

2026 Application Information Sheet

R05-26-A-037

- 1. Applicant Identification: City of Duluth
411 West First Street
Duluth, Minnesota, 55802-1102
- 2. Funding Requested: Community-wide Assessment Grant
\$500,000
- 3. Location: Duluth, St. Louis County, Minnesota
- 4. Target Area: Downtown Duluth
 - Census Tracts 16, 17, 19, & 20 St. Louis County, MN
 - See attached Exhibit A (Target Area Map)

Priority Sites:

Kozy Site, East First Street & N 2 nd Avenue East
Shoppers Ramp Site, N 2 nd Avenue West & West First Street
New Garrick Building, 128 W. First Street
126 E. First Street
118 E. First Street

- 5. Contacts:
 - Project Director: Angie Stier
Economic Developer
160 City Hall
411 West First Street
Duluth, Minnesota 55802-1102
astier@duluthmn.gov
218-730-5324

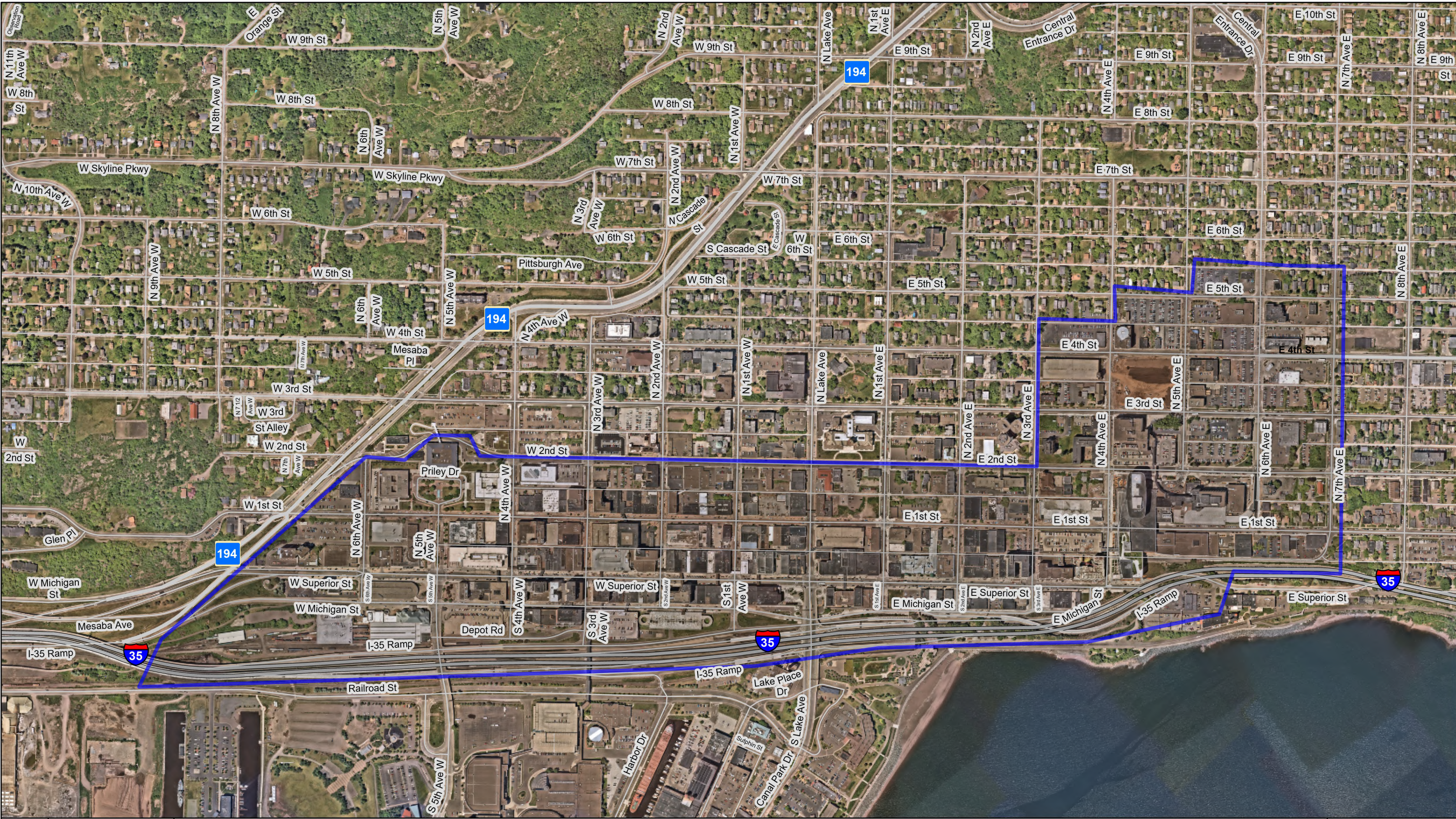
- Chief Executive: Roger Reinert
Mayor
403 City Hall
411 West First Street
Duluth, Minnesota 55802-1102
rreinert@duluthmn.gov
218-730-5230


- 6. Population: 86,697

- 7. Other Factors:

Other Factors that apply to the proposed project	Page #
Community Population is 10,000 or less	N/A

The applicant is, or will assist, a federally recognized Indian tribe or United States Territory	N/A
The priority site(s) is impacted by mine-scarred land	N/A
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)	N/A
The priority site(s) is in a federally designated flood plain	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy	N/A
The reuse of priority site(s) will incorporate energy efficiency measures	Pg. 1-2
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures	N/A
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)	N/A
The target are(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing	N/A




 0 500 ft
 Source: City of Duluth
 Date: 9/17/2025

 Study Area

STUDY AREA BOUNDARY

EXHIBIT A- TARGET AREA



The City of Duluth has tried to ensure that the information contained in this map or electronic document is accurate. The City of Duluth makes no warranty or guarantee concerning the accuracy or reliability. This drawing/data is neither a legally recorded map nor a survey and is not intended to be used as one. The drawing/data is a compilation of records, information and data located in various City, County and State offices and other sources affecting the area shown and is to be used for reference purposes only. The City of Duluth shall not be liable for errors contained within this data provided or for any damages in connection with the use of this information contained within. The City of Duluth requires that this map/data not be redistributed to any party in whole or in part, including any derivative works of products generated by combining the data with other data, unless authorized by the City of Duluth GIS office.

January 26, 2026

VIA EMAIL

Angie Stier
City of Duluth
411 W First St
Duluth, MN 55802

RE: City of Duluth EPA Brownfield Assessment Grant Application
Letter of Support from the MPCA Brownfield Program

Dear Angie Stier:

On behalf of the Minnesota Pollution Control Agency (MPCA), we are writing to acknowledge and support the proposed assessment activities for the City of Duluth in fulfillment of the criteria of the United States Environmental Protection Agency (EPA) Fiscal Year 2026 Brownfield Assessment Grant guidelines.

The City of Duluth has informed the MPCA that they intend to perform petroleum and hazardous substances assessment activities through a Community-Wide Assessment Grant. Assessment activities would include an inventory and both assessment and remedial planning at brownfields throughout the city.

The MPCA is supportive of the City of Duluth's application for an EPA Brownfield Assessment Grant. Should this grant be awarded, the MPCA will partner with the City of Duluth to help them improve the environment and build a better future for residents in the region.

If you have any questions, please contact Shanna Schmitt at 651-757-2697 or by email at shanna.schmitt@state.mn.us, or Stacey Hendry-Van Patten at 651-757-2425 or by email at stacey.vanpatten@state.mn.us.

Sincerely,

Shanna Schmitt

This document has been electronically signed.

Shanna Schmitt, PG, CPG
Brownfield Program Coordinator
Remediation Division

Stacey Hendry-Van Patten

This document has been electronically signed.

Stacey Hendry-VanPatten
Supervisor
Remediation Division

SS/SVP:ss

cc: Torre Ippolito, US EPA Region 5 (electronic)
Amanda Anderson, City of Duluth (electronic)

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields Background and Description of Target Area

Duluth, Minnesota is a city of approximately 87,500 located at the western tip of Lake Superior, and it is home to hundreds of potential brownfields sites. This city-wide estimate comes even after decades of work to clean up the Saint Louis River corridor, which at one time was the most contaminated estuary in the United States. Brownfields remain prevalent throughout the city because for a period of nearly a century, Duluth served as one of the nation's most significant centers of commerce. Beginning in the 1880s, successive generations of extractive industry thrived in northeast Minnesota. During this time, timber, railroads, mining, and shipping all made Duluth the nation's busiest port and wealthiest city.

In the 20th century, many of Duluth's industrial sites were converted to serve the emerging automotive industry. This was particularly true in Duluth's downtown neighborhood, which comprises the Target Area for this application. Prior to the construction of Interstate 35, Duluth's First and Second Streets served as the city's primary West-East arteries, running through the heart of downtown Duluth's central business district. Many of the buildings that still stand in this neighborhood were developed as auto repair shops, dealerships, fueling stations, and enclosed parking structures. Today, more than 197 brownfields are present within the Target Area, with 47 of those properties classified as major release sites.¹ Another 49 sites are likely home to underground storage tanks due to their industrial origins.²

In the second half of the 20th century Duluth's long industrial boom finally burst. Major industrial employers were forced to close, the city's economy collapsed, and a population that had grown to 110,000 fell steadily for 30 years before settling at its current level in the early 1990s. Duluth's downtown was left with large swaths of vacant and underutilized properties that still serve as a defining feature of the Target Area. The neighborhood is also characterized by depressed property values, elevated crime rates, high concentrations of unhoused and transient populations, and elevated instances of adverse health conditions.

The Target Area encompasses Duluth's downtown neighborhood, located within Census Tracts 16, 17, and 19 in St. Louis County Minnesota. This area contains a wide range of land uses and includes the city's historic arts and cultural district, Duluth's medical district, automotive services, diverse commercial, and industrial waterfront properties.

The medical district serves a regional hub, especially since Essentia Health's 2023 investment of \$900 million for the construction of a new hospital tower and surgery center. This major investment demonstrates the economic potential of the area. However, just one block west of this new development, a very different set of conditions exists. As residents and visitors move west toward North Third Avenue East, they encounter an area marked by long-term vacancy, deteriorated buildings, and safety concerns. This sharp contrast highlights the uneven redevelopment patterns in downtown Duluth and is home to all five Priority Sites identified in this application.

This eight-block section along Duluth's First Street corridor is widely perceived as unsafe and is often avoided by residents and visitors. Visible signs of disinvestment include burned and boarded buildings, graffiti, vacant lots, and underutilized parking areas. The corridor also experiences high levels of transient activity and requires ongoing public safety and life-safety response. In 2025, 34% of all Duluth crime occurred in the downtown and the hillside neighborhoods. These conditions deter pedestrians and mirror challenges faced by downtowns across the country, where commercial districts have struggled to recover from decades of economic decline as well as the recent impacts of COVID-19.

Duluth is a 180-degree city bordered by Lake Superior on its eastern side. As a result, the city has limited land available to meet the community's housing and development needs through expansion. EPA Community-Wide Assessment funding will help the city pursue a redevelopment approach instead. Together with Duluth's existing Brownfields RLF program, these assessment funds will help to transform blighted properties in the critical downtown neighborhood identified as the Target Area into productive community assets that support economic growth, environmental health, and long-term neighborhood stability.

¹ PEER: Platform for Exploring Environmental Records, available at <https://www.communitylattice.com/peer-toolce> (last accessed 1/28/2026).

² PEER: Platform for Exploring Environmental Records, available at <https://www.communitylattice.com/peer-toolce> (last accessed 1/28/2026).

1.b Description of Priority Brownfields Sites

The City of Duluth has identified five priority sites for redevelopment.

Priority Sites, Table 1.

Site Name/Address	Acres	Historic Use ³	Potential/Known Contaminants ⁴	Adjacent to Water?	Incorporate Energy Efficiency?
Kozy Site East First Street & N 2 nd Avenue East	.33	1887 townhomes, former bar and ballroom, vacant after fire in 2010, building demolished in 2025 following two additional fires	solvents, PAHs, PCBs, asbestos, lead	No	Yes
Shoppers Ramp Site N 2 nd Avenue West & West First Street	.30	entertainment venue, 1957 parking ramp	petroleum, solvents, PAHs, PCBs, asbestos, lead	No	Yes
New Garrick Building 128 W. First Street	.34	retail and residential uses, contributing structure to historic district	asbestos, lead	No	Yes
126 E. First Street	.09	former retail uses, dry cleaners, pawn shop	asbestos, lead, dioxins, furans, PAHs, PCBs, and heavy metals	No	Yes
118 E. First Street	.17	parking garage, auto body shop	asbestos, lead, dioxins, furans, PAHs, PCBs, and heavy metals	No	Yes

The City of Duluth, in partnership with the Duluth Economic Development Authority (DEDA), is actively working to reverse a pattern of disinvestment and change the narrative about development potential within the Target Area. In 2025, DEDA took control of three long-blighted Priority Sites to advance redevelopment efforts. These include the Kozy Building, historic New Garrick Building, and the Shoppers Parking Ramp.

Despite this progress, redevelopment within the Target Area remains complex. Two additional fire-damaged Priority Sites remain privately owned, vacant and blighted. These require ongoing intervention by the city due to trespassing and structural concerns. The same is true for sites throughout the Target Area, with 16% of the city’s property damage crimes taking place in this neighborhood.⁵ Environmental uncertainty further complicates reuse and discourages private investment. Due to the historic uses of the First Street corridor and age of the built environment, we expect contaminants found in this area to include lead, asbestos, heavy metals, VOC’s, underground storage tanks and petroleum.

1.c Identify Additional Sites

Additional eligible sites will be determined with new tools. The City of Duluth will create a geographic information system (GIS) database to support a Brownfields Properties layer. With a Brownfields Properties GIS layer in place, additional funds will be used to work with a consultant to implement and update the city’s existing brownfields inventory. The prioritization rubric will contain ranking criteria to assess (1) if the site is eligible based on public risk criteria; (2) site significance relative to achieving the reuse strategies articulated in the city’s planning documents and market analyses; (3) willingness of property owners to partner with the city on environmental studies and provide access; (4) marketability of the site and the potential for redevelopment emphasizing multi-family residential, commercial and underserved community stabilization; (5) severity of contamination threatening public health and/or the environment and hindering development; (6) potential positive impact on the surrounding community to be realized via site re-use.

Revitalization of the Target Area

1.d. Reuse Strategy and Alignment with Revitalization Plans

The city’s reuse strategy for the Target Area is to create a thriving residential neighborhood by prioritizing redevelopment that includes safe, stable, and affordable housing. Reusing previously developed sites is among the Key Principals identified in the city’s comprehensive plan, and recent citywide housing studies indicate that Duluth needs 8,713 new housing units by 2035. The city’s Brownfields Team will review prioritization and identification of all sites and proposed redevelopment projects for consistency with Duluth’s Comprehensive Plan, Imagine Duluth 2035, as

³ (1955) Sanborn Fire Insurance Map from Duluth, Saint Louis County, Minnesota. Sanborn Map Company, Vol. 2, ; Republished 1955. [Map] Retrieved from the Library of Congress, https://www.loc.gov/item/sanborn04287_013/.

⁴ PEER: Platform for Exploring Environmental Records, available at <https://www.communitylattice.com/peer-toolce> (last accessed 1/28/2026).

⁵ Duluth Police Department Crime Data.

well as related studies addressing the Target Area, including: Imagine Downtown 2035, 2025 Duluth Comprehensive Housing Needs Analysis, 2023 Downtown Duluth Housing Market Analysis, Medical District Plans, and Downtown Duluth Revitalization Visioning. In each plan the community was directly involved for years by participating in surveys, working groups, advisory boards and community meetings. Additionally, the city's Brownfields Team will be arranging community meetings within the Target Area to best capture feedback from community residents. Digital methods of receiving feedback will also be made available to the public to gain additional information to best reflect community needs and revitalization efforts in an accessible format.

1.e Outcomes and Benefits of Reuse Strategy

Creating a thriving residential neighborhood within the Target Area will help the city to meet its housing goals while revitalizing a critical neighborhood and supporting its existing residents. The information attained by utilizing assessment funding will allow developers to plan for development and adaptive reuse and be more informed, improving the built environment, to help attract better, more stable affordable housing and opportunities to grow local tax base.

Increased affordable housing options: three DEDA owned Priority Sites are best suited to include affordable housing. While no plans currently exist, their zoned district and proximity to amenities are favorable for these uses.

Support adaptive reuse and site development: Existing buildings and vacant lots will see development and benefit by access to services and amenities. With these investments, the outcome created will bring new job opportunities, connect divided neighborhoods of Duluth, and allow a useful, planned, clean and active passage to downtown for hillside residents.

Green Infrastructure investment: Revitalization efforts will be required to connect to existing green infrastructure for pedestrians and building owners. Planned infrastructure will include antiquated green spaces and infiltration management practices and utilizing the existing steam heating to increase efficiency, safety and rejuvenate community pride. Community and neighborhood resilience will be visible, productive and provide safety with increased commercial and residential activity and decreased blight.

Strategy for Leveraging Resources

1.f Resources Needed for Site Reuse

MN Department of Employment and Economic Development (DEED) Contamination Cleanup Grants: This competitive program provides grants for brownfield cleanup with a small amount awarded for assessment. Priority is given to projects that result in increased tax base and job creation. Since 2000, the City has obtained over \$429,000 in assessment and over \$8.5 million in cleanup grant funds for brownfield and anticipates similar success for this grant.

MPCA Targeted Brownfield Assessment Funds (MNTBAP): The MPCA-funded programs provide consulting services to perform environmental assessments and engineering at eligible brownfield properties. The city has accessed an estimated \$125,000 TBAP for work at two sites in the Target Area since 2020.

Regional Exchange District: The city is asking the state for legislation to fund redevelopment within this district, which also falls within the Target Area, creating another funding option for demolition and site prep.

MN DEED Minnesota Investment Fund (MIF): The City of Duluth has partnered with businesses on projects that leverage MN DEED MIF loans. This funding is contingent on job growth, and supports machinery and equipment. The city was able to work with multiple businesses to obtain \$3.55 million of MIF funding for business expansion.

DEED Redevelopment Grant: These grants address costs of land acquisition, demolition, infrastructure improvements, and soil stabilization. The city has secured over \$8.8 million in Redevelopment Grants since 2025.

Duluth EPA Revolving Loan Fund: The City was awarded a \$1million EPA-funded RLF in 2022; these funds can be used for cleanup activities.

Duluth 1200 Fund: A nonprofit 501(c)(3) organization, launched the Historic Fund targeted specifically targeting the East First Street Corridor. The program provides building owners within Duluth's Commercial Historic District with accessible financing to rehabilitate contributing historic structures.

Community Development Block Grant: The City of Duluth secured \$40,000 for installing street trees on E. First Street.

Stormwater and Transportation Sales Tax: City funds of \$3 million have been dedicated to street infrastructure repairs in 2028.

Duluth Housing Trust Fund: The Duluth Housing Trust Fund provides loans for housing redevelopment, with approximately \$6 million of funding available.

1.g Use of Existing Infrastructure

Much of the existing infrastructure within the Target Area is aging, failing and in poor condition. Plans are being developed to remove the existing trench drain installed along the south side of First Street in the 1980s. During the same period, brick paving and sidewalks were installed. While beautiful, the brick street surface is difficult to repair, complicates utility work, and creates safety concerns due to slippery conditions in winter months. Together, these infrastructure issues increase redevelopment costs and discourage private investment.

The City of Duluth has committed local resources to address these challenges. Using local stormwater utility fees and a local transportation sales tax, the City's Engineering Department has scheduled major transportation and infrastructure improvements along First Street in 2028.

Planned upgrades will include opportunities for all existing and new buildings to connect to Duluth's energy-efficient district hot water steam system, supporting reduced energy costs and lower emissions. The redesign will also

allow for the replacement of lead service lines, improving public health outcomes. In addition, the project will incorporate green infrastructure elements such as rain gardens to better manage stormwater, reduce runoff, and improve water quality. These improvements will modernize the corridor and support both existing and future development, while concentrating on the health and safety of downtown residents.

Further investment has already been made. In 2026, the City will use \$40,000 in Community Development Block Grant (CDBG) funds to install 20 new street trees along East First Street. These trees will utilize existing tree box infrastructure and will be coordinated with the planned street redesign and rain garden placement.

Together, these planned improvements will create a safer, cleaner, and more energy-efficient corridor. By addressing outdated infrastructure and environmental concerns, the city is laying the groundwork for new housing and commercial development that supports economic growth, public health, and long-term neighborhood vitality.

2. Community Need and Community Engagement

a. The Community’s Need for Funding

The downtown neighborhood that forms the Target Area needs Assessment Grant funding because it is where most low-income residents are concentrated in Duluth. The annual median income for the Target Area is \$26,179, or just 38% of the citywide median income of \$69,255. The poverty rate within the Target Area is nearly double the citywide rate and almost five times greater than the statewide rate. (See Table 2 below.) A significant percentage (42%) of the Target Area population does not participate in the labor force. The neighborhood is comprised of individuals and families with extremely low and often fixed incomes who do not possess sufficient resources to undertake reinvestment projects.

Because the Target Area is home to such concentrated poverty, the City of Duluth also has limited options for subsidizing reinvestment. Tax revenues currently raised from this neighborhood are scarcely sufficient for the city to continue maintaining existing infrastructure. The city is currently anticipating a budget shortfall in 2027 and will have to consider a significant increase to the property tax levy, but raising taxes alone will be counterproductive for the population within the Target Area since most are already significantly cost-burdened. Outside investment and federal subsidy will be necessary to change the status quo for this neighborhood.

Without Assessment Grant funding, the Target Area will continue to suffer from disinvestment and decay. By paying for the upfront costs associated with redevelopment of contaminated sites, this grant will help to create the kind of safe, stable, and affordable housing that will directly benefit the neighborhood’s low-income population and revitalize the heart of downtown Duluth.

b. Health or Welfare of Sensitive Populations

The Target Area is home to significant concentrations of sensitive populations and particularly older adults. In one census tract within the Target Area, 29% of the population is comprised of elderly persons living alone. Another census tract within the Target Area has a poverty rate of more than 40%. The percentage of households receiving SNAP benefits within the Target Area is more than double the percentage for Duluth as a whole. Table 2 below gives a more complete snapshot of the sensitive populations living in this neighborhood.

Sensitive Populations, Table 2.⁶

	Target Area (Tracts 16, 17, 19)	City of Duluth	Minnesota
Population	4,119	86,697	5,713,716
Children Under 9yo	5%	10%	12%
Elderly (65+)	19%	18%	17%
Not in Labor Force	42%	30.6%	31.5%
Poverty Rate	31%	17%	6.3%
Median Household Income	\$26,179	\$69,255	\$87,556
Households Receiving Food Stamps/SNAP Benefits	31%	12%	7.6%

These statistics show a concentrated population of Duluth’s most vulnerable residents. Many of the health disparities this community is experiencing (See Table 3 below) correlate to substandard living conditions, barriers to housing or employment, or inability to pay for health care services. New investment within the Target Area will prioritize residential development, with an emphasis on creating or preserving access to affordable housing.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

The Target Area population shows elevated instances of adverse health conditions associated with exposure to hazardous substances. American Community Survey data shows that census tracts within the Target Area range up to the 90th percentile for instances of asthma, up to the 80th percentile for instances of cancer, and up to the 80th percentile

⁶ American Community Survey, 2019-2023 5-Year Data Profile

for instances of disability.⁷ The 2020 Bridge to Health Survey, organized and conducted by dozens of public health organizations across northeast Minnesota and northwest Wisconsin, provides an analysis of the Target Area. The Survey found elevated instances of asthma (18%), high blood pressure (32.1%), lung disease (8%), anxiety, depression, and post-traumatic stress disorder throughout the neighborhood.⁸ These results are summarized in Table 3 below.

Adverse Health Conditions, Table 3⁹

	Target Area (Tracts 16, 17, 19)	Northeast Minnesota
Cancer	8.7%	13.4%
Asthma	18%	13.9%
High Blood Pressure	32.1%	40.8%
Chronic Lung Disease	8%	8.7%
Heart Trouble/Angina	9.2%	12.6%
Chronic Headaches	17.1%	11.1%
Anxiety	44.7%	25.8%
Depression	53.2%	27.7%
Post Traumatic Stress Disorder	20.2%	9.9%

These health conditions correlate with increased exposure to hazardous materials. In addition to elevated instances of buried tanks and other site contamination from past use, many residential units in both the Target Area and the Duluth overall pose threats to health because of their age. More than 50% of housing units in the Target Area were built before 1969, during a period where the use of lead paint in residential construction was common.¹⁰ The reuse strategy for this funding will prioritize access to safe, stable, and affordable housing and support the long-term improvement of health outcomes for Target Area residents.

d. Economically Impoverished/Disproportionately Impacted Populations

The Target Area has one of the highest concentrations of residents living below the poverty level of any neighborhood in Duluth. This neighborhood has a significantly lower median income and significantly higher poverty rate compared to the city as a whole, and nearly a third of all Target Area residents receive SNAP benefits. This economic profile is summarized in Table 2 above.

Prioritizing development of safe and affordable housing for reuse in the Target Area will help this population find greater stability, making it easier to secure employment and maintain personal and family health. Renewed investment throughout the Target Area will help to create accessible jobs and treating the entire downtown as a residential neighborhood will create shared public spaces for community engagement and connection.

Community Engagement

e. Project Involvement & f. Project Roles

Name of Organization	Entity's Mission	Point of Contact (name & email)	Specific involvement in the project or assistance provided
Minnesota Pollution Control Agency	The Minnesota Pollution Control Agency (MPCA) is committed to ensuring that every Minnesotan has healthy air, sustainable lands, clean water, and a better climate.	Crystal Mogensen Crystal.Mogensen@state.mn.us	The MPCA will provide site data and technical expertise to help determine eligibility for EPA funding. The MPCA will also organize at least two community engagement events focused on redevelopment planning within the Target Area.
Downtown Duluth	Downtown Duluth advocates for its members in support of a vibrant, friendly, and	Kristi Stokes kstokes@downtownduluth.com	Downtown Duluth will coordinate community engagement activities for the Target Area and provide

⁷ American Community Survey, 2019-2023 5-Year Data Profile

⁸ Kjos, S.A., Kinney, A.M., Rapps, M.E., Finch, M.D.; Bridge to Health Collaborative. 2020 Bridge to Health Survey: Northeastern Minnesota and Northwestern Wisconsin Regional Health Status Survey. May 2021 (Available from Generations Health Care Initiatives, Inc., Duluth MN)

⁹ Kjos, S.A., Kinney, A.M., Rapps, M.E., Finch, M.D.; Bridge to Health Collaborative. 2020 Bridge to Health Survey: Northeastern Minnesota and Northwestern Wisconsin Regional Health Status Survey. May 2021 (Available from Generations Health Care Initiatives, Inc., Duluth MN)

¹⁰ American Community Survey, 2019-2023 5-Year Data Profile

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	sustainable Downtown Waterfront.		input for determining additional priority sites.
Essentia Health	We are called to make a healthy difference in people's lives.	Kevin Boren Kevin.boren@essentiahealth.org	Essentia Health owns several sites with potential for redevelopment within the Target Area. They will participate in community engagement activities and provide input for determining additional priority sites.
Stepping on Up (CHUM, Union Gospel Mission, Other Service Providers)	Stepping on Up is a consortium of service providers who offer meals, shelter and care to Duluth's unhoused population.	Joel Kilgour joel@steppingonupduluth.org	Stepping on Up is a consortium of service providers who offer meals, shelter and care to Duluth's unhoused population. All are located within the Target Area; several are undertaking coordinated expansion projects that will double their capacity. They will participate in community engagement activities and provide input for determining additional priority sites.
Duluth Housing Partners (Duluth Housing & Redevelopment Authority, One Roof Community Housing, Center City Community Housing)	The city's housing partners are non-profit and government agency developers committed to creating affordable housing in Duluth.	Jeff Corey jcorey@lroofhousing.org Jill Keppers jkeppers@duluthhousing.com Nancy Cashman ncashman@centercityhousing.org	The city's Housing Partners have developed several affordable housing projects within the Target Area and surrounding neighborhoods. They will participate in community engagement activities and provide input for determining additional priority sites.
Heirloom Properties	At Heirloom, we believe everyone deserves a better property experience. From owners growing their investments to residents looking for a dependable place to call home, we're here to make it easier for both.	Mike Schraepfer mike@rentwithheirloom.com	Heirloom Properties is a development company headquartered within the Target Area. They also own several properties with potential for redevelopment within the Target Area. They will participate in community engagement activities and provide input for determining additional priority sites.

g. Incorporating Community Input

Discuss your plan to communicate project progress to the local community, including residents directly affected by the project work, and the involved organizations/entities/ groups. Include the frequency and method(s) you will use (including an alternative to in-person engagement) and how you will meaningfully solicit, consider, and respond to community input.

The City of Duluth will develop a comprehensive outreach strategy in partnership with the organizations identified above in order to solicit community input and provide progress reports related to Brownfields Assessment Grant work. This will include regular public meetings, making revitalization plans for particular sites available on the city website, and keeping an updated database and GIS Brownfields Properties layer showing sites where assessments and RAPs have been completed for public reference. The city will partner with local media to provide updates on assessment work. Beyond public meetings, the city will solicit input via digital surveys and a dedicated email inbox. Community members who provide input during the engagement activities will receive regular updates regarding redevelopment efforts within the Target Area, especially with respect to projects supported by the Assessment Grant.

3.a-d. Task descriptions, Cost estimates, and Measuring progress-Description of Tasks/Activities & Outputs

The City of Duluth will manage the Community-Wide Assessment grant through a coordinated framework that blends local oversight with consultant expertise. The city will procure a Qualified Environmental Professional (QEP) to guide

program management and draw on the consultant's technical team and will hire additional QEPs as needed to perform site-specific assessment work. Within City Hall, the Planning and Economic Development Division and its Internal Brownfields Working Group, representing small business, commercial/industrial, and housing redevelopment, will meet regularly with the QEP to review site nominations, track progress, and ensure activities support community priorities. The City will oversee procurement, financial management, and communication with EPA, while the QEP will assist with technical documentation, ACRES reporting, project tracking, and regulatory coordination.

Task 1- Program Management

- a. **Project Implementation:** A QEP will be selected through a competitive procurement process in accordance with the federal Uniform Grant Guidance at 2 CFR Part 200. The City will finalize the QEP contract and manage all grant administration through the Planning & Economic Development Division. Work includes procurement, financial oversight, coordination of the Internal Brownfields Working Group, and ongoing communication with EPA. The QEP will support ACRES reporting, technical documentation, and regulatory coordination. The city will prepare all required quarterly, annual, and closeout reports, and this task includes attendance at the 2027 National Brownfields Training Conference.
- b. **Anticipated Schedule:** Award in June 2026; a competitive procurement process for the QEP will occur from June through September 2026, with the QEP contract executed by October 1, 2026. Quarterly reports will be submitted each January 30, April 30, July 30, and October 30 beginning January 2027 and continuing through April 2030. Annual DBE reports will be submitted each October beginning in 2027 and continuing through 2029. Closeout will be completed by Q2 FY30 (by June 2030).
- c. **Task/Activity Lead:** The Planning & Economic Development Division will manage grant administration, procurement, financial oversight, and EPA communication, supported by the Internal Brownfields Working Group. The QEP, with City oversight, will assist with ACRES reporting, technical documentation, and regulatory coordination.
- d. **Outputs:** Executed QEP contract, procurement records, administrative files, 16 Quarterly Progress Reports, 4 Annual Financial Reports, 4 DBE Reports, ACRES updates, documentation of travel to the 2027 National EPA Brownfields Training Conference, and one Grant Closeout Report.

Task 2- Brownfield Inventory and Prioritization

- a. **Project Implementation:** This task will update Duluth's brownfield inventory and cloud-based GIS system to document sites of concern citywide, with emphasis on the Target Area and Priority Sites. QEP will compile site data, maintain GIS layers, prepare updated maps, and apply the City's prioritization matrix. The City will coordinate site nominations, conduct property owner outreach, collect historical records, and verify site information to ensure the inventory remains accurate, current, and actionable for selecting assessment sites.
- b. **Anticipated Project Schedule:** Work will begin in Q1 FY27 (Oct-Dec 2026), with the initial inventory update and prioritization completed by Q2 FY27 (Jan-Mar 2027). Annual updates will occur in Q1 FY28 (Oct-Dec 2027), Q1 FY29 (Oct-Dec 2028), and Q1 FY30 (Oct-Dec 2029).
- c. **Task/Activity Lead:** The Planning & Economic Development Division will oversee the inventory process and coordinate site nominations with the Internal Brownfields Working Group. The QEP will compile the updated inventory, manage GIS data, and apply the prioritization matrix, supported by City GIS staff.
- d. **Outputs:** Outputs will include updated GIS inventory files and maps, an inventory report summarizing site data and counts, owner contact and access records, and a prioritization memorandum with a ranked list of sites ready for assessment.

Task 3-Phase I and II ESAs, Supplemental Site Investigations, Remedial Action Plans, Revitalization Planning

Project Implementation: This task represents the largest portion of the Community-Wide Assessment budget and includes all technical environmental assessment and planning activities needed to advance priority brownfield sites toward reuse. QEPs will prepare 2 QAPPs and complete 4 QAPP updates over the grant period. The QEP will complete 10 eligibility determinations and access agreements and conduct 8-10 Phase I ESAs for sites identified through the prioritization process. QEPs will also develop Sampling and Analysis Plans and complete 5 Phase II ESAs in accordance with ASTM and MPCA/EPA guidance. Where additional data are required, 2-3 supplemental investigations will be completed. Technical work will further include preparing 3 Response Action Plans and developing 1-3 revitalization plans for priority redevelopment sites. Activities will be supported by field mobilization, sampling and laboratory analysis, data evaluation, and preparation of technical reports required for EPA review. Eligibility determinations will be submitted to EPA/MPCA as required. Costs reflect typical ranges for assessment activities and may vary based on site size, complexity, and contaminant conditions.

Anticipated Project Schedule: QAPP preparation and updates, eligibility determinations, access agreements, and Phase I ESAs will begin in Q1 FY27 (Oct-Dec 2026) and continue through FY28. Sampling and Analysis Plans, 5 Phase II ESAs, and 2-3 supplemental investigations will occur during FY28-FY30 (Jan 2028-Mar 2030). 3 Response Action Plans and 1-3 revitalization plans will be completed by Q2 FY30 (June 2030), supported by ongoing fieldwork, sampling, and technical reporting.

Task/Activity Lead: The Planning & Economic Development Division will oversee site selection, eligibility determinations, and access agreements. QEPs will complete all technical work including 2 QAPPs, 4 QAPP updates, 10 EDRs, 8-10 Phase I ESAs, 5 Phase II ESAs, 2-3 supplemental investigations, 3 Response Action Plans, and 1-3 revitalization plans with City oversight and review.

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Outputs: 2 QAPPs, 4 QAPP updates, 10 eligibility determinations and access agreements, 8–10 Phase I ESAs, 5 Phase II ESAs with Sampling and Analysis Plans, 2–3 supplemental investigation reports, 3 Response Action Plans, and 1–3 revitalization plans with public charrette documentation.

Task 4- Community Outreach

Project Implementation: This task will support community engagement throughout the grant period and will follow the guidance outlined in the Community Involvement Plan. The city will host neighborhood meetings and focused site workshops and will coordinate outreach with neighborhood organizations and Tribal partners. All outreach opportunities will include opportunities for virtual or in-person participation. The QEP will prepare technical outreach materials—including fact sheets, press releases, community survey materials and web content—and assist in presenting assessment findings. The city will maintain project information on its website and collect and document community input for integration into prioritization and reuse planning.

Anticipated Project Schedule: Outreach activities described in the Community Involvement Plan will begin in Q1 FY27 (Oct–Dec 2026). Quarterly neighborhood meetings will continue through FY30 (Oct 2026–June 2030), with focused workshops held as assessment activities progress. A final public summary will be available via the website in Q2 FY30 (by June 2030).

Task/Activity Lead: The Planning & Economic Development Division will lead all outreach and engagement activities, including implementation of the Community Involvement Plan, supported by the Internal Brownfields Working Group. The QEP will prepare outreach materials, assist with presentations, and document community feedback.

Outputs: Outputs will include a Community Involvement Plan; meeting agendas, notes, and sign-in sheets; outreach materials such as fact sheets and press releases; updated project webpage content; documented community input; and a final public engagement summary available on the city’s website.

3.e. Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		Program Management	Inventory/ Prioritization	Assessments/ Planning	Administrative Costs	
Direct Costs	Personnel	40,000	10,000	20,000	10,000	80,000
	Fringe Benefits	12,000	3,000	6,000	3,000	24,000
	Travel ¹	9,000	3,000	4,000	2,500	18,500
	Equipment ²	--	--	--	--	0
	Supplies	2,000	2,000	2,000	2,500	8,500
	Contractual	49,500	28,000	289,500	0	367,000
	Construction ³	--	--	--	--	0
	Other (include subawards, conference registration fees, and specific participant support costs such as stipends) (specify type)	--	--	2,000	--	2,000
Total Direct Costs⁴						
Indirect Costs⁴						
Total Budget (Total Direct Costs + Indirect Costs)		112,500	46,000	323,500	18,000	500,000

Task 1 = Program Management: Total Budget= \$112,500

Cost Basis and Assumptions: Personnel/Fringe at \$58,500 (780 hr. \$75/hr.), Contractual at \$45,000 (300 hr. @ \$150/hr), and Travel at \$9,000 (3 staff to 2027 National Brownfields Training Conference: lodging, per diem, registration, airfare, ground transportation).

Task 2 = Brownfield Inventory and Prioritization: Total Budget= \$46,000

Cost Basis and Assumptions: Contractual at \$34,500 (230 hr @ \$150/hr) and Personnel/Fringe at \$11,500 (115 hr @ \$100/hr). (Note: The costs for conducting Phase I and Phase II ESAs will vary depending upon the size of the properties and extent of the contamination present; costs are based upon the City’s experience with past grants.)

Task 3 =Phase I and II ESAs, Supplemental Site Investigations, Remedial Action Plans, Revitalization

Planning: Total Budget= \$323,500

Cost Basis and Assumptions: QAPPs/QAPP Updates at \$7,500, Phase I ESAs at \$3,500–\$5,000 each (8–10 total), Sampling & Analysis Plans/HASPs at \$5,000–\$7,500 each, Phase II ESAs at \$8,000–\$20,000 each (5 total), Supplemental Investigations at \$10,000 each (2–3 total), Response Action Plans at \$5,000–\$7,500 each (3 total), and Revitalization Plans at variable cost (1–3 total).

Task 4 = Community Outreach: Total Budget= \$18,000

Cost Basis and Assumptions: Personnel/Fringe at \$10,000 (100 hr @ \$100/hr), Contractual at \$4,000 (27 hr @ \$150/hr), and Supplies/Meeting Costs at \$4,000. * *These expenses are distributed across multiple budget categories in the budget table.*

3.f Plan to Measure

The City of Duluth has a long record of managing federal grants and delivering projects in full compliance. The Planning and Economic Development Division regularly administers HUD, DOT, EDA, and EPA awards, supported by an enterprise financial system with segregated fund accounting, automated grant coding, and strong procurement controls to ensure accurate, audit ready management. The City's procedures help ensure timely completion of all grant outputs, including Phase I and Phase II ESAs, QAPP updates, Response Action Plans, revitalization plans, and community meetings. The QEP will conduct the Phase I and Phase II ESAs and prepare all QAPP updates, Response Action Plans, and revitalization plans, with the City overseeing and reviewing all technical work. As sites advance toward reuse, the City will track outcomes such as acres assessed, sites moving into redevelopment, reduced exposure to contaminants, and private investment leveraged. Because many outcomes occur after close out, the City will continue to share redevelopment updates and documentation with EPA. Project schedules and deliverables are monitored through internal tracking tools, shared spreadsheets, ACRES reporting, quarterly and annual reports, and regular meetings of the Internal Brownfields Working Group. These systems allow staff to monitor progress, document results, and make adjustments as needed to keep the project on schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Organizational Capacity

The City of Duluth has a long and proven track record of successfully managing EPA Brownfields grants, supported by more than a decade of strong internal systems, cross-departmental coordination, and consistent program performance. The Brownfields program is led by Angie Stier, Economic Developer, along with two additional Economic Developers who collectively guide project implementation, stakeholder engagement, and redevelopment planning.

This structure builds on the City's history of successfully managing EPA Brownfields grants including cleanup and RLF awards and ensures the organizational capacity needed to effectively deliver the proposed project. The City's established processes, strong partnerships, and dedicated staff, position Duluth to continue advancing impactful, compliant, and community-driven Brownfields work.

4.b. Organizational Structure

The City of Duluth's Planning and Development Division will serve as the lead agency, bringing extensive experience managing federal grants and environmental programs. The Division regularly administers complex projects in compliance with 2 CFR 200.317–200.326 and will oversee all technical, administrative, and financial components of the assessment grant. The project will also benefit from coordination across key City departments and ongoing guidance from the U.S. EPA. Staffing redundancy—including two additional economic development staff and a Manager who tracks project progress—ensures consistent oversight and continuity throughout the grant term.

4.c. Description of Key Staff

Angie Stier – Economic Developer & Brownfields Program Lead

Angie serves as the lead for the City of Duluth's Brownfields Program and will manage day-to-day implementation of the Assessment Grant. She oversees project coordination, QEP management, site selection, community engagement, and reporting. Her work supporting small businesses and redevelopment projects positions her to effectively guide assessment activities and ensure alignment with community and economic development goals.

Thomas Church – Senior Housing Developer

Tom leads the City's housing development initiatives, bringing expertise in multifamily, affordable, and mixed-income projects. He supports Brownfields efforts by evaluating redevelopment feasibility, aligning sites with housing needs, and coordinating with developers to advance projects that deliver community benefits. His experience strengthens the City's ability to move assessed sites toward productive reuse.

Amanda Anderson – Economic Developer (Industry & Large Employers)

Amanda manages business retention, expansion, and recruitment for Duluth's major employers and industrial sectors. She contributes to Brownfields implementation by identifying redevelopment opportunities that support job creation, engaging industry partners, and ensuring that assessed sites align with broader economic development strategies. Her role helps position sites for successful reuse and private investment.

4.d. Acquiring Additional Resources

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The City of Duluth will retain a Qualified Environmental Professional (QEP) to complete all technical work required under this Assessment Grant. If additional contractor support is needed, the City will procure services in full compliance with 2 CFR 200.317–200.326 and 2 CFR Part 1500. Duluth follows procurement standards and promotes fair, competitive contracting practices that support local economic participation. The City also actively encourages the use of MBE/WBE subcontractors consistent with EPA’s Six Good Faith Efforts.

4.e. Currently Has or Previously Received an EPA Brownfields Grant

Brownfield Revolving Loan Fund Supplemental Award (FY2022; \$1,000,000-10/01/2022-09/30/2027):

(4.e.1) Accomplishments:

The City received a \$1 million supplemental RLF award on to expand its cleanup financing capacity, strengthening Duluth’s ability to support brownfield cleanup projects, accelerate site readiness, and leverage private investment. The award remains open, with remaining funds committed to eligible cleanup activities now progressing through project development. The City is working with MSA Professional Services to finalize updated program guidelines and loan/subgrant procedures to ensure timely and compliant deployment. All accomplishments and site data to date have been entered into ACRES.

(4.e.2) Compliance with Grant Requirements:

The City is meeting all work plan, schedule, and reporting requirements. Quarterly reports, financial documentation, and ACRES updates are current, and no deviations or missed deliverables have occurred. Remaining funds are unspent only because activities are underway, and the City is on track to fully expend the award within the performance period. The City remains in full compliance with EPA requirements.

Community-Wide Assessment Grant (FY2019; \$150K Petroleum & \$150K Hazardous Substances)

(4.e.1) Accomplishments:

Outputs included procurement of three environmental consulting firms, preparation of two QAPPs, completion of 12 EDRs and Phase I ESAs, advancement of 8 sites to Phase II ESAs, and development of one cleanup plan and a market study. Outcomes included five sites moving into or completing redevelopment, resulting in new commercial activity, job creation, and increased tax revenue. All project milestones and site data were entered into ACRES.

(4.e.2) Compliance with Grant Requirements:

The City met all work plan, schedule, and reporting requirements throughout the performance period. Quarterly and annual reports were submitted on time, ACRES entries were completed and verified, and all deliverables were finalized within the grant term. No deviations occurred, and the grant closed with no unspent funds.

Community-Wide Assessment Grant (FY2014; \$200K Petroleum & \$200K Hazardous Substances)

(4.e.1) Accomplishments:

Outputs included convening 24 TAC meetings, procuring three environmental consulting firms, and completing 25 EDRs, 16 Phase I ESAs, eight Sampling and Analysis Plans/Phase II ESAs, two Hazardous Materials Surveys, and one Historic District Re-Evaluation under approved QAPPs. Outcomes included two sites moving into redevelopment, supporting new housing and commercial uses and contributing to neighborhood revitalization. All accomplishments were entered into ACRES.

(4.e.2) Compliance with Grant Requirements:

The City met all work plan, schedule, and reporting requirements. Quarterly and annual reports were submitted on time, ACRES entries were completed and verified, and all deliverables were finished within the performance period. No deviations occurred, and the grant closed with no unspent funds.