Documentation Report)	
The Director of the Manitowoc County Health Department. (Stephanie Lambert; 920-683-4155) will attend BAC meetings and community outreach meetings to answer any health-related questions/concerns related to assessment work.		

(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 the decision-making process at the Target Properties began decades 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 (members listed in Sections 2.b(i)). The CIP will be designed specifically to engage and inform the underserved community members and to provide an avenue for input/feedback from the community. The CIP will also discuss how community input will be considered and responded to. The approved CIP will be implemented in Fall 2024 to integrate community involvement utilizing the BAC to engage the community and local businesses in the assessment, cleanup, and overall redevelopment of brownfields in the City. The timeline for community meetings will be outlined in the CIP. The City will hold at least one meeting per quarter at key points during the project, including: (A) after USEPA approval of the workplan to kick off the project; (B) completion of Task 2; (C) midpoint of Task 3; (D) and completion of Task 3. Project tasks and schedules are described in 3.a.

Since 2020, outreach meetings have used online meeting platforms (e.g., Zoom or Microsoft Teams). 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 socially-distanced engagement practices, including expanding virtual tools (e.g., online meeting platforms, social media, and webpage/email updates). The brownfield assessment project is 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 work schedules of stakeholders. In addition, meetings will be held at a location served by the mass transit system and within walking distance of the Target Area

¹⁵ <https://mapmaker.nationalgeographic.org/map/10f16803d86a4e3d94966ca4659caac0?lat=30.7639&lon=-105.2984&zoom=3>
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neighborhood(s). The meeting facility will be ADA-compliant to accommodate needs of sensitive populations (i.e., disabled or elderly). Hard copies of all project outputs will be made available at City Hall.

3.a. Task Descriptions, Cost Estimates, and Measuring Progress - Description of Tasks/Activities & Outputs. The City has developed the appropriate tools and/procedures, has retained a Qualified Environmental Professional (QEP) consulting firm per 2 CFR 200.317-200.326 and 2 CFR 1500, and is able to immediately begin implementation of the grant. Personnel (\$38/hr) and fringe (\$12/hr) are an average of City staff involved with the City’s FY21 Coalition Assessment Grant. Contractual/construction estimates are based on unit costs from the City’s FY21 Coalition Assessment Grant. The budget/schedule assumes the project closes Q4 FY28.

Task 1 - Program Management
i. Project Implementation: Finalize contract with QEP consulting firm; prepare Quarterly Reports, Annual Financial Reports, and Minority/Women Business Enterprise (MBE/WBE) Reports; update ACRES; Grant Closeout Report.
ii. Anticipated Project Schedule: Finalize contract with QEP Oct. 1, 2024. 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, 2025. Annual DBE reports will be submitted by Oct. 30th, with the first due on Oct. 30, 2025. Grant closeout expected in Q1 FY2029.
iii. Task/Activity Lead: City Project Manager (PM) and City Project Coordinator, with input from QEP.
iv. Outputs: Administrative Records; QEP Procurement Documentation; (16) Quarterly Reports; (3) Annual Financial Reports; (3) MBE/WBE Reports; (1) Grant Closeout Report.
Task 2 – Brownfield Inventory and Prioritization
i. Project Implementation: Update City of Manitowoc dynamic federal and state geographic information system (GIS) database records with sites of potential concern, update collection of historic brownfield-related maps, update prioritization scoring, update cloud-based brownfields GIS Database.
ii. Identifying Additional Sites: As noted in Section 1, the City has identified well over 1,600 potential brownfields. Task 2 will be a community-wide task and will undoubtedly identify additional sites for prioritization under this grant.
iii. Anticipated Schedule: Begin in Q1 FY25 and complete by Q2 FY25, with annual updates by Q1 of FY26 to FY28.
iv. Task/Activity Lead: City PM, with support from City GIS staff and QEP.
v. Outputs: 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. Project Implementation: This task includes annual updates to the QAPP, completion of (8) Eligibility Determinations (EDs)/access agreements, and (7) Phase I ESAs followed by up to (6) Sampling and Analysis Plans (SSSAPs) and (6) Phase II ESAs on the priority sites identified in <u>Section 1.a.ii</u> and other sites prioritized for assessment in Task 2. Task 3 includes (5) Supplemental (Supp.) SSSAPs and Site Investigations (SIs) followed by (3) Remedial Action Plans (RAPs) at the priority brownfields and other sites prioritized for assessment in Task 2. A Revitalization Plans (Revit. Plan) with public charrettes will be completed at (1) 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. Identifying Additional Sites: Three priority sites are summarized in <u>Section 1.a.ii</u> . Additional sites identified in Task 2 will also be targeted for work under Task 3.
iii. Anticipated Schedule: First EDs and Phase I ESA by Q1 FY25, with work through the grant performance period.
iv. Task/Activity Lead: 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.
v. Outputs: Up to 8 EDs; 7 Phase I ESAs; 3 QAPP Updates; 6 SSSAPs and 6 Phase II ESAs; 5 Supp. SSSAPs and 5 SIs; 3 RAPs; 1 Revit. Plan.
Task 4 – Community Outreach
i. Project Implementation: This task includes: preparation of the CIP; hosting up to (16) combined BAC/community meetings in neighborhoods within the Target Areas; hosting (6) focus meetings for each priority brownfield; presenting at (3) regional/state meetings; preparation of fact sheets and press releases; preparation of a project webpage; and presenting at the 2025 National Brownfields Conference.
ii. Anticipated Schedule: First BAC/community meeting in Q1 FY25; then quarterly through FY28. Three meetings in priority brownfield neighborhoods in Q2 FY25, with (2) meetings in Q1 FY26 elsewhere in the City. Regional/State/National Brownfields Conferences in 2025-2028.
iii. Task/Activity Lead: City PM and BAC, with support from QEP.
iv. Outputs: 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.

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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

(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 were involved with management and implementation of 8 USEPA cleanup (FY23, FY22), assessment (FY21, FY18, FY18, FY15, FY13) and RLF (FY13) grants.

(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.

(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 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 (=\$3,900,000), including: the FY23 and FY22 USEPA cleanup; FY21 USEPA coalition; FY13, FY15, and FY18 USEPA CWA; FY18 USEPA SSA; State brownfield grants (=\$1,500,000); 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.

(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 Past Performance and Accomplishments – Currently Has/Previously Received an EPA Brownfields Grant

(i) USEPA Brownfield CWA Grants for Hazardous Substances and Petroleum (FY-11, FY-15, FY-18)

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.

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)

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.

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 currently has an active coalition assessment grant awarded under cooperative agreement BF-00E03044. As of October 1, 2020, \$537,978.53 (89.6%) of the grant has been expended, leaving a balance of \$62,021.47. A screen shot of the ASAP balance sheet taken on 9/27/2023 is shown below.

Account Profile

Agency Location Code/Region :	68128933
Federal Agency Name :	RTPFC-Grants
Recipient ID :	5521944
Recipient Organization Name :	CITY OF MANITOWOC WISCONSIN
Requestor ID :	5521944
Account ID :	BF00E03040
Account Type :	Regular Account
Account Description :	CITY OF MANITOWOC BROWNFIELD
TAS Distribution Method :	Percentage By Account
Group ID :	50819
Account Status :	Open
Create Date :	09/30/2021
Begin Date :	08/23/2021
Performance Period End Date :	09/30/2024
End Date :	01/30/2025
Allow Book Entry Adjustments :	Yes
Allow Warehoused Payments :	Yes
Grant (Y/N) :	Yes
FAIN :	BF00E03040
CFDA Number :	66.818
CMA Indicator :	No
Funding Technique :	
Total Estimated Grant Amount :	\$0.00
Cumulative Authorized Amount :	\$600,000.00
Available Balance :	\$62,021.47
Cumulative Authorized Amount Reset Period :	
Annual Reset Month :	

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.