



# CITY OF MANITOWOC

WISCONSIN, USA

[www.manitowoc.org](http://www.manitowoc.org)

**RE: Grant Proposal by the Community Development Authority of the City of Manitowoc, Wisconsin to the United States Environmental Protection Agency for a Brownfield Cleanup Grant for the Phase 4 Redevelopment Area of the River Point District Located at 1110 Chicago Ave; Manitowoc, Wisconsin**

The Community Development Authority of the City of Manitowoc, Wisconsin (CDA) is pleased to submit the enclosed proposal to the United States Environmental Protection Agency (USEPA) for a cleanup grant for \$3,857,589 as part of the USEPA Fiscal Year (FY) 2026 Brownfield Grant Competition.

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

**1. Applicant Identification**

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

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

**3. Funding Requested**

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$3,857,589

**4. Location**

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

**5. Property Information**

- a. Property Name: Phase 4 Redevelopment Area
- b. Property Address: 1110 Chicago Avenue; Manitowoc, Wisconsin 54220

**6. Contacts**

- a. Project Director - Community Development Authority of the City of Manitowoc:  
Name: Adam Tegen, Executive Director of the Community Development Authority of the City of Manitowoc  
Phone: (920) 686-6931  
Email address: [ategen@manitowoc.org](mailto:ategen@manitowoc.org)  
Mailing Address: 900 Quay Street; Manitowoc, WI 54220



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b. Chief Executive/Highest Ranking Elected City Official

Name: Justin Nickels, Mayor of the City of Manitowoc

Phone: (920) 686-6980

Email address: [jnickels@manitowoc.org](mailto:jnickels@manitowoc.org)

Mailing Address: 900 Quay Street; Manitowoc, WI 54220

7. **General Population (2023 US Census Bureau Estimate)**

a. City of Manitowoc = 34,553 (source: [policymap.com](http://policymap.com), with subscription)

8. **Other Factors**

Other Factors	Page #
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed site is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	P.2 – P.3; Attachment A
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	P.1; Attached Map
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed site(s) will incorporate energy efficiency measures.	P.2
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	P.2
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

9. **Releasing Copies of Applications**

Not Applicable



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

(1.a) 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 (River). Development in Manitowoc began in the early 1800s by European settlers for agriculture, fishing, lumber, and shipbuilding. Settlement was followed in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries by large-scale industrial development in Block Group 550710004003 (BG-5), the historic industrial block of Census Tract 55071000400 (CT-4). Production skyrocketed in the late 19<sup>th</sup> century, and manufacturers soon needed a better way than local rail alone to transport vast quantities of goods to and from Manitowoc. Enter: the “River Point District”, the **Target Area** within BG-5 & CT-4. The River Point District forms a 20-acre peninsula into the Manitowoc River with 3,500 linear feet of frontage, which made it uniquely suitable for development as a site-wide railroad yard and shipping port in the late 19<sup>th</sup> century. This bimodal port offered direct rail access, meaning locally manufactured goods could now be carried by rail directly from City factories and driven onto cargo ships at the River Point District for transport and delivery to ports throughout the Great Lakes, resulting in rapid industrial growth and economic prosperity in the area through the 20<sup>th</sup> century. Unfortunately, the City’s industrial sector collapsed in the 1970s due to offshoring and market conditions, creating hundreds of brownfield sites in this once-prosperous maritime community, including abandoned rail and petroleum distribution infrastructure, a former manufactured gas plant, empty commercial buildings, gasoline stations, and other vacant/underutilized lots. Our existing inventory has already identified over 172 parcels of land (132 acres) in CT-4 alone, resulting in a **36% decrease in population** and a **211% increase in families living in poverty** in CT-4 since 1970.<sup>1,2</sup> Brownfields in the City have led to significant blight and environmental impacts, poor economic condition, psychological drain, and risks to community welfare. The adjacency of the Target Area to the River and its proximity to downtown makes redevelopment especially attractive to a community seeking relief from long-endured hardship. However, the City is not capable of addressing the insurmountable financial challenges associated with cleaning up environmental contamination in Target Area exceeding state cleanup levels without assistance from the US Environmental Protection Agency (EPA) Brownfield program. The greatest needs to be addressed by cleanup and redevelopment within the Target Area with the aid of this grant are: (1) increasing residential workforce and low-to-moderate income (LMI) housing options to support rebuilding the downtown commercial district; (2) increasing commercial and appealing retail amenities to provide jobs and attract outside businesses; and (3) expanding green space and local multi-modal trail networks to connect the community to the River. The cleanup and redevelopment of the Target Area is consistent with this community’s needs and will generate catalytic improvements to the quality of life in the City by addressing significant blight, recovering from poor economic conditions, and improving welfare.

(1.b) Description of the Proposed Brownfield Site. After decades of negotiations, the Community Development Authority of the City of Manitowoc (**CDA; the grant applicant**) acquired the Target Area in April 2019 for the purpose of blight elimination and has invested over **\$16,000,000** at the River Point District to date, including **\$2,000,000** at the “Phase 4 Redevelopment Area” (herein referred to as the **“Target Property”**). The Target Property spans 3.4 acres of five contiguous parcels of land, forming the northern portion of the River Point District. All structures at the Target Property were removed by February 2025. Now unoccupied, the Target Property represents the greatest potential to catalyze immediate economic investment in downtown Manitowoc. However, soil and groundwater are known to be impacted by heavy metals, cyanide, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), and per- and polyfluoroalkyl substances (PFAS) from the Target Area’s past use as a railyard, bulk petroleum storage, and from historic anthropogenic fill placed in the late 19<sup>th</sup> century. Without cleanup, these contaminants jeopardize community health, especially sensitive populations in the Target Area who have elevated risks of developing severe health conditions from exposure. The Target Property borders 1,000 feet of the Manitowoc River shoreline, which flows to Lake Michigan approximately 1.2 miles downstream. The proximity of contaminants at the Target Property to the River additionally puts surface water and fishery quality at risk until cleanup occurs.

## 1.c-d Project Area Description and Plans for Revitalization – Revitalization of the Target Area

(1.c) Reuse Strategy and Alignment with Revitalization Plans. Remediation performed under this grant will prepare the Target Property for future multi-family residential redevelopment with multi-modal public trails and green space along the River. The current *City of Manitowoc Comprehensive Plan*, the *Downtown & River Corridor Master Plan*, the *Comprehensive Outdoor Recreation Plan*, and the *Tax Incremental District Nos. 16 & 22 Project Plans*<sup>3</sup> (collectively referred to herein as the “Plans”) will guide the proposed cleanup and redevelopment of the Target Area. The Plans were created as collaborative efforts between the City and its residents to align reuse and revitalization goals with priorities and needs expressed by community members and members of the Brownfields Advisory Committee (BAC) during public meetings/charettes. For example, the community expressed struggling with a severe lack of housing in the downtown area and lack of diverse commercial/recreational amenities; therefore, redevelopment and reuse goals outlined

<sup>1</sup> 2019-2023 Data available online at [policymap.com](http://policymap.com) with subscription

<sup>2</sup> 1970 Data available online at [socialexplorer.com](http://socialexplorer.com) with subscription

<sup>3</sup> Community Plans available at [www.manitowoc.org/299/Community-Plans](http://www.manitowoc.org/299/Community-Plans)

Target Area = BG-5 in CT-4; Target Property = Phase 4 Redevelopment Area of the River Point District; CDA = Community Development Authority (grant applicant); BAC = Brownfield Advisory Committee; WDNR = Wisconsin Department of Natural Resources

in the *Plans* for the Target Property have been tailored to (1) provide affordable multi-family housing and increase residential opportunities in the downtown area, (2) generate business opportunities that stabilize the area, and (3) increase access to greenspace, the River, and multimodal trails. By increasing recreational access to the River, the Target Property will become a destination space to spur additional commercial investment in downtown Manitowoc. The reuse strategy for the Target Property considers that the River channel is defined by the Federal Emergency Management Agency (FEMA) as a regulatory floodway (Zone AE)<sup>4</sup>. The Target Property, however, is **not** located within a federally designated flood plain; the regulatory floodway will not be disturbed by proposed redevelopment.

**(1.d) Outcomes and Benefits of Reuse Strategy.** This redevelopment is shovel-ready. A developer is identified and will acquire the Target Property following cleanup (Attachment A3). Target Property redevelopment will consist of 20 new multi-family affordable and Americans with Disabilities Act (ADA)-compliant townhomes (**\$3,000,000** in private leverage generating **\$50,000** in new property taxes each year); site plans included in the Analysis of Brownfield Cleanup Alternatives (ABCA; Attachment B3) illustrate a continuation of the riverside multi-modal trail, two park spaces, an amphitheater, and an extension of Chicago Street. Construction will begin in Q3 2027. Increased residential density will create a demand for supporting commercial uses at the River Point District. As there are currently **no** full service grocery stores in CT-4, future Target Area commercial development will include a grocery store/food co-op. This reuse strategy is consistent with the *Plans* to further serve food insecure members of the community. Other proposed commercial uses at the River Point District include restaurants and “maker-spaces” to support micro-businesses. Commercial redevelopment at the River Point District in 2026-2029 is estimated to leverage **\$5,000,000** in private investment.

Manitowoc is a coastal city with 7 miles of shoreline along Lake Michigan. Water levels in Lake Michigan rapidly rose over six feet from a record low in 2013, to a record high in 2020, and have since dipped rapidly through 2025<sup>5</sup>. These significant fluctuations threaten coastal infrastructure via shoreline erosion and flooding in low lying areas, and increase the chance/severity of storm surge damage during extreme weather events. Proposed redevelopment at the Target Property will incorporate extensive green space and native plantings to stabilize shoreline soils and control erosion during heavy rainfall events. A biofiltration pond will be constructed to control runoff to the River and manage stormwater onsite. The upland location of the proposed townhome buildings further maximizes their distance from the River’s edge. These approaches will improve long-term local resilience to extreme storm and flooding events.

The City will require all new construction (both residential and commercial) to incorporate energy efficiency in the building and mechanical designs, with the *Plans*’ goal of having all new structures qualify for Leadership in Energy and Environmental Design (LEED) certification. LEED-certified buildings meet important energy efficiency and green building measures that minimize environmental impacts, and have been found to contribute up to 50% less greenhouse gas emissions from water consumption, 48% less from solid waste management, and 5% less from transportation emissions compared to conventional construction.<sup>6</sup>

Redevelopment of the Target Property will include remediation and construction of 2.2 acres of new landscape/greenway and 1.2 acres of trails/pavement, tying the Target Property and its 1,000 feet of River frontage directly to the City’s existing multi-modal trail network. New parks/greenways will allow for additional recreational opportunities for disadvantaged members of the community, who often struggle to have equitable access to natural areas. These amenities are critical for community health as current River access is limited, with the nearest access points being 1) 0.5 miles downstream on the opposite side of the peninsula, and 2) at the marina 1.2 miles downstream at the River’s confluence with Lake Michigan. Cleanup and redevelopment of the Target Property will have cascading effects for the surrounding Target Area by extending the gateway to the River Point District, a major goal of the *Plans*. Outcomes and benefits of this reuse strategy in the Target Area include installing 5,000 linear feet of new sidewalks and multi-modal trails linking to the regional trail network, and constructing over 560,000 square feet (ft<sup>2</sup>) of new multi-family residential buildings and 40,000 ft<sup>2</sup> of commercial space (estimated leverage **\$116,000,000** to **\$250,000,000** in private investment). Housing and job opportunities created in the Target Area will directly benefit residents through intentional inclusion strategies to hire locally, foster startups and entrepreneurship, and provide housing options.

### **1.e-h Project Area Description and Plans for Revitalization – Strategy for Leveraging Resources**

**(1.e-g) Resources Needed for Site Characterization, Site Remediation, and Site Reuse.** Leverage and coordinated public funding are cornerstones of the Manitowoc brownfields program. The CDA has leveraged **\$31,170,000** in local, state, federal, and private redevelopment funding in previous phases of Target Area redevelopment, leaving us with limited additional resources to draw upon in the near term. EPA cleanup grant funding in addition to the relevant leveraging resources described below **will be sufficient** to complete the proposed remediation and reuse of the Target Property. As described in **Table 1**, this shovel-ready project will provide an immediate catalyst for securing additional external funds.

<sup>4</sup> [fema.gov/flood-maps](https://fema.gov/flood-maps)

<sup>5</sup> [weather.gov/lot/LakeMichiganHighWater](https://weather.gov/lot/LakeMichiganHighWater)

<sup>6</sup> [usgbc.org/articles/top-10-reasons-certify-leed](https://usgbc.org/articles/top-10-reasons-certify-leed)

Table 1: Funding Resources to Leverage for Site Characterization, Remediation & Reuse		
Name of Resource: Manitowoc CWA Brownfield Grant (FY25)	Purpose: 1.e - Characterization	Status: Secured (Attachment A1)
	Additional Details: \$500,000 awarded in August 2025. Funds from this grant can be used to address unforeseen environmental conditions encountered during Target Property construction.	
Name of Resource: WDNR Wisconsin Assessment Monies Grant	Purpose: 1.e - Characterization	Status: Secured (Attachment A2)
	Additional Details: \$75,000 awarded in July 2024 to complete a Site Investigation/Remedial Action Plan at Target Property. This investigation work will be completed by February 2026.	
Name of Resource: WEDC (State) Brownfield Cleanup Grant	Purpose: 1.f - Remediation	Status: Secured; (Attachment A3)
	Additional Details: The CDA was notified of award of a \$250,000 Wisconsin Economic Development Corporation (WEDC) Brownfield Cleanup Grant in January 2026 and will use this FY26 EPA Cleanup Grant as its required 30% match.	
Name of Resource: Manitowoc Brownfield Cleanup RLF	Purpose: 1.f - Remediation	Status: Eligible; Unsecured
	Additional Details: The CDA is eligible to pursue a loan under the City’s Brownfield Cleanup RLF (up to \$200,000) for remediation at the Target Property, if additional cleanup is needed.	
Name of Resource: Private Developer (Residential)	Purpose: 1.g – Reuse (Acquisition/Construction)	Status: Secured (Attachment A4)
	Additional Details: The developer of the multi-family residential units will acquire the Target Property following cleanup and has secured 100% of the funds needed for construction.	
Name of Resource: Tax Incremental Financing (TIF-22)	Purpose: 1.g – Reuse (Infrastructure)	Status: Secured (Attachment A5)
	Additional Details: The City has budgeted \$3,500,000 for installation of new utilities and construction of rights of way at the Target Property in 2026.	

(1.h) Use of Existing Infrastructure. The cleanup and subsequent redevelopment of the Target Property will make use of existing infrastructure, including **\$3,500,000** in new utility and rights of way infrastructure constructed in the River Point District (planned/budgeted as noted in **Table 1**). Redevelopment will leverage recent community-wide infrastructure investments made by the City, including upgrades to the drinking water Microfiltration Plant (**\$3,800,000** funded through the *American Rescue Plan Act of 2021*) and wastewater treatment plant (**\$9,000,000**). To enhance the walkability in the Target Area, since 2012, the City has replaced defective/deteriorated sidewalks with new concrete walkway along 14.7 miles of roadway at an estimated expenditure of **\$300,000**. To combat blight and reduce crime, the City has installed decorative street lighting, new concrete curb and gutter and sidewalks, new asphalt pavement, trash receptacles, benches, and trees in portions of the Target Area (**\$135,000**). Additional leverage includes broader infrastructure investments made by the City, such as expanding utility access and improve integration of the complete streets (i.e., bikeable/walkable) concept. A bus stop is located adjacent the Target Area and connects the community to the transportation center south of the Target Property, uniquely positioning the Target Property to facilitate a variety of public transportation options.

**2.a-d Community Need and Community Engagement – Community Need**

(2.a) The Community’s Need for Funding. This grant will meet the needs of a community that is unable to draw on other sources to fund remediation due to a small

Table 2. Indicators of Small Population & Low Income <sup>1,2</sup>	Target Area Data		Local, State & National Comparisons			
	BG-5	CT-4	City	County	State of WI	US
Population (% change since 1970)	572	3,937 <b>(- 36 %)</b>	34,553 (+ 3 %)	81 K (+1 %)	5.9 M (+ 33 %)	332 M (+ 64 %)
% Families in poverty (% change since 1970)	(data not available)	<b>16%</b> <b>(+ 211 %)</b>	10% (not avail.)	6% (+ 13 %)	7% (- 11 %)	9% (- 18 %)
% Families in deep poverty		<b>5.2%</b>	4.6%	2.8%	2.7%	3.8%
Mean household income	<b>\$64,479</b>	<b>\$61,190</b>	\$62,133	\$68,611	\$75,670	\$78,538
% Homeowners severely cost-burdened	<b>19%</b>	<b>10%</b>	7%	6%	7%	9%
% Renters severely cost-burdened	<b>59%</b>	<b>22%</b>	16%	15%	19%	24%

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

population and low income attributed to job losses, exacerbated by limited or restricted state/local funding. While some funding has specific designation for utilities, construction, etc., few sources are available for remediation on this scale. Further, municipal funds are restricted by law for designated purposes, and lenders would not loan remediation funds without egregious interest rates/terms. Key indicators of disproportionately impacted populations summarized on **Table 2** reflect gradual decline in economic condition since 1970 when manufacturing was the economic foundation in Manitowoc. Following the collapse of the manufacturing sector in 1970, the Target Area experienced a **36% decrease in population** and a **211% increase in families living in poverty<sup>1,2</sup>**, displaying this area’s critical need. Household income in the Target Area is 10% less than the rest of the county or state, yet another indicator of economic inequality.

**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 Community Development Block Grants that could be a key source of cleanup funding. Though its population of 34,553 is fairly small, the City is too large to receive US Dept. of Agriculture brownfield funds (e.g., housing grants to develop/rehabilitate properties for low-income, elderly, disabled individuals, and their families).

Target Area = BG-5 in CT-4; Target Property = Phase 4 Redevelopment Area of the River Point District; CDA = Community Development Authority (grant applicant); BAC = Brownfield Advisory Committee; WDNR = Wisconsin Department of Natural Resources

**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 has resulted in major job losses. For example, when a prominent aluminum plant closed in 1986, the initial economic impact was the loss of \$19,000,000 in annual wages and benefits associated with the 1,150 eliminated manufacturing jobs. The county has lost over 20% of its manufacturing base since 2000<sup>7</sup>, and in 2020 the region’s higher education sector was dealt a major blow when Holy Family College closed (110 jobs). Continued job loss has resulted in decrease in sales/property tax revenue that would otherwise be available to complete the necessary cleanup at the Target Property and transform it into the mixed residential, commercial, and recreational reuses that the community needs and desires.

**Limited City/State Funding.** To date, the City has spent **\$4,071,000** to abate asbestos, demolish former blighted buildings, and complete environmental investigations at the Target Property. Apart from funding resources listed in **Table 1**, the City has exhausted all other state-funded cleanup grant opportunities. Given the vast amount of other City projects, it is clear the City has expended all available local resources for the project and desperately needs EPA assistance to remediate the site and bring the reuse goals for this project to reality.

**(2.b) Health or Welfare of Sensitive Populations.** In the Target CT, there are **1,140** residential parcels within 300 feet of potential brownfields in addition to **11** churches, **12** schools/clinics, and **9** daycares, which places susceptible sensitive groups at substantial exposure risk from brownfields. As summarized on **Table 3**, sensitive populations in the Target Area include minorities, women, elderly, disabled, and children whose health and welfare are impacted by current and historical local economic conditions. **16%** of families in the Target Area live in poverty, which is **more than double** the state poverty rate (7%). **a 211% increase in the poverty rate** since 1970 (**Table 2**). Today, **nearly half** of the Asian population in the Target Area lives in poverty. Of note, Hmong are the City’s largest single minority group, accounting for more than 60% of the Asian population.<sup>8</sup> The City has a concerning gender-based pay gap, with women currently earning only 63 cents for each dollar earned by men.<sup>9</sup> With nearly 2/3 of all City residents in poverty being female, and with future earning potential of a female growing up in unfavorable economic conditions in the Target Area being 37% less than their male counterparts, multi-generational poverty is difficult to overcome. Poverty in the Target Area persists with the aging population, as the rate of people over 65 years of age living in poverty **quadrupled** from 3% to 14% over the past decade, significantly greater than the state, county and US poverty rates for the elderly.<sup>1</sup> 30% of people with a disability live in poverty, and child poverty in the Target Area is more than **double** that of the state. Key welfare issues to the sensitive populations are: 1) lack of affordable and safe/healthy housing, and 2) access to healthy foods to combat childhood obesity and decreased quality of elder living.

**Lack of Healthy Housing:** Healthy workforce and LMI housing is a significant need in the City. Housing stock is very old in the Target Area (**99%** of homes in CT-4 were constructed prior to the ban on consumer lead paint in 1978)<sup>1</sup> which complicates finding healthy housing. Further, the median home value in BG-5 (\$129,600) is only 52% that of the state median<sup>1</sup>, confirming that income is not fairly distributed and finding healthy housing, especially for single mothers with children in poverty, is an insurmountable challenge. In BG-5, **19%** of homeowners and **59%** of renters are severely burdened by housing costs, dedicating over half of their household income to housing/rental costs; these rates of severe cost burdens are **double to triple** the rates for the county, state, and US (**Table 2**). This unfortunately limits sensitive populations to residential areas where deteriorating lead-based paint and asbestos is present, putting children at high risk for exposure.

**Healthy Food Access and Security:** Food insecurity continues to be a significant welfare issue in the Target Area. CT-4 is considered a “Low Access” area by the US Department of Agriculture indicating community members travel more than 0.5 miles to the grocery store, which complicates access to healthy food for the 10% of households in BG-5 that do not have a vehicle<sup>1</sup>. Local fishery quality is also at risk, as WDNR issued a fish consumption advisory for the Manitowoc River for PFAS<sup>10</sup>, a constituent of concern at the Target Property. Due to current River access limitations (described in Section 1.d), community members frequently fish from the pier at a Superfund site less than 0.1 miles upstream from the Target Property, where cleanup is still ongoing and signs are posted to warn the public of residual contamination. These

Table 3. Poverty & Sensitive Populations <sup>1</sup>	Target Area (CT-4)	Local Comparisons	
		City	State of WI
Asian Population (% Asian in Poverty)	6% <b>(47%)</b>	5% (14%)	3% (14%)
Female Population (% Female in Poverty)	55% <b>(61%)</b>	50% (63%)	50% (55%)
Elderly, 65 and older (% Elderly in poverty)	20% <b>(14%)</b>	22% (14%)	18% (9%)
Disabled citizens (% Disabled in poverty)	14% <b>(30%)</b>	15% (28%)	12% (21%)
Children, < 18 years (% Children in poverty)	21% <b>(30%)</b>	22% (19%)	22% (13%)

Underlined indicates worse conditions than City; **BOLD & RED** is worse than WI; **shading** is worse than all local comparisons

<sup>7</sup> [economicdevelopment.wisc.edu/files/2019/05/Manufacturing\\_Full-report.pdf](https://economicdevelopment.wisc.edu/files/2019/05/Manufacturing_Full-report.pdf)

<sup>8</sup> <https://www.htrnews.com/story/news/local/2022/02/26/manitowoc-hmong-population-wisconsin-marks-path-first-proclamation/6655577001/>

<sup>9</sup> <https://www.neilsberg.com/insights/manitowoc-wi-income-by-gender/>

<sup>10</sup> <https://apps.dnr.wi.gov/fishconsumptionadvisoryquery/>

advisories are critical to the local Hmong (population of 1,137 in the City) where language barriers exist and exposure risk is not always understood, but with whom fishing is a popular sport. Based on a study in a nearby community that found more than 60% of Hmong residents participated in fishing, the health of more than 680 Hmong residents in Manitowoc may be impacted by the fish advisory.<sup>11</sup>

**Improve Health and Welfare.** Cleanup and redevelopment of the Target Property for residential and commercial uses aided by this EPA grant will improve welfare conditions by increasing healthy housing, increasing job options in affected neighborhoods, decreasing contaminant sources, and making the Target Area safe and walkable. Overall health and well-being will increase with cascading neighborhood improvements such as access to food (new stores) and increased recreation by safer/walkable areas.

#### (2.c) Greater Than Normal Incidence of Disease and Adverse Health Conditions.

**Asthma.** The 2024 EPA Toxics Release Inventory indicates over 2,110,000 pounds of toxic chemical waste was generated at 18 regulated facilities in the City.<sup>12</sup> Although this is an improvement from 2023 (2,600,000 pounds), the legacy impacts from generated chemical waste are still felt by the community. Of the chemical waste emitted to the air (20,043 pounds), 13% of these emissions was tetrachloroethylene, a known carcinogenic chemical, released from a foundry only 1.5 miles north of the Target Area. Data from the American Lung Association *State of the Air 2025* report gives Manitowoc County an “F” for ozone pollution, putting residents with asthma (**10% of the county’s population**) at risk who are especially vulnerable to illness and death from exposure.<sup>13</sup> The rate of adult asthma is **10% greater** in Manitowoc County compared to the National average.<sup>13</sup> Ozone and particle air pollution undoubtedly have a disproportionate impact on sensitive populations living in the county, in which 20% of its residents are children, 23% are elderly, and 12% are people of color.<sup>13</sup>

**Birth defects.** Birth defect rates are not available for the Target Area. The *WDHS Manitowoc County Profile* indicates the congenital anomaly rate for the county is 1.0%, **twice the rate** suffered by children in the adjacent Brown County.<sup>14</sup>

**Overall Health and Cancer Rates.** Although data for the Target Area is not available, the *2022 Manitowoc County Community Health Assessment*<sup>15</sup> ranked Manitowoc County 54 out of 72 counties in Wisconsin for length and quality of life based on a variety of health factors, including; physical environment (including air and water quality); social and economic factors (including education, income, and poverty); clinical care (including access, quality, and rate of uninsurance); and health behaviors (including alcohol/tobacco use, obesity and food insecurity). Obesity remains a significant challenge in Manitowoc County and the Target Area, with 18% of the low-income preschool children<sup>1</sup> and 39% of the adult population considered obese.<sup>16</sup> The National Cancer Institute indicates the age-adjusted incidence rates for melanoma, leukemia, non-Hodgkin lymphoma, and ovarian, uterine, bladder, renal, thyroid, lung and prostate **cancers are all greater than State and National rates.**<sup>17</sup> These poor health outcomes could be associated with lack of health insurance, as the uninsured rate of the county (7%)<sup>15</sup> is greater than that of the state (5%).<sup>18</sup> Though precise causes of identified poor health outcomes are likely due to a multitude of factors, contaminants of concern identified at the Target Area brownfields are known to cause neurological damage and poor health outcomes summarized above.

**Lead Exposure.** A total of 24.1% of children (birth to age 6) tested for lead poisoning were poisoned in CT-4 between 2021 and 2024, which is 3- to 4-times greater than the rate in the county or state<sup>19</sup>. As noted previously, **99% of the housing in CT-4 was built before lead paint was banned** (a known constituent of concern at the Target Property). Additionally, 4,721 lead water supply laterals totaling over 13 miles in length have been identified in the City, with a high density located at residential properties in CT-4. Children (under 18) account for 20% of the City’s population and are at the greatest risk for developing cognitive disabilities due to lead exposure. The total rate of cognitive disability in CT-4 (7%) is 30% greater than the rate of the state (4.9%) and 23% percent greater than the US (5.4%).<sup>2</sup> Additionally, the percent of all disabled individuals with a cognitive disability in CT-4 (46%) is 18% greater than the rates of the state and the US (each 39%).<sup>1</sup> Although the cause 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.

**Reduction of Health Risk.** Cleanup and redevelopment of the Target Property will mitigate health impacts by decreasing contamination mass and source areas, improving surface water quality and quality of local fisheries, and increasing opportunities for healthy living, thereby improving access to healthy housing/food and alternative transportation options.

<sup>11</sup> [sciencedirect.com/science/article/abs/pii/S0380133094711631](https://www.sciencedirect.com/science/article/abs/pii/S0380133094711631)

<sup>12</sup> [epa.gov/toxics-release-inventory-tri-program](https://epa.gov/toxics-release-inventory-tri-program)

<sup>13</sup> [lung.org/research/sota/city-rankings/states/wisconsin/manitowoc](https://lung.org/research/sota/city-rankings/states/wisconsin/manitowoc) & [lung.org/research/trends-in-lung-disease/asthma-trends-brief/current-demographics](https://lung.org/research/trends-in-lung-disease/asthma-trends-brief/current-demographics)

<sup>14</sup> [dhs.wisconsin.gov/publications/p45358-21.pdf](https://dhs.wisconsin.gov/publications/p45358-21.pdf)

<sup>15</sup> [manitowocountywi.gov/wp-content/uploads/2023/01/2022\\_CHA-Report\\_MC.pdf](https://manitowocountywi.gov/wp-content/uploads/2023/01/2022_CHA-Report_MC.pdf)

<sup>16</sup> <https://www.cdc.gov/places/>

<sup>17</sup> <https://statecancerprofiles.cancer.gov/incidencerates/>

<sup>18</sup> <https://data.census.gov/profile/Wisconsin?g=040XX00US55#health>

<sup>19</sup> <https://www.dhs.wisconsin.gov/lead/data.htm>

(2.d) Economically Impoverished/Disproportionately Impacted Populations. 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 overwhelmingly burdened sensitive populations (e.g., women, children, and persons with disabilities) in the Target Area. Single mothers and children in poverty are especially threatened, as over 45% of single female-led families in the City live in poverty.<sup>1</sup> **Table 4** summarizes negative environmental impacts in the Target Area in a community disproportionately burdened with poor air quality (e.g., ozone and wildfire smoke), increased risk to children from lead exposure (e.g., housing built pre-1980), and abundant risks from exposure to residual soil and groundwater contamination (e.g., proximity to potentially hazardous and toxic sites).

**Housing and Environmental Burden.** Equitable housing is one of the greatest needs in Manitowoc, and the Target Area is impacted by a significant lack of healthy housing. Therefore, it is not surprising that the Agency for Toxic Substances and Disease Registry *Geospatial Research, Analysis & Services Program* (GRASP)<sup>20</sup> ranks in Target Area in the 99<sup>th</sup> percentile for housing built prior to 1980 when compared to other US communities, which is attributable to housing cost burden and older housing stock with a high lead paint risk compounded by low household income in the community. GRASP identifies the Target Area as having a **high overall environmental burden** rank (92<sup>nd</sup> percentile) in comparison to the rest of the US. Local industrial operators contribute to environmental burden in the community via ozone and other air pollutants (77<sup>th</sup> percentile), as well as pollution from transportation and travel via roads, railway, and airports (97<sup>th</sup> percentile). With the City’s extensive history of industrial operations, it is not surprising that GRASP identified CT-4 as being in the 91<sup>st</sup> percentile due to its proximity to potentially hazardous and toxic sites.

<b>Table 4. Indicators of Community Vulnerability</b> (% in US with lower risk vs. target neighborhood) <sup>19</sup>		CT-4
<b>GRASP Rankings of Environmental Burden</b>		
Ozone		<u>77</u>
Potentially Hazardous & Toxic Sites		<b>91</b>
Housing Built Pre-1980		<b>99</b>
Transportation Infrastructure		<b>97</b>
<b>Overall Environmental Burden</b>		<b>92</b>

Underlined indicates high rank of burden compared to the US; **BOLD & RED** indicates burden in CT-4 is **greater than 75%** of all census tracts in the US.

**Access and Food Security:** Obesity and food insecurity continue to be significant health issues in the Target Area. The density of fast-food restaurants in the City (by zip code 9.84 per 10,000 population<sup>1</sup>) is more than double the density in the rest of the state.<sup>21</sup> The *Wisconsin Food Security Project* estimates 8.1% of the population of Manitowoc County are in food-insecure households.<sup>22</sup> Even more worrisome, Manitowoc County’s *Community Health Assessment* indicated that **61% of middle and high school students self-reported experiencing hunger** due to a lack of food at home<sup>15</sup>. A local food pantry approximately 0.5 miles from the Target Property is seeing overwhelming demand, distributing 3,500 pounds of food per day<sup>23</sup>, which is not surprising given the low income of the community. In addition to increased instances of obesity in the Target Area, lack of regular access to affordable, healthy food can lead to increased incidences of heart disease, the leading cause of death in the county<sup>15</sup>; in 2023, heart disease was the cause of 275 deaths per 100,000 people in the county, which was **40% greater** than the state (194 per 100,000)<sup>1</sup>.

**Reduction of Economic Impoverishment.** Cleanup and redevelopment of the Target Property will provide economic aid to this disproportionately impacted community by making the Target Area more livable/walkable via increasing access/options to healthy housing, increasing food security, and improving air quality by decreasing traffic. Redevelopment specifically targets housing for workforce and LMI households (i.e. healthy housing at varying price points); therefore, displacement of the underserved community will not occur.

**2.e-g Community Need and Community Engagement – Community Engagement**

(2.e) Project Involvement and (2.f) Project Roles. The Manitowoc BAC was established over a decade ago to provide oversight for the City’s phenomenally successful Brownfields program and advocate for the needs of the community. BAC members reviewed/provided input on this application and will continue to bring community voices to the table during cleanup **and** future reuse. Partners listed on **Table 5** affirm their commitment to serve on the BAC.

<b>Table 5. Members of the Brownfields Advisory Committee</b>			
<b>Organization</b>	<b>Entity’s Mission</b>	<b>Contact</b>	<b>Partner Role / Specific Expertise on BAC</b>
Chamber of Manitowoc County	Member-driven org. that provides resources and services to promote business.	Abbey Quistorf abbey@chambermanitowoccounty.org	Facilitate redevelopment by identifying and finding resources to <b>encourage developers and small businesses to redevelop Target Area brownfields</b> per the City’s <i>Plans</i> .
Progress Lakeshore	Economic dev. corp. working to retain, grow, and attract businesses and entrepreneurs.	Jamie Zastrow jamie@progresslakeshore.org	

<sup>20</sup> [atsdr.cdc.gov/place-health/](https://atsdr.cdc.gov/place-health/)

<sup>21</sup> [247wallst.com/special-report/2022/11/27/states-with-the-most-and-fewest-fast-food-restaurants-per-capita/](https://247wallst.com/special-report/2022/11/27/states-with-the-most-and-fewest-fast-food-restaurants-per-capita/)

<sup>22</sup> [foodsecurity.wisc.edu/mapping](https://foodsecurity.wisc.edu/mapping)

<sup>23</sup> [peterspantry.org/](https://peterspantry.org/)

**Table 5. Members of the Brownfields Advisory Committee**

Organization	Entity's Mission	Contact	Partner Role / Specific Expertise on BAC
Associated Bank	Local lending institution providing financing for brownfield redevelopments.	Dennis Tienor dennis.tienor@associatedbank.com	Local lending institution providing insight on <b>financial guidance for proposed reuse strategy</b> and assist developers to secure funding.
Lakeshore College	Collaborative and inclusive education for <u>all members</u> of the college community.	Meredith Sauer meredith.sauer@lakeshore.edu	Provide quality education that is accessible to all members of the community and <b>link job openings &amp; training opportunities</b> to them.
Self-employed writer, consultant & community activist	Strategic and financial planning to support housing, food security & welfare non-profits.	Mike Huck [REDACTED]	Facilitate translation of project materials into Spanish and Hmong and <b>engage underserved community members</b> .
Friends of the Manitowoc River Watershed	Volunteer org. providing a unified voice to enhance the Manitowoc River and watershed.	Amy Lentz amy@lnrp.org	<b>Represent stakeholders who recreate in the Manitowoc River</b> , including underserved community members.
EPA and WDNR Project Managers	<b>To Be Determined</b> - Provide technical assistance and review of work products in Tasks 1-3 outlined in Section 3; (e.g., Quality Assurance Project Plan (QAPP), Remedial Action Plan/Materials Management Plan [RAP/MMP], Construction Documentation Report [CDR]).		
The Director of the Manitowoc County Health Department (Korina Aghmar; 920-683-4155) will attend BAC meetings and community outreach meetings to answer any health-related questions/concerns related to the cleanup.			

(2.g) 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 Property began decades ago and continued through development of the *Plans* described in Section 1.c. Within one month of award, the CDA (grantee) will develop a site-specific Community Involvement Plan (CIP) to leverage the expertise and networks of the BAC. The CIP will be designed specifically to engage and inform the underserved community members, provide an avenue for input/feedback, establish how input will be considered and responded to. The approved CIP will be implemented in Fall 2026, utilizing the BAC to engage the community and local businesses in the cleanup and overall redevelopment of the Target Property. The timeline for community meetings will be outlined in the CIP. The CDA will hold at least one meeting per quarter at key points during the project, including: (1) upon grant award to discuss project initiation, tasks, schedule, and expectations with the community; (2) upon posting of the final ABCA; (3) when cleanup activities begin; (4) periodically during active cleanup; and (5) a final meeting when cleanup is complete. In 2020, the BAC started using online meeting platforms (e.g., Zoom or Microsoft Teams) for outreach meetings. Virtual tools have worked extremely well in connecting citizens to City-led projects and will continue to be offered to engage the community during future brownfield redevelopments. The CIP will include a variety of additional online tools (e.g., social media, webpage/email updates), and the local newspaper will continue to be a significant source of information dissemination as the project progresses. The Downtown Farmers Market (less than a 10-minute walk for residents of the Target Area) will also feature Target Property renderings displayed on posters with QR codes to solicit immediate feedback from the community. As this 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 stakeholder work schedules. Meetings will be held at locations served by the mass transit system, within walking distance of the Target Area, and at ADA-compliant facilities to accommodate needs of sensitive populations (e.g., disabled, elderly).

### **3.a Task Descriptions, Cost Estimates, and Measuring Progress – Proposed Cleanup Plan**

Contaminated Media to be Addressed: Hazardous substances (e.g., VOCs, PAHs, cyanide, heavy metals, and PFAS) were detected in soil/fill and groundwater at the Target Property at concentrations significantly greater than applicable health-based direct contact soil quality standards, rendering the site unsuitable for multi-family residential, commercial, and public use if not remediated. Impacts appear to be associated with historic releases from former industrial operations and/or the historic placement of 28,000 cubic yards (yd<sup>3</sup>) of impacted granular fill on the Target Property. Institutional controls to maintain the engineered barriers and prevent contact with residual soil and groundwater contamination will be enacted by the City following completion of cleanup. This cleanup plan is consistent with the Reuse Plans.

Cleanup Plan: Upon award, the ABCA will be finalized, waste characterization sampling conducted to develop waste profiles for landfill approval, and a RAP/MMP will be prepared and submitted to WDNR/EPA for concurrence on the proposed cleanup at the Target Property. The RAP/MMP will describe cleanup methods to facilitate non-industrial reuse and will outline contingency plans for managing fluids (e.g. stormwater) and/or other materials encountered during construction. The selected remedial approach to be completed by appropriately licensed/certified remedial contractors, with work overseen by the Qualified Environmental Professional (QEP) firm and regulatory agencies (EPA and WDNR)

under this grant will include: (1) excavation, transportation, and offsite disposal of soil (estimated 9,800 yd<sup>3</sup>) with significant VOCs, PAHs, cyanide, and heavy metal impacts that is not suitable for beneficial reuse onsite; (2) Importing 13,000 yd<sup>3</sup> of clean soil finished with topsoil, turf and native vegetation & constructing hardscape engineered barriers (1,203 yd<sup>3</sup> of aggregate and 4,853 square yards [yd<sup>2</sup>] of concrete/asphalt) to cap the site and mitigate the potential for direct contact with residual soil impacts and reduce the risk for mobilization of impacts to groundwater and/or to the river through stormwater runoff; and (3) preparation of a CDR, implementing a post-construction environmental monitoring program, and establishing institutional controls for long-term management of residual contamination.

Disposal Requirements: Removed soil can be managed as a solid waste and transported/disposed of at a local licensed solid waste landfill. The scope and budget assume the majority of removed soil can be used by the landfill for beneficial reuse within the landfill footprint. Dewatering is not anticipated.

### 3.b-e Task Descriptions, Cost Estimates, and Measuring Progress – Description of Tasks/Activities and Outputs

(3.b) Project Implementation, (3.c) Anticipated Project Schedule, (3.d) Task/Activity Lead, and (3.e) Outputs. The CDA has developed the appropriate tools and procedures to immediately begin implementation of the grant. The CDA retained a remedial contractor and a QEP to implement this cleanup grant per the requirements of 2 CFR 200.317-200.326 and 2 CFR 1500. This shovel-ready project will be completed in 36 months (estimated Q1 FY30), as described below.

<b>Task 1 - Activity: Program Management</b>
<b>3.b Project Implementation:</b> Manage contracts for QEP & Remedial Contractor, prepare quarterly progress reports & annual financial reports; update the Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; prepare grant closeout report.
<b>3.c Anticipated Project Schedule:</b> Quarterly progress reports will be submitted by Jan. 30th, Apr. 30th, Jul. 30th, & Oct. 30th of each year, with the first due on Jan. 30, 2027. ACRES database to be maintained over full duration of project. Annual financial reports will be submitted by Oct. 30 <sup>th</sup> of each year, with the first due on Oct. 30, 2027. Grant closeout expected Q1 FY30.
<b>3.d Task/Activity Leads:</b> CDA Project Manager (PM) & CDA Project Coordinator (with input from QEP).
<b>3.e Outputs:</b> Administrative records; (12) quarterly progress reports & ACRES updates; (3) annual financial reports; (1) grant closeout report. (# of outputs assumes schedule holds).
<b>Task 2 - Activity: Cleanup Oversight</b>
<b>3.b Project Implementation:</b> Finalize ABCA; adapt QAPP; complete waste characterization sampling to develop waste disposal profiles; prepare RAP/MMP; develop/implement post-construction environmental monitoring program; oversee cleanup activities & Davis-Bacon Act (DBA) compliance; prepare CDR & establish institutional controls.
<b>3.c Anticipated Project Schedule:</b> Finalize ABCA, adapt current QAPP & complete waste characterization sampling (Q1 FY27); develop waste profiles & RAP/MMP for WDNR & landfill approvals (Q1 FY27); oversee cleanup once approved (Q3 FY27); complete DBA compliance records concurrent with Task 3; prepare CDR & institutional controls (Q1 FY28 - Q2 FY28); implement post-construction environmental monitoring (Q1 FY28 - Q4 FY29).
<b>3.d Task/Activity Leads:</b> CDA PM & QEP, with input from WDNR & EPA PMs.
<b>3.e Outputs:</b> Finalized ABCA; QAPP update; waste profiles; RAP/MMP; DBA compliance documentation; CDR; institutional controls; post-construction environmental monitoring plan.
<b>Task 3 - Activity: Cleanup (Remedial Contractor Only)</b>
<b>3.b Project Implementation:</b> Implement cleanup plan once approved, as described in Section 3.a.
<b>3.c Anticipated Project Schedule:</b> Q3 FY27 - Q4 FY27 (180 days).
<b>3.d Task/Activity Leads:</b> CDA PM, Remedial Contractor(s) PM(s) & QEP.
<b>3.e Outputs:</b> Daily construction logs; landfill tickets.
<b>Task 4 - Activity: Community Outreach</b>
<b>3.b Project Implementation:</b> Prepare and implement a Site-Specific CIP; host quarterly public meetings to discuss Target Property cleanup & redevelopment plans; community events; attend National Brownfield Conference.
<b>3.c Anticipated Project Schedule:</b> Site-Specific CIP & first public meeting Q1FY27, with public meetings held quarterly for the duration of the project; National Brownfield Conference in Q3FY27.
<b>3.d Task/Activity Leads:</b> CDA PM & BAC, with input from QEP.
<b>3.e Outputs:</b> Site-Specific CIP; meeting deliverables; reuse plans; presentation materials.

**3.f Task Descriptions, Cost Estimates, and Measuring Progress – Cost Estimates.** The City of Manitowoc Department of Community Development serves as the fiduciary and managing agent of the CDA (the grant applicant). Personnel (\$38/hr) and fringe (\$12/hr) are an average of City staff rates. Construction and Contractual costs are based on the contracts executed with the remedial contractor and the QEP, which were previously retained per the requirements of 2 CFR 200.317-200.326 and 2 CFR 1500; these costs are reflected in the following budget.

Budget Categories		Task 1	Task 2	Task 3	Task 4	Admin. Costs	Total
		Program Management	Cleanup Oversight	Cleanup	Community Outreach		
Direct Costs	Personnel	\$11,856	\$2,280		\$6,840		\$20,976
	Fringe Benefits	\$3,744	\$720		\$2,160		\$6,624
	Supplies				\$2,450		\$2,450
	Travel				\$2,400		\$2,400
	Contractual	\$9,000	\$581,025		\$5,500		\$595,525
	Construction			\$3,222,589			\$3,222,589
	Other (WDNR Fees, Conference Registration Fees)		\$6,325		\$700		\$7,025
<b>TOTAL BUDGET</b>		<b>\$24,600</b>	<b>\$590,350</b>	<b>\$3,222,589</b>	<b>\$20,050</b>	<b>\$0</b>	<b>\$3,857,589</b>

#### Task 1 – Program Management: Total Budget = \$24,600

**Cost Basis and Assumptions:** Personnel/Fringe Costs of **\$15,600** are budgeted for an estimated 312hr (@ \$50/hr) of work by the CDA PM & staff to manage the cooperative agreement as follows: manage QEP & remedial contractor (4hr/month\*36 months=144hr); prepare quarterly reports & maintain ACRES database (10hr/quarter\*12 quarters =120hr); annual financial reporting (10hr/year\*3 years=30hr); grant closeout report (18hr). Contractual Costs of **\$9,000** are budgeted for an estimated 72hr (@ \$125/hr) of work by QEP to assist completing various required reports.

#### Task 2 – Cleanup Oversight: Total Budget = \$590,350

**Cost Basis and Assumptions:** Personnel/Fringe Costs of **\$3,000** are budgeted for an estimated 60hr (@ \$50/hr) of work by the CDA PM & staff for review of project deliverables (20hr); and coordination during onsite field work (40hr). Contractual Costs of **\$581,025** are budgeted for the following work to be performed by the QEP: complete pre-design waste characterization sampling (\$10,000, includes driller & lab costs); finalize the ABCA, adapt existing QAPP for project use, develop landfill waste profiles & prepare a RAP/MMP (140hr @ \$150/hr); direct contractor oversight (40hr/week for 25 weeks @ \$150/hr); and engineering design & support leading up to/during construction (20hr/week for 50 weeks @ \$150/hr); prepare a CDR, DBA documentation & establish institutional controls (280hr @ \$150/hr); implement post-construction environmental monitoring plan, including installation and sampling of a network of 15 monitoring wells for 8 quarters (\$208,025, includes driller, lab, investigative waste disposal & reporting costs). Other “WDNR fees” for regulatory oversight & review of project deliverables is **\$6,325**.

#### Task 3 – Cleanup: Total Budget = \$3,222,589

**Cost Basis and Assumptions:** Construction Costs of **\$3,222,589** are budgeted for construction staking, installation of stormwater BMPs, traffic control & site clearing/grubbing (\$271,565); excavation & offsite disposal of impacted soils to a licensed solid waste landfill (9,800 yd<sup>3</sup> @ \$120/yd<sup>3</sup>); import/place clay & topsoil (13,000 yd<sup>3</sup> @ average \$38/yd<sup>3</sup>) to construct an engineered barrier, finished in turf & native vegetation (4,542 yd<sup>2</sup> @ average \$52/yd<sup>2</sup>); construct hardscape (trails, rights-of-way) engineered barrier comprised of concrete & aggregate (52,242 ft<sup>2</sup> @ average \$20/ft<sup>2</sup>).

#### Task 4 – Community Outreach: Total Budget = \$20,050

**Cost Basis and Assumptions:** Personnel/Fringe Costs of **\$9,000** are budgeted for 180hr (@ \$50/hr) of work by CDA PM & staff for planning/hosting (15) outreach activities (12hr/quarter @ \$50/hr). Supply Costs of **\$2,450** are budgeted for printing costs (\$1,500) & mailing costs for public notices (\$950). Travel Costs of **\$2,400** are for (2) City staff to attend a 3-day National Brownfield Conference (\$1,560 for meals & lodging @ \$260/person/night; \$700 for travel @ \$350/person; and \$140 for ground transportation @ \$70/person). Contractual Costs of **\$5,500** are budgeted for 44hr of work by QEP (@ \$125/hr) to prepare a site-specific CIP & assist with outreach activities. Other “Conference Fees” of \$700 are budgeted for (2) City staff registration for the National Brownfield Conference (@ \$350/person).

**3.g. Task Descriptions, Cost Estimates, and Measuring Progress – Plan to Measure and Evaluate Environmental Progress and Results.** Project results/outputs and outcomes will be tracked, and progress measured/evaluated **weekly** using existing tools developed by the CDA 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 using Microsoft Project to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of the community. Project **outcomes** and accomplishments, including project milestones/deliverables, and leveraged resources will further be tracked on a monthly/quarterly in ACRES. For measuring and evaluating progress, outputs and outcomes will be compared to the proposed project schedule; if a deviation of more than one fiscal quarter is reached, interventions (ex. increased team meetings) will be implemented to maintain the project schedule and the CDA and QEP will work with WDNR/EPA to adjust the approach to maintain progress on achieving project outputs/outcomes. Project outcomes will be tracked and quantified in the final progress report by comparing future community welfare characteristics to current conditions and will include: (1) increase in shovel-ready portions of the Target Property suitable for residential redevelopment; (2) increased greenspace and multi modal trail acreage; and (3) leveraged investment in the Target

Property. These outcomes advance the City’s Brownfield objectives by (1) increasing developer interest in the Target Area; and (2) increasing property values in the vicinity of the Target Property. Project outcomes will be tracked long-term on a five-year basis by the CDA and reported in future brownfield conferences, fact sheets and/or the City website.

#### **4.a-c Programmatic Capability and Past Performance – Programmatic Capability**

(4.a) Organizational Structure and (4.b) Description of Key Staff. By State statute and local ordinance, the City of Manitowoc Department of Community Development serves as the fiduciary and managing agent of the CDA, the grant applicant. This grant will be managed by the same high-performing team of City community development specialists, planners, administrators, and financial professionals that have experience with the successful implementation of a wide variety of local, state and federal grants. **The CDA has managed 10 EPA Brownfield Grants since 2013**, which include Cleanup (FY22, FY23, FY24), Assessment (FY13, FY15, FY18 (x2), FY21, FY25; includes Site-Specific and Community-Wide), and RLF (FY13) grants. **Mr. Adam Tegen**, Executive Director of the CDA, will serve as the Brownfield Project Manager for this project and will be responsible for project performance and coordination with EPA and WDNR. Mr. Tegen has served in planning, zoning, and economic development for over 20 years and is a leader for the City’s brownfield and economic development efforts. Mr. Tegen has served as the acting project manager for several previously funded EPA grants, and has acted as administrator for the rest. **Mr. Paul Braun**, City Planner, will serve as the Brownfield Project Coordinator and administrative contact for this project, and will be responsible for coordinating project work with the QEP and other project team members. Mr. Braun has over 30 years of experience in community planning and development and will be involved in daily grant operations. Though his role in this FY26 Cleanup grant is as project coordinator, Mr. Braun has also been the dedicated project manager for several previously funded EPA grants. With his familiarity with grant operations, Mr. Braun can immediately step in as interim/replacement project manager in the case of loss/reassignment of the active Project Manager. **Mr. Shawn Alfred**, Finance Director, will provide financial tracking and documentation to ensure grant requirements are met and project funds are expended in a timely and successful manner. The project team will capitalize on the expertise of additional City staff, including a GIS specialist, planners, and administrative support staff. The CDA will additionally utilize the expertise of the **BAC, QEP, City, WEDC, WDNR, and EPA** to provide project support and guidance. Together, this project team has the qualifications, depth, and experience to successfully administer the technical, administrative and financial requirements of this grant.

(4.c) Acquiring Additional Resources. The CDA retained a remedial contractor and a QEP to implement this grant per the requirements of 2 CFR 200.317-200.326 and 2 CFR 1500. Should additional project expertise/resources be required, additional contractor(s) will be retained using the same procurement methods via the City’s program that promotes local hiring and links community members to brownfield redevelopment work as part of ongoing *Six Good Faith Efforts*.

#### **4.d. Past Performance and Accomplishments – Currently Has or Previously Received an EPA Brownfields Grant**

(4.d.1) Accomplishments: The CDA has successfully managed the following **recent** EPA grants summarized below:

**4B-00E03573-0 EPA Brownfield Cleanup Grant for Hazardous Substances (FY23; \$500K):** The CDA utilized this grant to clean up the 6.1-acre “Phase 2 Redevelopment Area” of the River Point District (within the Target Area and adjacent to the Target Property). Work began in Q4 FY23 and included the removal of 976 tons of contaminated soil and import of 20,000 yd<sup>3</sup> of clean fill. New construction of “River Point Drive” created a key artery linking the River Point District to the City’s downtown and leveraged over \$1MM in public funds for subsequent utility installation in the rights-of-way. The site was finished/capped with 1.8 acres of greenspace and 1,400 feet of paved rights-of-way, with 2 acres prepared for future residential and 5,000 ft<sup>2</sup> for future commercial redevelopment. The grant was closed by Q2 FY24.

**4B-00E03876-0 EPA Brownfield Cleanup Grant for Hazardous Substances (FY24; \$2M):** In Q1 FY25 the CDA started cleanup work at the “Mirro” site, a prominent former aluminum plant that left an entire City block in downtown Manitowoc vacant and blighted since its closure in 1986. Cleanup included the removal/disposal of 1,430 tons of highly contaminated concrete/soil at a licensed hazardous waste landfill, as well as 420 tons of soil in a licensed solid waste landfill. Following import of clean fill, an initial 2.3-acre cap/engineered barrier was constructed across the remediation area in Q4 FY25, with final cap construction scheduled for Q2 FY26 to prepare the site for a 59-unit affordable housing development. The developer successfully secured \$1.5MM in federal and state housing tax credits, and the housing units are expected to have full occupancy by Q4 FY28. Achievements continue to be reflected in ACRES.

(4.d.2) Compliance with Grant Requirements: The CDA has a strong record of compliance with EPA Brownfields grant workplans, schedules and terms and conditions. All annual financial reports, quarterly reports, project deliverables and ACRES entries for EPA Brownfields grants awarded to the City have been submitted accurately and on time. The CDA has consistently achieved timely and eligible grant activities, outcomes, and deliverables, and no corrective actions have been required. The FY23 EPA Cleanup grant was closed out ahead of schedule with no funds remaining. The closeout report for the FY24 EPA Cleanup grant will be submitted ahead of schedule once remaining committed funds are expended for outstanding eligible activities (e.g., final cap construction in Q2 FY26); no funds will remain when the final report is submitted.

**Attachment B**  
**Threshold Criteria Responses**

## ATTACHMENT B: THRESHOLD CRITERIA RESPONSES

**Name of Applicant:** Community Development Authority of the City of Manitowoc, Wisconsin

### 1. Applicant Eligibility

The Community Development Authority (CDA) of the City of Manitowoc, Wisconsin (the grant applicant and current property owner) is a quasi-governmental entity functioning within the City to support blight elimination, slum clearance, urban renewal, and redevelopment in the City of Manitowoc. The CDA has the powers, duties and functions set out in Section 66.1335 of the Wisconsin Statute for housing and redevelopment authorities.

The CDA consists of seven volunteer resident/citizen Commissioners appointed by the Mayor with confirmation from the Manitowoc Common Council. The CDA annually elects a chairperson and vice-chairperson, and as noted in **Attachment B1**, by State statute and Manitowoc Municipal code the CDA is:

*deemed a separate body corporate and politic [from the City of Manitowoc] for the purpose of carrying out blight elimination, slum clearance, urban renewal programs and projects and housing projects.*

**The CDA is not directly supervised nor controlled by the Mayor and is not primarily staffed by employees of the City of Manitowoc.**

As such, the CDA is considered eligible to apply for a FY26 Cleanup grant in addition to the FY26 brownfield cleanup grant submitted by the City of Manitowoc.

### 2. Previously Awarded Cleanup Grants

The proposed site (River Point District Phase 4 Redevelopment Area) has not received funding from a previously awarded USEPA brownfields cleanup grant.

### 3. Expenditure of Existing Multipurpose Grant Funds

The grant applicant does not have an open USEPA Brownfields Multipurpose Grant; therefore, this threshold criteria does not apply.

### 4. Site Ownership

For the purpose of blight elimination and slum clearance, the Community Development Authority of the City of Manitowoc acquired the subject Brownfield site on April 12, 2019. If awarded, the CDA will retain ownership of the Site for the duration of the time in which Brownfield cleanup grant funds are disbursed.

## 5. Basic Site Information

Name of the Site: Phase 4 Redevelopment Area of the River Point District

Address of the Site: 1110 Chicago Street; Manitowoc, WI 54220

## 6. Status and History of Contamination at the Site

(a) Site Contamination: The target Brownfield site is contaminated with hazardous substances related to previous railroad, bulk petroleum, and manufacturing use of the Site.

(b) Operational History and Current Use of the Site:

### **Operational History**

As described in the Stantec (2019) Phase I ESA, the Site appears undeveloped in 1835; however, the proximity of the peninsula to the Lake Michigan/Great Lakes shipping route facilitated initial large scale industrial transloading development of the River Point District by 1868 with expanded industrial, commercial, and residential development between 1868 and 1883. Although ownership records are not available, a panoramic map drawn in 1883 indicates the River Point District was fully developed and occupied by several large industrial-like buildings and smaller commercial-like buildings. In addition to railroad infrastructure, historic uses of the River Point District by previous owners/tenants have included ship building, lumberyards, warehouses, blacksmiths, a smoke house, carpet weaving, an iron/metal scrap yard, a grain elevator, parking, multiple bulk petroleum storage/distribution yards, and transloading yards for stone or coal. Historic uses of PINS associated with the Phase 4 Redevelopment Area are summarized below:

### Past Tenants and Site Uses – PIN 173001 and 173010

The Site was developed as the “Jones Saw Mill” between 1835 and 1868, which was renamed the “Hansen and Scove Saw Mill” by 1883. The Site was platted as individual parcels by 1878, presumably for residential/commercial use as an extension of the downtown street grid and historic maps confirm at least three buildings were present at the Site by 1894.

The Site was redeveloped as a coal transloading yard in the late 19th Century concurrent with the redevelopment of the River Point District for railroad use in the late 19th Century. Sanborn ® Fire Insurance Maps indicate the coal storage/transloading facility operated as the “Wisconsin Central RR Coal Dock” by the “C. Reiss Coal Co.” through at least 1945. The “Goodrich Transit Co.” used the bulkhead line of the Manitowoc River in 1919 for winter storage of three steam ships (S.S. Christopher Columbus, S.S. Florida, and the S.S. Arizona).

Historic orthophotographs indicate the western half of the Site was redeveloped for use as automotive parking by 1946. Although records are sparse, the parking area appears to have been leased to the “Manitowoc Ship Building Company.” Historic orthophotographs suggest the western portion of the Site was used for automotive parking through at least 1976.

Assessor records indicate bulk of the Site was leased to the “Laird Lumber Company” in December 1950, who subsequently constructed the four remaining buildings/sheds onsite through 2024 plus two sheds that were razed by 1988. Assessor records indicate the lease was transferred to the “Braun Building Company” by 1969, who operated a millwork truss assembly facility onsite from 1969 through 2024.

#### Past Tenants and Site Uses – PIN 173002

Approximately 0.01 acres on the far southeastern corner of the Site was leased to the “Wisconsin Fuel and Light Company” in 1986, which was later renamed “Wisconsin Public Service Commission”. No buildings or industrial uses were apparent on this portion of the Site by the Wisconsin Fuel and Light Company (or their subsequent entities).

#### Past Tenants and Site Uses – PIN 173000 and 173170

The Site includes small portions of two larger PINs (173000 and 173170), which appear to have served as rights of way to deliver bulk petroleum to the storage facilities located adjacent to and immediately south of the Site. These portions of the Site remained in railroad use through most of the 20th Century.

#### **Current Use of the Site**

The CDA acquired the Site on April 12, 2019, for the purpose of blight elimination and subsequently received a Local Government Unit (LGU) Environmental Liability Exemption from the Wisconsin Department of Natural Resources (WDNR) on March 18, 2019, with a Bureau for Remediation and Redevelopment Tracking System (BRRTS) activity number of 07-36-583000.

Following acquisition, the CDA maintained the lease to the Braun Building Company through 2024 for the operation of a wooden truss assembly facility and structural lumber storage. One building was additionally subleased by Braun Building Company to McMullen and Pitz through 2024 for use as boat and equipment storage. Operations by the Braun Building Company following CDA acquisition did not include the storage/use of hazardous substances. All Site building leases were terminated by the CDA at the end of 2024, and all Site buildings have been razed as of February 2025.

Remediation of the Phase 4 Redevelopment Area will facilitate a shovel-ready multi-family housing project.

(c) Environmental Concerns: Multiple phases of due diligence have occurred at the Site. A Phase I ESA was completed on behalf of the current owner/grant applicant (the Community Development Authority of the City of Manitowoc) on March 21, 2019 by Stantec (2019) utilizing USEPA Brownfield Assessment grant funding provided to the City of Manitowoc. The Phase I ESA identified the following recognized environmental conditions (RECs):

- REC 1: Prior Railroad Use
- REC 2: Prior Industrial Use
- REC 3: Residual Impacts to Soil and Groundwater
- REC 4: Apparent Anthropogenic Fill

- REC 5: Storage/Dumping by Adjacent Property Owners
- REC 6: Residual Impacts to Soil and Groundwater from Nearby Properties

Environmental assessment activities have continued at the Site as part of continuing obligations and included investigations documented in the following capstone outputs:

- Stantec, 2020, Phase II Environmental Site Assessment, Riverpoint District; Manitowoc, Wisconsin, March 23, 2020.
- Stantec, 2023a, Site Investigation Workplan; Phase 3 Construction Area of the River Point District; Manitowoc, Wisconsin, April 7, 2023.
- Stantec, 2023b, Site Investigation Report, River Point District Phase 2 Redevelopment Area; Manitowoc, Wisconsin, June 2, 2023.
- Stantec, 2023c, PFAS Concentrations in Soil at the River Point District (BRRTS Case No. 07-36-583000), email correspondence from Harris Byers (Stantec) to WDNR, July 28, 2023.
- Stantec, 2024a, Interim Construction Documentation Report – River Point Drive Rights of Way and Adjacent Future Multi-Family Residential and Commercial Parcels, Phase II Redevelopment Area, River Point District; Manitowoc, Wisconsin, January 19, 2024.
- Stantec, 2024b, Pre-Demolition Asbestos-Containing Materials, Lead-Bearing Paint, and Hazardous/Restricted Waste Surveys, (4) Buildings in the Phase III Redevelopment Area of the River Point District, 1103 Chicago Street, Manitowoc, Wisconsin, January 29, 2024.
- Stantec, 2024c, Summary of Building Demolition Activities, Phase 3 Redevelopment Area of the River Point District, Manitowoc, Wisconsin, May 1, 2024.
- Stantec, 2024d, Site Investigation Report, River Point District, Phase 3 Redevelopment Area; Manitowoc, Wisconsin, October 8, 2024.
- Stantec, 2024e, Analysis of Brownfield Cleanup Alternatives, Phase 3 Redevelopment Area, October 24, 2024.
- Stantec, 2025, Draft Analysis of Brownfield Cleanup Alternatives and ch. NR 722 Remedial Action Options Report, Phase 4 Redevelopment Area, December 16, 2025.

As documented in previous Stantec reports (2020, 2023a-2023c, 2024a-2024e, 2025), residual soil and groundwater impacts associated with prior industrial use and placement of historic fill are present and will complicate redevelopment, as summarized below.

Soil. As summarized in work completed to date, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs)/ polycyclic aromatic hydrocarbons (PAHs), cyanide, and heavy metals were detected in soil at concentrations greater than applicable health-based ch. NR 720 WAC (NR 720) Residual Contaminant Levels (RCLs) and/or Background Threshold Values (BTVs) in the Phase 4 Redevelopment Area. Assessment work has further identified and delineated multiple fill units, including a sitewide metals-rich heterogeneous granular black anthropogenic fill unit of varying quality.

Groundwater. The potentiometric surface of shallow groundwater decreases towards the Manitowoc River, which serves as a constant head boundary for groundwater. Select VOCs, cyanide, SVOCs, and per- and polyfluorinated alkyl substances (PFAS) detected in

groundwater in the Phase 4 Redevelopment Area at concentrations greater than applicable health-based ch. NR 140 WAC (NR 140) groundwater quality standards.

Vapor. The Site is currently vacant. Therefore, the vapor intrusion pathway cannot be quantitatively evaluated at this point. However, soil and/or groundwater with residual VOC impacts may extend beneath areas of proposed multi-family residential buildings in the Phase 4 Redevelopment Area. As such, VOC impacts could pose a threat to indoor air quality due to vapor intrusion. As a conservative measure, future buildings that will be constructed may include a sub-slab depressurization system that can be made active if post-construction sub-slab vapor sampling indicates the risk for vapor intrusion.

As discussed in the Stantec (2025) draft Analysis of Brownfields Cleanup Alternatives (ABCA), remedial action activities to be funded in this grant are warranted to facilitate redevelopment at the Site and include:

- Excavation, transportation, and offsite disposal of heavy metal, VOC, PAH and/or cyanide-impacted fill disturbed during development;
- Construction of engineered barriers in the rights of way (ROWs) consisting of hardscape surfaces (i.e., concrete, asphalt), and/or landscaped areas to mitigate the potential for direct contact with residual soil impacts and reduce the risk for mobilization of soil impacts to groundwater;
- Construction of an engineered soil barrier along the Manitowoc River to mitigate the risk for direct contact with impacted soil/fill, reduce the risk of mobilization of soil/fill impacts to the river through stormwater runoff, and reduce the potential for leaching of residual impacts to groundwater; and
- Establishing institutional controls/continuing obligations and maintenance plans to provide for long-term control of residual soil and groundwater impacts in proposed ROWs.

The target Site is ideal to combat housing insecurity in Manitowoc. The extraordinary subsurface contamination summarized above is prompting the current owner to apply for this cleanup grant.

(d) How the Site Became Contaminated and Nature/Extents of Contamination: The Stantec (2019) Phase I ESA identified six RECs. Any of these RECs could be a source of contamination. The proposed cleanup project will focus on addressing comingled residual impacts associated with multiple industrial uses of the Site dating back to the late 19th Century described previously. Therefore, it is not possible to determine specific sources of impacts in the Phase 4 Redevelopment Area.

## 7. Brownfield Site Definition

Site is real property, the expansion, redevelopment, or reuse of which is being complicated by the presence or potential presence of hazardous constituents associated with previous Site operations. Per CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and Appendix 1, the property targeted for this site-specific assessment is (a) **not** listed or proposed for listing on the National Priorities List; (b) **not**

subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) **not** subject to the jurisdiction, custody, or control of the U.S. government.

## **8. Environmental Assessment Required for Cleanup Grant Applications**

Following acquisition, the CDA continued environmental assessment activities as documented in the reports outlined in Section 6(e). The Stantec (2020) Phase II ESA was completed per ASTM E1903-19 with subsequent Site Investigations [i.e., Stantec 2023 through 2024d] conducted under state cleanup program oversight.

## **9. Site Characterization**

A letter from the Wisconsin Department of Natural Resources is provided in **Attachment B2**.

## **10. Enforcement or Other Actions**

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

## **11. Sites Requiring a Property-Specific Determination**

The Community Development Authority of the City of Manitowoc submitted a property-specific eligibility determination to USEPA on June 11, 2018 to facilitate completion of due diligence prior to the Community Development Authority of the City of Manitowoc acquiring the property for the purpose of blight elimination. The eligibility determination was approved by the USEPA program manager (Mr. Christopher Choi; USEPA Region 5) on June 28, 2018.

As USEPA has already approved a property-specific determination for the target Brownfield property, submittal of an additional property-specific determination associated with this grant application does not appear warranted. The following provides a summary of information provided previously in the Stantec (2018) eligibility determination supplemented with details of work recently completed at the Site.

(a) CERCLA Planned or Ongoing Removal Action: None currently under oversight by USEPA.

(b-i) Unilateral Administrative Order: No orders are known.

(b-ii) Court Order: No orders are known.

(b-iii) Administrative Order on Consent: No orders are known to exist.

(b-iv) Judicial Consent Decree: No orders are known.

(b-v) Permit issued under RCRA, FWPCA, TSCA, and SWDA: No permits or corrective actions are known.

(c) RCRA-Permitted facility on the Site subject to corrective action: No facilities are known.

(d) Properties that are land disposal units that have submitted a RCRA closure notification: No closure notifications are known.

(e) PCB Release Subject to Remediation Under TSCA: None known.

(f) Assistance for Response Activity at the Site has Been Obtained for A Portion of the Site under Subtitle I of the SWDA from the LUST Trust Fund Established under Section 9508 if the IRS Code 1986: No portions are known.

(g) Assistance for Response Activity at the Site has Been Obtained for A Portion of the Site under Subtitle I of the SWDA from the LUST Trust Fund Established under Section 9508 if the IRS Code 1986: No portions are known.

## **12. (a) Threshold Criteria Related to CERCLA**

iii. Landowner protections from CERCLA Liability. A Phase I ESA was completed by Stantec (2019) per the All Appropriate Inquiries rule detailed in 40 CFR §312.21 utilizing ASTM E1527-13 on behalf of the current owner (The Community Development Authority of the City of Manitowoc) on March 21, 2019. The current owner acquired the Site on April 12, 2019 for the purpose of blight elimination and secured a liability exemption for local governmental units (LGUs) from WDNR per ch. 292.11(9) of the Wisconsin Administrative Code. Since taking ownership, the CDA has maintained compliance with the required continuing obligations and no records have been identified indicating the Community Development Authority of the City of Manitowoc is considered potentially liable or known to be affiliated with any other person that is potentially liable for contamination at the Site.

### **(1) Bona Fide Prospective Purchaser Liability Protection**

#### **a. Information on Property Acquisition**

- i. The Community Development Authority of the City of Manitowoc acquired the property through a negotiated purchase with the previous owner (Wisconsin Central Ltd) on April 12, 2019 for the purpose of blight elimination.
- ii. The CDA acquired the property on April 12, 2019.
- iii. The nature of ownership is fee simple.
- iv. The CDA acquired the property from Wisconsin Central, Ltd.
- v. No records have been identified indicating the Community Development Authority of the City of Manitowoc was affiliated or related to prior owners or operators through familial, contractual, corporate, or financial relationships.

- b. Pre-Purchase Inquiry
  - i. A *Phase I ESA* was completed by Stantec (2019) per the All Appropriate Inquiries rule detailed in 40 CFR §312.21 utilizing ASTM E1527-13 on behalf of the current owner (The Community Development Authority of the City of Manitowoc) on March 21, 2019. The current owner acquired the property on April 12, 2019 for the purpose of blight elimination and secured a liability exemption for local governmental units (LGUs) from WDNR per ch. 292.11(9) of the Wisconsin Administrative Code. A Phase II ESA was completed pre- and post-acquisition (Stantec, 2020) and assessment work has continued through 2024 (see response to Item 8, previously)
  - ii. The Stantec (2019) Phase I ESA was completed by registered Professional Engineers, Professional Geologists, and environmental professionals (collectively ‘qualified environmental professionals’) as those terms are defined and required per § 312.10 of 40 CFR 312.
  - iii. The Phase I ESA was completed on March 21, 2019 and ownership transfer occurred on April 12, 2019. Therefore, the Stantec (2019) Phase I ESA is considered valid for the purpose of establishing CERCLA liability defense.
- c. Timing and/or Contribution Toward Hazardous Substances Disposal. Timing and/or Contribution Toward Hazardous Substances Disposal. Disposal of all hazardous substances at the site occurred before the property was acquired by the Community Development Authority of the City of Manitowoc. The current owner has not caused or contributed to any release of hazardous substances at the site. Further, the current owner has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- d. Post-Acquisition Uses. Following acquisition, the CDA maintained the lease to the Braun Building Company through 2024 for the operation of a wooden truss assembly facility and structural lumber storage. One building was additionally subleased by Braun Building Company to McMullen and Pitz through 2024 for use as boat and equipment storage. However, operations by the Braun Building Company and/or McMullen and Pitz following CDA acquisition did not include the storage/use of hazardous substances or petroleum. All Site building leases were terminated by the CDA at the end of 2024, and all Site buildings have been razed as of February 2025.
- e. Continuing Obligations. The following provides a summary activities conducted after acquisition related to continuing obligations.
  - i. Stop continuing releases. As summarized in the Stantec (2020) Phase II ESA, a geophysical survey was conducted at the Site prior to the subsurface investigation. No anomalies consistent with underground storage tanks were identified and no aboveground storage tanks are apparent. Therefore, all potential sources of releases appear to have been removed prior to acquisition of the Site by the grant applicant. As such, no sources of ongoing

releases are known to remain on the Site. Therefore, the CDA has taken all reasonable steps to identify and stop continuing releases.

- ii. Prevent threatened future release. As noted above, all potential sources of releases appear to have been removed prior to acquisition of the Site by the grant applicant. In addition, operations by the Braun Building Company and/or McMullen and Pitz following CDA acquisition did not include the storage/use of hazardous substances or petroleum. As such, no sources of threatened future release are known to exist on the Site. The Site is secured and City police and building inspection staff drive by the Site during regular patrols to prevent illicit dumping. All Site building leases were terminated by the CDA at the end of 2024, and all Site buildings have been razed as of February 2025. Therefore, the CDA has taken all reasonable steps to identify and prevent a threatened future release.
- iii. Prevent or limit exposure to previously released hazardous substances. The CDA is maintaining compliance with existing activity use limitations and institutional controls. The Site is secured and City police and building inspection staff drive by the Site during regular patrols to prevent illicit dumping. Therefore, the CDA has taken all reasonable steps to limit exposure to previously released hazardous substances.

The Community Development Authority of the City of Manitowoc will continue to (i) comply with all land-use restrictions and institutional controls; (ii) assist and cooperate with those performing the assessment and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) provide all legally required notices.

### 13. Cleanup Authority and Oversight Structure

- a. The Phase 4 Redevelopment Area is enrolled in the WDNR Environmental Repair Program (ERP) and is being tracked in BRRTS under activity number 02-36-585491 (**Attachment B2**). All subsurface environmental assessment work completed at the Site to date has been reviewed by the WDNR project manager. WDNR will provide oversight of the cleanup proposed under this grant to ensure that the project protects human health and the environment.

If the grant is funded, the CDA will retain the services of an environmental consulting firm (QEP) per the requirements of 2 CFR 200.317 through 200.327 to ensure the technical expertise is in place prior to beginning cleanup activities.

As described in the response to (15), Stantec Consulting Services, Inc. was retained in compliance with 2 CFR Part 200 and 2 CFR Part 1500 to serve as the QEP consulting firm to assist with implementation of this cleanup grant, if awarded. Stantec will assist the CDA in directly retaining the services of remedial contractors per the requirements of 2 CFR 200.317 through 200.327.

- b. As described in the Stantec (2025) ABCA, the proposed cleanup will not directly impact adjacent or neighboring properties.

#### 14. Community Notification

- a. Draft ABCA. Revision 0 of the Stantec (2025) draft ABCA was prepared on December 16, 2025 and made available for public comment on January 2, 2026.
- b. Community Notification Ad. The applicant published a community notification ad in the local newspaper on January 2, 2026.
- c. Public Meeting. A public meeting was held to discuss the draft application and consider public comments. The meeting was held on January 19, 2026.
- d. Community Notification Documents. Per the grant guidelines, the following is attached:
  - The draft Stantec (2025) ABCA (**Attachment B3**)
  - Community notification ad (**Attachment B4**)
  - A summary of the comments received (**Attachment B5**)
  - The applicant’s response to those public comments (**Attachment B6**)
  - Meeting notes or summary from the public meeting (**Attachment B7**)
  - Meeting sign-in sheet/participant list (**Attachment B8**)

#### 15. 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 cleanup grant, if awarded.

The Community Development Authority of 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 Community Development Authority of 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 Community Development Authority of the City of Manitowoc received and considered 5 responses and selected Stantec.

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

To procure a remedial contractor, the Community Development Authority of the City of Manitowoc advertised the “River Point Development Phase 4” project for bid on January 29, 2025 with a due date of March 5, 2025 (35 days). The bid was published on the City’s website (Project #WS-25-2; Quest #9508083) and via press releases to Daily Report, McGraw Hill Construction Dodge, and Bid Ocean.com, and included notification that Davis-Bacon Act wage rates would be

enforced (for grant-eligible/grant-funded items). Bid responses were scored by **Business Organization; Management Outline and Project Approach; Experience and Capabilities; and Cost (25% of score)**. The Community Development Authority of the City of Manitowoc selected the sole bidder, Vinton Construction Company (Vinton).

The January 29, 2025 remedial contractor bid advertisement and Vinton’s contract are all available through OneDrive. Please email the grant applicant (Adam Tegen <ategen@manitowoc.org>) for the login and password.

Subrecipients. Subrecipients are not named in the grant application.

**Attachment B2**  
**Letter from the Wisconsin Department of Natural Resources**



January 16, 2026

Adam Tegen  
Executive Director  
Community Development Authority of the City of Manitowoc, Wisconsin  
900 Quay Street  
Manitowoc, Wisconsin 54220  
Via Email Mail Only to [ategen@manitowoc.org](mailto:ategen@manitowoc.org)

**Subject: State Acknowledgement Letter for Community Development Authority of the City of Manitowoc  
FY26 EPA Brownfield Cleanup Grant (River Point)**

Dear Adam Tegan,

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

The DNR is fully committed to a collaborative partnership with the CDA 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.

**FY26 Cleanup Grant: Site(s) Eligibility, Characterization, and Readiness for Remediation**

For FY26, EPA requests that certain applicants for cleanup grants submit a letter from the state describing property eligibility and whether there is a sufficient level of site characterization from the environmental site assessment for the remediation work to begin on the property(ies).

- **Eligibility.** This property is undergoing cleanup under Wisconsin's cleanup program and its governing administrative code, Wis. Admin. Code chs. NR 700-799, and statute, Wis. Stat. ch. 292. The state cleanup program is regulatory and nonvoluntary. This property is eligible for the Voluntary Party Liability Exemption (VPLE) program under Wis. Stat. § 292.15; the City has not enrolled this project in the VPLE program.
- **Site assessment and characterization status.** Site characterization is sufficient to allow remediation work to begin on the site. For the property described in the attached request, dated December 4, 2025, the applicant stated the following:

*The source(s) and vertical and horizontal extent(s) of impacts in the Phase 4 Redevelopment Area are sufficiently characterized to begin cleanup of the area. The City has retained a remedial contractor for*

*Phase 4 Redevelopment at the River Point District. Therefore, remediation work is ready to begin immediately.*

Based on the information provided by the applicant, the DNR believes site characterization is complete to an extent that allows remediation work to begin at this site.

Sincerely,

A handwritten signature in blue ink, reading "Roxanne N. Chronert".

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

Attachment:

Request dated December 4, 2025

cc:

Tauren Beggs, DNR NER – Tauren.Beggs@wisconsin.gov  
Denise Danelski, DNR NER – Denise.Danelski@wisconsin.gov  
Whitney Cull, Stantec – Whitney.Cull@stantec.com