

RE: Application Information Sheet – FY2026 U.S. EPA Brownfields Cleanup Grant Application, Kenosha Harbor District Project, Blocks A-D, Kenosha, Wisconsin

The City of Kenosha (City) is pleased to submit this application for United States Environmental Protection Agency (U.S. EPA) Fiscal Year (FY) 2026 Brownfields Cleanup Grant funding. Information requested in the grant guidelines is provided below.

1. Applicant ID: City of Kenosha, 625 52nd Street, Kenosha, Wisconsin 53140

2. Website: <https://www.kenosha.org>

3. Federal Funds Requested

a. Grant Type: Single Site Cleanup

b. Federal Funds Requested: \$3,658,862

4. Location: City of Kenosha, Kenosha County, State of Wisconsin

5. Property Information: Kenosha Harbor District Project, Blocks A-D, Kenosha, Wisconsin 53140. The property includes twelve parcels for which parcel tax identification numbers, addresses (where assigned), and recording document numbers are provided below.

Block	Tax Identification #	Street Address	Document No.
A	12-223-31-401-101	5 th Avenue	1165695
B	12-223-31-402-003	5403 7 th Avenue	1165695
	12-223-31-404-001	5413 7 th Avenue	1022304
	12-223-31-404-004	55 th Street	1022304
	12-223-31-404-005	55 th Street	1022304
	12-223-31-404-006	55 th Street	1022304
	12-223-31-404-007	55 th Street	1021783
C	12-223-31-403-001	5407 8 th Avenue	1837357
	12-223-31-402-004	54 th Street	1165695
	12-223-31-403-008	7 th Avenue	1837357
	12-223-31-403-009	700 55 th Street	1837357
D	12-223-31-426-017	54 th Street	1417670

6. Project Contacts

<p>Project Director Timothy Casey Director – Planning and Development City of Kenosha 625 – 52nd Street, Room 308 Kenosha, WI 53140 Phone: 262-653-4030 tcasey@kenosha.org</p>	<p>Highest Ranking Elected Official David Bogdala Mayor City of Kenosha 625 52nd Street, Room 300 Kenosha, WI 53140 Phone: 262-653-4000 mayor@kenosha.org</p>
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7. Population: City of Kenosha, 99,578 (U.S. Census Bureau, QuickFacts Estimate for 7/1/2024)

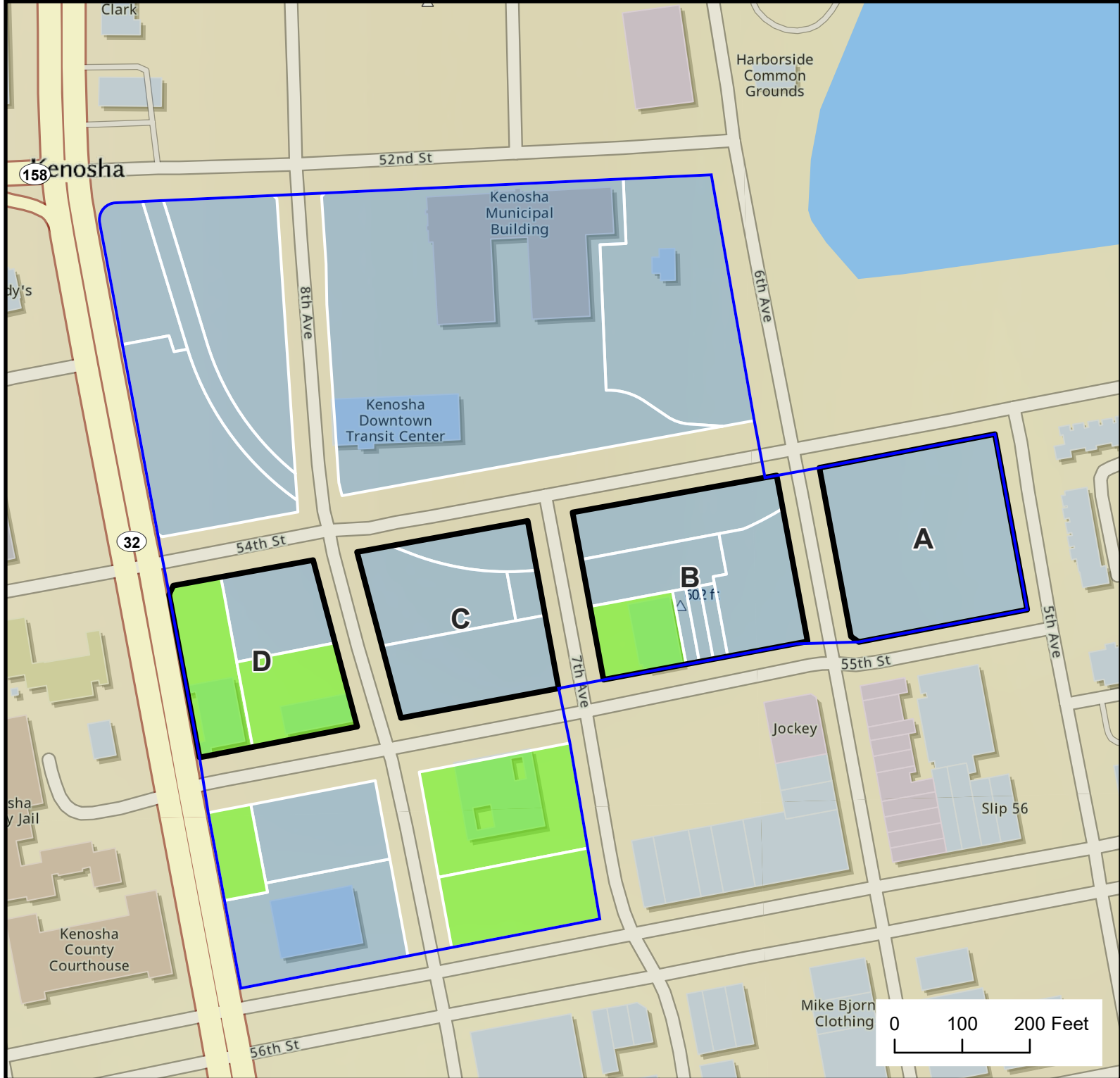
8. Other Factors Checklist

Other Factors	Page #
Community population is 15,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Narrative (page 3) and Attachments A1-A5
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures	Narrative (page 2)
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Narrative (page 2)
The target area(s) is impacted by a coal-fired power plant has recently closed (2015 or later) or is closing.	N/A

N/A = not applicable

9. Releasing Copies of Applications:

N/A.



Legend

- USEPA Cleanup Grant Project Boundaries
- Kenosha Harbor District Area
- City Owned Parcel
- Non-City Owned Parcel

N

Proposed Grant Implementation Area

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Overview of Brownfield Challenges and Description of Target Area: The Kenosha Harbor District (the “Project Area”) encompasses nine blocks within the central business district of the City of Kenosha, Wisconsin (the City). A tax increment district (TID #27) was established by the City for the Project Area in 2019 to provide funding for infrastructure and other improvements needed to support desired redevelopment. Each of the 9 blocks are referenced in redevelopment planning documents by letters (i.e., A through I). Five blocks (A, C, E, F, and H) are currently vacant land, while Block B houses parking lots and Block D is vacant except for a small, unoccupied commercial building scheduled for demolition within the next year. Block I is fully occupied by a new apartment building that is the first project completed as part of the Kenosha Harbor District redevelopment project. Block G contains the current City Municipal Building (constructed in 1947), a transit center for the City’s electric streetcar system, and the 1.5-acre Navy Memorial Park which overlooks the City Harbor and Lake Michigan. Census Tract (CT) 10 contains the Project Area and the City’s downtown. The Project Area is three blocks east of two of the City’s most disadvantaged CTs (9 and 11) which correlate with the Columbus, Uptown, and Washington Neighborhoods. CTs 9, 10, and 11 represent the Target Area for this Grant application.

Few U.S. cities have overcome the brownfield challenges faced by Kenosha during the past 35 years. These challenges include the closure of two former American Motors Corporation (AMC)/Chrysler auto plants that were the largest employers in the City for nearly 70 years. The oldest, the AMC “Lakefront Plant,” covered 73 acres on the City’s downtown waterfront and included Block A within the Project Area. The massive 5-story plant employed 5,500 workers when it closed in 1988, a year after AMC was acquired by Chrysler Corporation. The other AMC/Chrysler plant – the “Main Plant” was located 0.75 miles west of the Project Area within the Columbus Neighborhood and covered 107 acres (the equivalent of approximately 40 city blocks). The Main Plant began operation in 1902 but closed in 2010 following Chrysler Corporation’s bankruptcy, leaving another 575 workers unemployed and ending more than a century of auto manufacturing in Kenosha. To date, over \$50 million has been spent by the City, State of Wisconsin, and United States Environmental Protection Agency (EPA) remediating and installing new infrastructure within this one brownfield site.

Kenosha’s downtown and adjoining neighborhoods suffered a further blow in 2020 from rioting that occurred in the aftermath of the shooting of a resident, Jacob Blake, by a Kenosha Police Officer. The rioting caused more than \$50 million in damage to buildings and businesses, including at least 40 buildings that were completely destroyed – with 90% of the damage occurring within CT 10 and the central business district. Since the riots, the City and a broad coalition of residents, businesses, and organizations have worked to strengthen and rebuild the Target Area neighborhoods with projects such as the Uptown Lofts and the attached new library which opened in 2024, a new school, and other efforts focused on investments in education, workforce training, and public transportation. The EPA Grant will help advance a project that will continue the renewal of this area, create thousands of construction jobs and up to 890 permanent jobs, and provide an array of public amenities that can be enjoyed by residents and visitors alike.

1.b. Description of the Proposed Brownfield Site(s): The EPA Grant will be used for cleanup activities within Blocks A-D of the Project Area and represent the second phase of the Kenosha Harbor District Project – a larger project that will redevelop and transform the full 9-block Project Area. Blocks A-D contain 15 parcels totaling 6.15 acres, of which 12 parcels (4.95 acres) are owned by the City and are the “Site” for the Cleanup Grant. The remaining parcels are privately owned and will be remediated concurrently with the City-owned parcels, but funded using other sources.

All four blocks in the Site were fully developed by 1886, at which time Block A was occupied by the Northwestern Wire Mattress Co., a 43-acre site with several rail spurs, a warehouse, and hardwood lumber storage until it closed in 1959, when it was acquired by AMC and used for auto manufacturing (the AMC Lakefront Plant) until 1988. By 1990, the plant was fully demolished, and Block A has remained vacant for the past 35 years. Starting in 1852, Blocks B-D were occupied by the Bain Wagon Company, which by 1900 was one of the world’s largest wagon manufacturers. Block B housed a planing, sawing, sanding, and finishing building, an office building, and storage areas; Block C was used primarily for storage but held a box shop and painting building; and Block D was used for wagon stock sheds. In 1926, Bain ended operations in Kenosha, and by 1930s, all but two buildings had been demolished. A gas station was located on the corner of Block D in the 1940s and 1950s along with two warehouses on Blocks B and D. Pike Creek crossed through the Project Area, occupying several acres of land in what is now part of Blocks B, C, F, and G, but was filled with up to 15 feet of fill materials during 1958-59 after the Creek rerouted through a storm sewer along the north edge of the Project Area.

Environmental assessment borings completed to date on the Blocks A-D have documented the presence of historic fill materials throughout the Site with varying levels of contamination from the ground surface to depths of 9 to 31 feet below ground surface (bgs) on each block. The fill materials are predominantly soil but include demolition debris, suspected foundry wastes, and other wastes, and are impacted by select volatile organic compounds (VOCs); polynuclear aromatic hydrocarbons (PAHs), and metals (arsenic, cadmium, mercury, and lead) at concentrations that exceed applicable Wisconsin (WI) Chapter NR720 residual contaminant levels (RCLs) for groundwater protection and/or protection against direct contact on non-industrial properties. Groundwater in some areas is impacted by VOCs (including benzene and vinyl chloride) and PAHs at concentrations above WI Chapter NR140 groundwater standards. Layers of organic soil up to 20 feet thick underlie significant portions of the Site and are a source for the elevated methane concentrations measured on several blocks. Contaminated estuarine deposits are present to depths up to 50 feet bgs along the northern edge of Blocks

B and C, with impacts attributable in part to releases of coal tar from a former manufactured gas plant (MGP) on Block F.

1.c. Reuse Strategy and Alignment with Revitalization Plans: The Kenosha Harbor District Project traces its origin in part to the completion by the City in 1991 of a Downtown Master Plan that established a framework for reclaiming the City's lakefront following the closure of the former AMC Lakefront Plant. The Lakefront Plant site was acquired by the City, remediated, and with the exception of Block A, transformed into a vibrant downtown neighborhood named HarborPark, which now includes an electric streetcar system, a Public Museum, a 405-boat marina, over 400 apartments and condos, and a Civil War Museum – all completed in the early 2000s. However, as the HarborPark development neared completion, a new economic blow struck the City in 2010 with the closure of the former AMC Main Plant (by then named the Chrysler Engine Plant), creating another massive (107-acre) brownfield site just west of downtown and giving renewed urgency to the City's efforts to transform its economy from its historic reliance on manufacturing. This led to the completion of a Downtown Strategic Development (DSD) Plan in 2012 which established a goal of creating a walkable downtown center with enough residents and visitors for businesses to flourish. The DSD Plan also identified the desire by businesses for an additional downtown hotel, and the desire by residents for a public market (the highest ranked desired amenity). The Plan involved several partners listed in Section 2.e/f and input from > 1,000 residents.

In 2018, the City issued a request for proposals (RFP) for the 9-block Kenosha Harbor District Project Area (none of which is located in a federally designated floodplain). Six proposals were received. After the initial developer selected was unable to secure financing, two of the firms that submitted proposals in 2018 joined forces in 2023 (as Kenosha Downtown Partners, LLC [KDP]) and submitted a proposal for redevelopment for 8 of the 9 blocks within the Project Area (i.e., Blocks A-G, and I). The original developer retains development rights for Block H. After a year of negotiation, a development agreement was executed by the City with KDP in March 2024, which committed KDP to completing mixed use development projects over a 7- to 10-years having a minimum combined assessed value of \$450 million. KDP's proposed redevelopment project includes construction of 1,158 apartments, 95,545 ft² of retail space (including a grocery store, food market and food hall), 423,095 ft² of office space, a 200-room hotel, a new City Hall, over two miles of new sidewalks, over 350 trees, and four acres of green space including a new public park. The initial project, a \$55 million, five-story 158-unit apartment building on Block I opened for occupancy on 1/15/2026. The projects on Blocks A-D (for which EPA Cleanup Grant funding will be utilized) will include construction of 40 condominiums, three 7- to 10-story mixed use towers with a total of 633 apartments, 38,775 ft² of retail space (including the grocery), and structured parking for 921 cars. The first project within the Cleanup Grant Site is a \$70 million 7-story mixed use building expected to break ground on Block B in mid- to late-2026 that will provide 210 apartment units and 6,000-ft² of retail space. These initial projects will achieve nearly all the priorities identified in the DSD Plan for the Project Area as a whole.

1.d. Outcomes and Benefits of Reuse Strategy: The redevelopment projects on Blocks A-D are key to unlocking TID funding for use in advancing subsequent redevelopment projects on Blocks E through G, which will include construction of a new Municipal Building/City Hall on Parcel E and a 2.5-acre park and 1-acre public laneway on Parcel G. The success of the initial projects on Blocks A-D will strengthen the developer's ability to secure funding for the 200-room hotel, 367 additional apartments, 56,770 ft² of retail space, and 423,095 ft² of office space to be constructed on Blocks F and G. The central plaza, park, and laneway on Blocks F and G will be dedicated to the City upon completion.

In addition to creating nearly five acres of public green space, the Kenosha Harbor District Project as a whole will result in reconstruction of over two miles of sidewalks, with expanded planting areas, within which an estimated 350 new street trees will be planted. Many of the sanitary sewers in the Project Area, which are more than 100 years old, will be replaced where the existing sewers are located within the footprint of the new buildings. Green roofs will be constructed on several of the buildings. These measures will reduce stormwater runoff and future risks associated with street (pluvial) flooding occurring during extreme rainfall events and will also reduce heat island effects during extreme heat events. The development agreement with KDP requires the developer to design, construct, and install new stormwater management facilities for each of the eight blocks and adjoining public rights-of-way, including storm and surface water management facilities, and dedicate these to the City once completed. All of the proposed buildings will incorporate energy efficiency measures, and the developer is required to install Smart City and energy efficient light emitting diode (LED) street lighting throughout the Project Area.

1.e/f/g. Strategy for Leveraging Resources – Resources Needed for Site Characterization, Cleanup, and Reuse: Site Characterization Resources – The City is in the initial stages of implementing a \$500,000 FY2025 EPA Community Wide Assessment (CWA) Grant awarded within the past year for which the Project Area is included in that grant's Target Area (**Attachment A1**). In addition, in 2025 the City secured a \$107,000 Brownfields Site Assessment Grant (SAG) from the Wisconsin Economic Development Corporation (WEDC) for use in completing additional assessment activities on Blocks A-D (**Attachment A2**). An additional \$22,000 in matching funds is being provided by the City for that grant. Additional sources of funding include funds from the developer (which were used to complete initial assessments in 2023-24) and City funds available through TID #27. The City is eligible to pursue additional SAG funding from the WEDC once the SAG secured in 2025 is completed (anticipated to occur in 2026).

Cleanup Resources – It is anticipated that the EPA Cleanup Grant will be sufficient to fully fund soil remediation and vapor mitigation required for the proposed developments on the 12 grant-eligible City-owned parcels in Blocks A-D. The

developer will be responsible for an estimated additional \$1,149,880 in cleanup costs required for work in areas within the three privately-owned parcels in Blocks A-D. Both the City and the developer are eligible to apply for up to \$250,000 in Brownfield Cleanup Funding from the WEDC. The developer was successful in securing a \$250,000 WEDC Brownfield Cleanup in 2025 that was used to advance the initial development project completed in January 2026 on Block I and has applied for a second WEDC Brownfield Cleanup grant that will be used to help pay cleanup costs for developer-owned properties within Block B (**Attachment A3**). The City will collaborate in pursuing this additional cleanup funding, for which the EPA Cleanup Grant can serve to meet a 1:1 match requirement. Funding from TID #27 can also be used to help pay for any funding gap for cleanup costs associated with Blocks A-D.

Site Reuse Resources – The development agreement executed between the City and KDP in 2023 (**Attachment A4**) commits KDP to complete redevelopment projects on Blocks A-G and I that when complete will have a combined total assessed value of at least \$450 million. This includes a commitment to complete projects on Blocks A-D (the Cleanup Grant Site) with a total assessed value of \$143.6 million. KDP is responsible for securing private funding to complete the projects. The City has committed to supporting KDP’s ability to secure financing through the issuance of Municipal Revenue Obligation (MRO) Bonds, including \$22 million in MRO Bonds for Blocks B and C. The City has also committed to providing a loan of \$20,410,000 to further assist KDP in securing private financing for projects on Blocks A-C.

In 2019, the City established TID #27 to support redevelopment within the Project Area. Through the TID, the City can issue up to \$63.3 million in General Obligation Bonds to pay for required public improvements, including construction of public parking, demolition, site preparation, utility improvement, stormwater and related infrastructure improvements, and parks and other public green spaces. Finally, the developer has committed to constructing a new 90,000 ft² Municipal Building with an estimated value of \$36 million on Block E, in exchange for the transfer by the City to the developer of Block G. A copy of the Project Plan for TID #27 is provided as **Attachment A5**.

1.h. Use of Existing Infrastructure: The Project Area is located within one of the City’s oldest developed areas and as a result, is fully served by municipal water, sewer, natural gas, electric, and other required utilities. The Project Area also has exceptional access to public transportation, including the current City streetcar station (on Block G), and a Chicago metropolitan commuter rail network (Metra) station located three blocks to the west. Because the planned developments will extend across the full extent of each block, 2.05 linear miles of new sidewalks will be constructed within the Project Area, with expanded planting areas along the roadways for an estimated 350 new street trees. The developer (KDP) is required to construct and install new stormwater infrastructure throughout the Project Area, as well as energy efficient LED street lighting. TID #27 will fund any infrastructure improvements not paid for by KDP.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. The Community’s Need for Funding: The City is still emerging from the fiscal hole created during 1988-2000 from the closure of four of the City’s largest manufacturing plants (which were also the City’s largest employers and sources of local property tax revenue). These included the closure of: a) the 70-acre AMC Lakefront Plant in 1988 with 5,500 jobs lost, b) the 29-acre American Brass Company Plant in 1999 with 700 jobs lost, c) the 33-acre MacWhitely Wire and Rope Company in 1999, with 600 jobs lost, and d) the 107-acre Chrysler Engine Plant/AMC Main Plant in 2010 with 575 jobs lost. The economic impact from these closures cannot be overstated, as these job losses are only the direct jobs lost at the time of closure. For example, over 725 jobs had already been lost at the Chrysler Engine Plant in the 4 years prior to its closure. During 1999-2002, Chrysler invested \$624 million in a 450,000-ft² expansion of the Engine Plant, with plans for an additional \$450 million investment announced in 2007. By 2013, the 1.9 million ft² plant was fully demolished – reducing its assessed value to \$0. In spite of \$10 million in federal Troubled Asset Relief Program (TARP) funding secured by the City to address environmental liabilities, the total remedial costs incurred at this one site by the City to date exceed \$50 million. Thousands of supplier and indirect jobs were also lost as every direct job in manufacturing of durable goods jobs typically supports 2.89 supplier jobs¹, many of which were located in the Kenosha area due to the 80 or more-year presence of these companies in the City and well-established networks of local suppliers. The City has been aggressive in use of TID funding to address costs associated with these brownfield properties, with 27 active TIDs, but is near the 12% limit of total Municipal Equalized Value and now has the highest percentage of property value in TIDs among Wisconsin’s 10 largest cities.

In spite of the economic progress that has been made in recent decades, the City as a whole (and the Target Area CTs in particular) suffer from high poverty rates, low incomes, and high unemployment, as detailed in **Table 1** below.

Table 1. Economic Distress Data (American Community Survey [ACS] 2022 5-Year Estimates²)

Economic/Poverty Measures	CT9	CT10	CT11	City of Kenosha	State of WI	US
Median household income ^A	\$43,333	\$46,354	\$27,145	\$64,963	\$72,458	\$75,149
Per capita income ^A	\$20,042	\$43,911	\$18,542	\$33,894	\$40,130	\$41,261
Unemployment rate ^B	14.2%	8.9%	7.1%	5.4%	3.4%	5.3%

¹ <https://www.epi.org/publication/updated-employment-multipliers-for-the-u-s-economy/>

² Notes for Table 1. Data downloaded on 10/23/2024. All data are 5-year estimates for 2018-22.

Households w/ food stamp/SNAP benefits ^C	34.0%	25.8%	34.6%	16.3%	10.4%	11.5%
Poverty rate for all people	26.7%	20.1%	28.3%	14.6%	10.7%	12.5%
Poverty rate for under 18	32.1%	36.7%	15.7%	19.4%	13.3%	16.7%

A) In 2022 inflation adjusted dollars. B) Civilian population in labor force ≥16 years. C) Past 12 months. SNAP = Supplemental Nutrition Assistance Program.

2.b. Health or Welfare of Sensitive Populations: Several sensitive populations likely to experience elevated health risks from pollution are present at greater than average rates in the Target Area, including young children, the elderly, women aged 18-34 (a likely demographic to become pregnant, though number of pregnant women is not recorded and fluctuates), people with disabilities, low-income populations and people in poverty, and those with a serious disease burden. PolicyMap was used to identify sensitive populations in the Target Area. As shown on **Table 2**, sensitive populations are present in each CT within the Target Area. Bold red text indicates greater percentages than both the State of Wisconsin and the United States.

Table 2. Sensitive Populations in the Target Area (PolicyMap Data³, Based ACS 2022 5-Year Estimates)

Sensitive Population	CT-9	CT-10	CT-11	Wisconsin	United States
Population Aged 65 and Up	7.92%	25.2%	8.38%	18.03%	16.84%
Population Aged 5 and Under	5.36%	0.57%	11.32%	5.44%	5.7%
Women Aged 18-34	18.9%	24.17%	34.12%	21.38%	22.22%
People With a Disability	17.76%	29.46%	19.18%	12.04%	13.04%
Adult Asthma (%ile compared to US)	76	60	94	N/A	N/A
Coronary Heart Disease (%ile compared to US)	32	54	84	N/A	N/A
Low Income (Identified by USDA)	Yes	Yes	Yes	N/A	N/A
People in Poverty	24.6%	20.36%	24.23%	10.58%	12.44%

In addition to those broken down by CT in **Table 2**, data available from the Centers for Disease Control and Prevention (CDCP) Places indicates that the City overall has a greater incidence of age-adjusted high blood pressure, cancer, chronic obstructive pulmonary disease (COPD), coronary heart disease, and obesity among adults, indicating severely disease-burdened populations.⁴ The CDCP⁵ has detailed (i.e., CT-level) estimates for seven social indicators relevant to the health and welfare of residents in the Target Area. These indicators are summarized below.

Table 3 – Health-Related Social Indicators for the Target Area CTs (2021-22)

Measure (for adults in the past 12 months)	Rate	Percentile	Measure (for adults in the past 12 months)	Rate	Percentile
Utility services shut-off threat	12.3%	91.8	Housing insecurity	19.9%	91.7
Received food stamps	31.0%	90.4	Food insecurity	23.8%	91.3
Lack of social and emotional support	31.8%	91.2	Feeling socially isolated	37.4%	88.1
Lack of reliable transportation	14.0%	90.9			

A percentile value of 91.8 means that the average prevalence in the Target Area is higher (worse) than that in 91.8% of all Wisconsin CTs.

The rates are combined average rates for CTs 9, 10, and 11, and the percentiles are relative to those for all 1,525 CTs in Wisconsin. The data document that residents in the Target Area suffer from food, housing, and transportation insecurity, as well as social isolation and threat of utility shut offs. Housing in the three CTs is old and often in poor condition. Median housing values in CT10 skew higher (\$256,400) due to the presence of several hundred higher-end units constructed within the HarborPark development in the area formerly occupied by the AMC Lakefront Plant. However, the median values for owner-occupied housing in CTs 9 and 11 (\$114,200 and \$140,400) are less than the half the median value for housing in the U.S. (\$281,900) and are so low that they likely discourage investment and improvements by owners due to the difficulty of the owner’s recovering these investments as part of future sales. The poor condition of housing is reflected in a 21.2% combined vacancy rate for housing units in CTs 9 and 11 – over 3 times greater than the 6.7% vacancy rate for the City as a whole. Over 68% of the housing in CTs 9 and 11 was constructed in 1939 or earlier (versus 22.1% of housing in the City). In spite of the age and poor condition, the median monthly rent of \$933 being paid in CTs 9 and 11, is only slightly lower than the median monthly rent of \$992 for Wisconsin as a whole. The rents are particularly high considering the median household incomes in CT9 and CT11 of \$43,333 and \$27,145 are about half that for households in Wisconsin and the U.S. (\$72,458 and \$75,149). [Note: all data in the above paragraph are 5-year averages for 2018-22 from the American Community Survey].

Each of the Target Area CTs meet all four of the USDA definitions for areas having low food access. **Table 4** in Section 2.c presents data documenting the exceptionally poor health for residents in the Target Area. The reuse plans (and subsequent public improvements that will be funded through the new tax increment created) will provide an array of amenities and services that will directly or indirectly improve conditions for residents in the Target Area. Although the housing to be developed will be market rate, and targeted in part to higher income households, it will help in significantly

³ [Policymap.com](https://policymap.com)

⁴ <https://places.cdc.gov/?view=place&locationIds=5539225>

⁵ <https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Census-Tract-D/cwsq-ngmh>

increasing supply, which can help reduce rental prices across the Kenosha market, and also help lower rent in older apartments that are nearby through a “migration chain⁶” whereby new tenants can move into apartments previously occupied by residents moving into the Project Area. The project will provide >2 miles of new tree-lined sidewalks as well as nearly five acres of new public greenspace, which will help the 17.6% of residents in the Target Area with mobility disabilities as well as the high percentages of residents suffering from obesity and poor physical and mental health. A new grocery store will be provided on Block D, each of which will help to mitigate the food access challenges. The project will enhance connectivity throughout the downtown for those lacking cars, including the ability for residents to commute from the Project Area to downtown Chicago, expanding their access to potential jobs within the Chicago metro area.

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Table 4 presents data for 12 chronic disease and health indicators for the Target Area CTs, based on estimates developed by the CDCP. The average prevalence rates for the U.S. are provided, as well as the percentile ranking of the rates in the Target Area CTs relative to the rates for all 1,525 CTs in Wisconsin for which data are available.

Table 4. Health Measure Estimates for Target Area CTs

Health Measure ¹	Prevalence in Target Area CTs ²	Average Prevalence in the U.S.	Percentile Among All WI CTs	Health Measure ¹	Prevalence in Target Area CTs ²	Average Prevalence in the U.S.	Percentile Among All WI CTs ³
Current asthma	12.7%	9.9%	90.2	All Teeth Lost	20.2%	12.2%	92.0
Current cigarette use	21.7%	12.9%	90.3	Short Sleep Duration	39.9%	36.0%	91.0
Diagnosed diabetes	13.8%	12.0%	88.1	No Leisure Time Activity	30.2%	23.7%	90.6
Depression	26.1%	20.7%	91.2	Freq. Physical Distress	16.7%	12.7%	92.5
Obesity	48.5%	33.3%	94.9	Freq. Mental Distress	20.7%	15.8%	91.5
Stroke	4.2%	3.6%	79.0	Poor Self-Rated Health	25.6%	17.9%	92.0

Notes: 1) All data are for 2021-22. All measures are for adults, except “all teeth lost” which is for adults 65 years or older. 2) Combined averages for CTs 9, 10 and 11. 3) Percentiles are based on the combined average prevalence rates for the Target Area CTs versus those for all 1,525 CTs in WI. A percentile value of 94.9 means that the average prevalence in the Target Area is higher (worse) than that in 94.9% of all Wisconsin CTs.

The Target Area has higher prevalence rates for every disease and health outcome measure than the U.S. as a whole, and ranks above 90th percentile among all CTs in Wisconsin for ten measures. The three CTs that make up the Target Area rank between 86-99th percentile for low life expectancy compared to the US. The reuse projects in the Cleanup Grant Site (Blocks A-D) will construct of 0.81 miles of new tree-lined sidewalks and 0.83 acres of public greenspace and provide the tax revenue to fund an additional 1.24-miles of sidewalks and 4.13-acres of public greenspace. These will enhance residents’ opportunities for walking and other recreation and help reduce obesity and physical and mental distress.

The grant will support construction of 633 high-quality housing units on Blocks A-D that are free of asbestos containing materials (ACMs), mold, and other indoor air pollutants that can contribute to asthma. The project on Block D will include construction of a 21,185 ft² grocery store, enhancing residents’ access to affordable and healthy food, helping contribute to reductions in obesity, diabetes, and other diet-related health conditions. A public market/food hall will be constructed on Block G as part of a future phase of the project, further enhancing residents’ access to food.

2.d Economically Impoverished/Disproportionately Impacted Population: Economically Impoverished Population. As noted in Section 2.b, the Target Area has **nearly double the percentage of people in poverty** compared to the state and US overall. Further, the USDA identifies all three CTs in the Target Area as low income. CTs 9 and 10 have far higher rates of children under 5 in poverty than the state or nation, and all three CTs have at least double the state and national percentage of elderly people in poverty; a staggering **57% of CT-9’s 65+ population lives in poverty.**

Disproportionate Negative Environmental Consequences. The CDC-ATSDR identifies CTs 9 and 11 as “High” and CT 10 as “Moderate to High” on their environmental burden module³. As identified via PolicyMap, and summarized in **Table 5**, the Target Area’s impoverished population is already disproportionately impacted by a variety of environmental burdens that are associated with severe health impacts resulting from the area’s historic industrial operations.

Reuse Strategy Threat Reduction. The project will benefit economically impoverished populations by advancing job opportunities in the Target Area. Most jobs created in the County since 2010 are located within the Interstate 94 corridor 6 miles west of the Project Area, and for which access can be challenging for members of the disproportionate number of households in the Target Area with one or no vehicles. The projected \$247 million in construction with the planned projects on Blocks A-D alone could result in 1,359 direct, 1,186 indirect, 1,507 induced and 4,051 overall short-term jobs based on typical employment multipliers for construction projects in the U.S.⁷ The 423,095 ft² of office space, 95,545 ft² of retail, and 200 hotel rooms will bring an estimated 890 new permanent jobs to the Project Area, including many suitable

⁶ <https://www.upjohn.org/research-highlights/new-apartment-buildings-low-income-areas-decrease-nearby-rents>

⁷ [Updated employment multipliers for the U.S. economy | Economic Policy Institute \(epi.org\)](#). For construction, each \$1 million in final demand should result in 5.5 direct jobs, 4.8 supplier (indirect) jobs, and 6.1 induced jobs.

for residents with limited education^{8 9}.

Although most of the projects will focus on market rate housing, office buildings, and a hotel, these types of projects are necessary for the project to be economically viable, and the ability of the City to serve its disadvantaged residents is directed linked to growing the City's tax base. This is particularly true in Wisconsin, where local governments can only increase property taxes for operations based on the percentage increase in property values due to net new construction¹⁰. This single project, when completed, will increase the City's taxable property by nearly 5%. It will increase the number of households in the downtown area by up to 75%, which is essential to attracting businesses and services desired by residents in the Target Area, in particular a grocery store (planned on Block D) and a drug store.

The largest reduction in threat to populations that disproportionately share the negative environmental consequences from industrial operations in the Target Area is the reduction in overall contaminant load in a four-block Project Area, which lies in close proximity to residences and public buildings/parks. The cleanup plan will prevent direct contact with any remaining soil contamination, greatly reducing the site's threat to public health. The project will create amenities that will be accessible to all residents of the City, but in particular those living within walking distance of the Area.

2.e/f. Community Engagement – Project Involvement/Project Roles: As previously noted, development plans for the Site are fully aligned with the 2012 DSD Plan and are the result of years of planning projects that involved thousands of residents and dozens of partner organizations and stakeholders. The partners on **Table 6** below will assist in soliciting input from and providing information to neighborhood residents and businesses.

Table 5. Environmental Burden National Percentiles³

Environmental Indicator	CT-9	CT-10	CT-11
Ozone	93 rd	94 th	93 rd
Diesel Particulate Matter in Air	64 th	70 th	74 th
Risk Management Plan Facility Proximity	95 th	97 th	95 th
Toxic Releases to Air	72 nd	71 st	74 th
Traffic Proximity	83 rd	80 th	87 th
Underground Storage Tanks	85 th	91 st	96 th
Lead Paint Indicator	96 th	58 th	93 rd

Table 6 – Project Partners and Roles

Kenosha Area Business Alliance (KABA). Website: https://www.kaba.org/ . Contact: Nicole Ryf, President, 262-925-3466, nryf@kaba.org . Role: KABA is the economic development agency for Kenosha County. KABA was a key participant in completing the DSD Plan and will help attract businesses that will lease the commercial spaces in the future buildings. KABA will also be instrumental in workforce programs that will connect disadvantaged residents with short-term jobs associated with cleanup and redevelopment, and future long-term jobs.
Cobalt Smith. Websites: https://cobaltmke.com ; https://www.cdsmith.com . Contact: Scott Yauck, Authorized Representative, 414-271-5000, svauck@cobaltmke.com . Role: Cobalt Smith is the developer for Blocks A-G, and I. Under their agreement with the City, Cobalt Smith has committed to completing developments within the Project Area with a combined assessed value of \$450 million, including \$147 million on Blocks A-D.
Kenosha Lakeshore Business Improvement District (BID). Contact: Brit Windel, Director, 262-308-1417, info@godowntownkenosha.com . Role: The BID was created in 1986 to promote Downtown Kenosha. The BID Board meets monthly, with meetings open to the public, and will assist in performing outreach to, and soliciting input from, residents and property owners within CT10.
United Way of Kenosha County (UWKC). Website: https://www.kenoshaunitedway.org/ . Contact: Carolyn Friesch, CEO, 262-671-2207, cfriesch@kenoshaunitedway.org . Role: UWKC was established in 1923 to advance the common good and create opportunities for residents throughout the County. Their office at 5500 6 th Ave. is located adjacent to the Project Site. UWKC will share project information and solicit input from community-based organizations working to improve conditions and increase opportunities for disadvantaged residents in CTs 9, 10, and 11.
Kenosha Area Chamber of Commerce (KACC). Website: https://www.kenoshaareachamber.com/ . Contact: Dave Strash, President/CEO, 262-654-1234 ext. 150, dave@kenoshaareachamber.com . Role: KACC was established in 1916 and has over 700 members from business, educational, and nonprofit organizations. Their main office at 600 52nd St. is located one block north of the Project Area. They will share information on the project, including opportunities related to cleanup and construction work, with local businesses.

2.g. Incorporating Community Input: Following notice of award, the City will work with KDP to create and refine a community involvement plan (CIP) for communicating project information and progress to the local community and project partners. We will create a project website that is updated on a monthly basis, and that will include relevant plans, environmental reports, and allow visitors to submit comments, participate in surveys, and be included on a list to receive project updates by email. A similar website was developed and is in use by the City for the brownfield redevelopment projects occurring on the former AMC Main Plant site (<https://www.kin-kenosha.org>). The City is in the process of forming

⁸ [Energy Information Administration \(EIA\)- About the Commercial Buildings Energy Consumption Survey \(CBECS\)](#) This reference suggests a job density of approximately 1 job per 600 ft² of office space and 1 job per 920 ft² of retail space.

⁹ <https://financesonline.com/hospitality-statistics/> This reference suggests there is 1 direct job in hotels for every 2.5 rooms.

¹⁰ <https://www.dailycardinal.com/article/2024/10/constrained-by-state-law-wisconsin-cities-struggle-to-raise-enough-money>

a brownfields advisory committee (BAC) that will be used for implementation of its FY2025 EPA Brownfields Assessment Grant and will use the BAC to support community involvement efforts for the FY2026 EPA Cleanup Grant, if awarded. The BAC will meet quarterly and include representatives from the project partners listed on **Table 6**, and be used to inform and solicit input from these partners, with particular emphasis on disseminating information on employment opportunities during cleanup, construction, and in future developments, as well as planning for the public amenities on Blocks E-G. BAC meetings will be noticed and open to the public. The City will host community meetings at approximately 6-month intervals to provide updates on the project and to solicit public input. All environmental reports will be submitted for review by the WDNR and thereby be accessible to the public for viewing and downloading on the WDNR’s Bureau of Remediation and Redevelopment Tracking System (BRRTS) website. Links to reports will also be provided on either the City’s website or the project website. Factsheets in both English and Spanish will be created and updated as cleanup and development activities are initiated on each block. Information will be shared on partner websites, in newsletters, and via social media. The project has received extensive coverage in the local newspaper and on local television and radio stations, and we expect this to continue as different phases of the project proceed, with coverage solicited through news releases and ceremonies marking the official groundbreaking, topping off, and grand opening of buildings on each block.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan: Contaminated Media to be Addressed: The primary media to be addressed is contaminated soil and fill materials present throughout the Site to depths of 9 to 31 feet bgs. The fill materials are associated with the long-term industrial use of the area dating back to the 1850s. Approximately 40% of Blocks B and C are within the footprint of a 100 to 250-foot-wide former creek and harbor area that was filled in 1958-59, as part of a project permanently rerouting the final segment of Pike Creek through a 12-foot diameter storm sewer. The fill materials contain soil as well as demolition debris, suspected foundry wastes, and other waste materials, and are impacted with VOCs, PAHs, and metals. Groundwater beneath the Site is impacted in some areas by VOCs and PAHs, but no specific remedial activities are expected to be required based on similar conditions and WDNR approvals provided for the recently completed redevelopment of Block I. All new buildings to be constructed in the Site are required to have active vapor mitigation systems (VMSs) to address vapor intrusions threats including methane.

Cleanup Methods: The cleanup approach for Blocks A-D was developed in part based on the recently completed redevelopment project on Block I which included a 61,875-ft² underground parking garage. The buildings on Blocks A-D will be developed with only partial basements, to help minimize the quantity of contaminated fill materials that will need to be excavated and landfilled. The buildings will also be constructed with augered cast-in-place or driven pile foundation systems. Subsurface materials to be managed will primarily be materials generated during construction of foundations and installation of underground utilities. Although contamination levels vary, all of the soil will need to be disposed of at a licensed solid waste landfill. The floor slabs for future buildings will serve as permanent engineered barriers to protect against future direct contact with near-surface contaminated soil that remains following construction. The City’s development agreement with KDP requires that active VMSs be installed in each building. The VMS will be similar to that installed by KDP for the new building on Block I which includes a 4-inch minimum thickness gravel aggregate layer beneath the floor slab covered by a 30-mil VOC-resistant membrane, 3-inch diameter perforated polyvinyl chloride vapor collection piping, multiple sub-slab vacuum monitoring/vapor sampling points, 4-inch diameter vent riser pipes extending to the roof, and all-weather explosion-proof roof-top blower units.

Disposal requirements: Three types of contaminated materials will need to be disposed of off-site: a) soil with low-levels of contamination and no debris or waste materials, which could be used as “daily cover,” b) soil with low-levels of contamination intermixed with debris, and c) soil with elevated concentrations of one or more contaminants. All of these materials are anticipated to be non-hazardous and will be disposed of at a local solid waste landfill.

Description of Tasks/Activities and Outputs

3.b/c/d/e. Project Implementation, Anticipated Schedule, Task/Activity Leads, and Outputs: The project will be completed in three phases, with construction of buildings to begin in mid- to late-2026 for Block B, late 2027/early 2028 for Block C, and late 2028/early 2029 for Blocks A and D.

Task 1 – Cooperative Agreement Oversight, Outreach, and EPA Reporting
<p>i. Activities: City staff will carry out programmatic oversight and grant administration activities. No grant funds are being requested for City personnel, fringe, travel, equipment, supplies or administrative costs. Grant funds will be used by the City to contract with a qualified environmental professional (QEP) to support outreach and EPA-required reporting activities. Outreach activities will include: a) public meetings, b) BAC meetings, c) updates on the City’s website, d) preparation of fact sheets and mailers, and e) other outreach activities as detailed in Section 2.g. Grant management activities will include: a) biweekly calls with the EPA Project Officer, b) procurement of a QEP firm through a compliant qualifications-based procurement (QBP) process. Reporting activities will include: a) quarterly progress reporting, b) Property Profile Form submission and completion of updates in the Assessment, Cleanup & Redevelopment Exchange System (ACRES), and c) completion of a final project closeout report.</p>
<p>ii. Schedule: Retain QEP (by 5/1/2026). Quarterly progress reports will be submitted by Jan. 30th, Apr. 30th, Jul. 30th, and Oct. 30th of each year, with the first due on Jan 30, 2027. Annual financial reports will be submitted by Oct. 30th, with the first due on</p>

<p>Oct. 30, 2027. Grant closeout by Q4 FY30.</p> <p>iii. <u>Leads:</u> The City will lead this task with support from the QEP.</p> <p>iv. <u>Outputs:</u> a) Outreach meetings (16 BAC and 8 community) with notices, agendas, presentations, sign-in sheets, and meeting notes. b) Outreach materials (fact sheets; results summary sheets; website updates with all materials prepared in both Spanish and English). c) Quarterly progress reports (QPRs; 16 total), final closeout report, and ACRES updates. d) Procurement documentation for the QEP.</p>
<p>Task 2 – Remedial Design Plans and Reports</p>
<p>i. <u>Activities:</u> Initial activities under Task 2 will include: a) completion of threatened or Endangered Species Act (ESA §7(a)(2)) and National Historic Preservation Act (NHPA §106) review activities, as appropriate for Blocks A-D, b) preparation of one or more final Analysis of Brownfield Cleanup Alternatives (ABCAs) as redevelopment plans are finalized for each block, c) preparation of a quality assurance project plan (QAPP), and d) preparation of remedial action option (RAO) report for the initial block targeted for construction (Block B). It is planned to prepare separate submittals for WDNR under this task for each block, including RAO reports, exemption requests to build on historic fill sites, landfill approvals, and design plans for the VMS. After remedial work is completed on each block, the QEP will complete a remedial action documentation (RAD) report, including as-built drawings for the VMS and a closure request with supporting documentation.</p> <p>ii. <u>Schedule:</u> The City will seek approval from EPA to begin work on the ESA/NHPA reviews as a pre-award activity. It is anticipated that the QEP will be under contract by 5/1/2026 and be able to begin work immediately on the final ABCA, the QAPP, and the required documents needed for development projects to begin on Block B in mid- to late-2026. These same documents for Blocks A, C and D will be completed 3-4 months before the planned start of construction on those blocks. The RAD reports, as-built drawings, and case closure requests will be completed alongside work under Tasks 3 and 4 on each block.</p> <p>iii. <u>Leads:</u> The QEP will prepare outputs for Task 2, under the direction of the City, and with input and review of all submittals provided by developer (KDP) representatives.</p> <p>iv. <u>Outputs:</u> a) ESA/NHPA screening documentation. b) Final ABCA(s). c) Approved QAPP. d) RAO reports and WDNR approval letters (4 of each). e) Historic fill exemption requests and WDNR approval letters (4 of each). f) Landfill disposal approval documentation. g) VMS design plans and WDNR approvals (4 of each). h) RAD reports including as-built drawings (4 total). i) Case closure requests and WDNR approval letters (4 of each).</p>
<p>Task 3 – Contaminated Soil Management and Disposal</p>
<p>i. <u>Activities:</u> Task 3 will include activities necessary to manage/dispose of soil generated during construction of partial basements and foundations for the new buildings, and installation of utilities on each block. No grant funding is being requested for work by City staff in overseeing this task, nor for stormwater management and other activities needed for overall construction. Funding is requested <u>only</u> for reimbursement of costs for: a) trucking of contaminated soil/fill to the landfill, b) landfill tipping fees, and c) associated oversight by the QEP. The QEP will be on site for up to four weeks on each block to oversee and document soil removal activities.</p> <p>ii. <u>Schedule:</u> Soil management/disposal activities on each block will be completed during the first 6-8 weeks of construction for each building (late-2026 for Block B, late 2027/early 2028 for Block C, and late 2028/early 2029 for Blocks A and D).</p> <p>iii. <u>Leads:</u> The City and developer will work closely together on bidding, which may be integrated into bidding for construction work for on each block's buildings. The overall development is subject to City DBE requirements that mirror those for EPA.</p> <p>iv. <u>Outputs:</u> a) Procurement/bidding documentation for the trucking firm and landfill disposal costs. b) Davis Bacon Wage Act (DBWA) compliance documentation. c) Landfill disposal documentation. d) Trucking and disposal at a landfill of an estimated 48,775 CY of contaminated soil and fill (including 5,630 CY from Block A, 14,850 CY from Block B, 13,620 CY from Block C, and 12,675 CY from Block D) of which 35,356 CY will be eligible for grant funding and 13,419 CY paid for by the developer. e) Notes and records compiled by the QEP during observation of trucking and disposal activities.</p>
<p>Task 4 – VMS Installation</p>
<p>i. <u>Activities:</u> Task 4 will include activities associated with installation and commissioning of the VMS system in each building. No grant funding is being requested for work by City staff in managing this task. The QEP will perform periodic inspections and observation of VMS installation activities.</p> <p>ii. <u>Schedule:</u> VMS installation activities on each block will begin 6-8 weeks after the start of construction of buildings and the completion of initial work on installation of foundations (i.e., in late 2026 for Block B, late 2027/early 2028 for Block C, and late 2028/early 2029 for Blocks A and D). In general, VMS installation will begin following the completion of activities under Task 3 for each block. Initial activities will include installation of the subslab collection piping, 4-inch compacted gravel layer, vapor membrane, and vapor monitoring points. Installation of riser pipes, rooftop blowers, and electrical controls will be completed as construction progresses upwards in each building. Commissioning of the VMS in each building will occur prior to occupancy.</p> <p>iii. <u>Leads:</u> As with Task 3, the City will work closely with the developer to complete bidding for the VMS, in multiple phases if needed, as individual buildings are constructed over the 4-year project period.</p> <p>iv. <u>Outputs:</u> a) Procurement/bidding documentation for the VMS installation and commissioning. b) DBWA compliance documentation. c) Installation of active VMSs in all buildings on Blocks A-D, with an estimated combined building footprint area of 223,579 ft² (including 26,374 ft² on Block A, 71,175 ft² on Block B, 65,282 ft² on Block C, and 60,748 ft² on Block D) of which 168,140 ft² will be eligible for grant funding and 55,439 ft² paid for by the developer. d) Notes and records compiled by the QEP during observation of VMS installation activities.</p>

3.f. Cost Estimates: The City is requesting \$3,658,862 in EPA Cleanup funding as detailed below.

Budget Categories	Task 1	Task 2	Task 3	Task 4	Administrative	Totals
	Grant Mgmt., Outreach & Reporting	Remedial Design, Plans, and Reports	Soil Management and Disposal	VMS Installation		
Contractual	\$39,480	\$204,600	\$162,800	\$74,800	\$0	\$481,680
Construction	\$0	\$0	\$1,902,369	\$1,261,013	\$0	\$3,163,382
Other	\$0	\$13,800	\$0	\$0	\$0	\$13,800
Total Direct Costs	\$39,480	\$218,400	\$2,065,169	\$1,335,813	\$0	\$3,658,862
Indirect Costs	\$0	\$0	\$0	\$0	\$0	\$0
Total Fed. Funding	\$39,480	\$218,400	\$2,065,169	\$1,335,813	\$0	\$3,658,862

Task 1 – Outreach, Grant Management, and Reporting: Total Budget = \$39,480

Contractual costs of \$39,480 for the QEP include: a) \$10,240 to assist with QPRs & ACRES updates (16 quarters; 4 hrs/quarter; \$160/hr), b) \$6,500 to finalize ABCA, c) \$9,600 to prepare presentations & attend 8 public meetings @ \$1,200/meeting), d) \$8,000 to attend BAC meetings (16 mtgs; \$500/mtg), and e) \$5,140 for project closeout reporting.

Task 2 – Remedial Design, Plans, and Reports: Total Budget = \$218,400

Contractual costs of \$204,600 for the QEP include: a) \$32,000 for RAO Reports (4 @ \$8,000), b) \$32,000 for RAD Reports (4 @ \$8,000), c) \$32,000 for NR726 Closure Requests (4 @ \$8,000), d) \$4,000 for Exemptions to Build on Historic Fill Sites (4 @ \$1,000), e) \$80,000 for VMS design plans (4 buildings @ \$20,000 each), f) \$6,000 for landfill approvals (4 blocks @ \$1,500/block), and g) \$18,600 for QEP project management costs (= 10% X \$186,000).

Other costs of \$13,800 for WDNR review fees, include: a) \$4,200 for RAO Reports (4 @ \$1,050), b) \$1,400 for RAD Reports (4 @ \$350), c) \$5,400 for closure requests (4 @ \$1,350), and d) \$2,800 for historic fill site exemptions (4 @ \$700).

Task 3 – Contaminated Soil Management and Disposal: Total Budget = \$2,065,169

Contractual costs of \$162,800 for the QEP include: a) \$128,000 for 800 hrs of soil management/disposal oversight (4 blocks; 20 days/block; 10 hrs/day; \$160/hr), b) \$20,000 for vehicle mileage and equipment costs (4 blocks; 20 days/block; \$250/day), and c) \$14,800 for QEP project management costs (= 10% X \$148,000). **Construction costs of \$1,902,369** are for trucking/disposal of contaminated soil and include: 1) \$295,688 on Block A (5,630 CY @ \$52.52/CY), 2) \$639,536 on Block B (12,177 CY @ \$52.52), 3) \$743,924 on Block C (13,620 CY @ \$54.62), & 4) \$223,221 on Block D (3,929 CY @ \$56.81).

Task 4 – VMS Installation: Total Budget = \$1,335,813

Contractual costs of \$74,800 for the QEP include: a) \$64,000 for 400 hrs of VMS installation oversight (4 blocks; 10 days/blk; 10 hrs/day; \$160/hr), b) \$4,000 for vehicle mileage and equipment (40 days; \$100/day), and c) \$6,800 for QEP project management costs (= 10% X \$68,000). **Construction costs of \$1,261,013** are for VMS installation and include: a) \$193,058 for Block A (26,374 ft² @ \$7.32/ft²), b) \$422,011 for Block B (57,652 ft² @ \$7.32/ft²), c) \$496,796 for Block C (65,282 ft² @ \$7.61/ft²), and d) \$149,148 for Block D (18,832 ft² @ \$7.92/ft²).

Note: Construction costs Tasks 3 and 4 assume payment of prevailing wages under the DWBA, and are based on bid unit rates of \$50.50/CY for trucking and disposal of soil/fill materials, and \$7.04 ft² for VMS installation, obtained by the developer in Fall 2024 for on-going work at Block I. The higher unit rates used in estimates for Blocks A-D are based on these rates, assuming annual inflation of 4%, and the previously detailed schedule assumptions for the work in each block. The budget excludes costs for management/landfilling of soil, and VMS installation, for costs incurred in the 19% of Block B and 69% of Block D that are not owned by the City, and which are therefore ineligible for the grant. The total additional non-grant eligible cleanup costs for Blocks B and D are estimated to total \$1,149,880.

3.g. Plan to Measure and Evaluate Environmental Progress and Results: The expected outcomes are detailed in the development agreement between the City and KDP (included as **Attachment A5**). The City will closely track and monitor progress on cleanup of the Project Area throughout the project period. Upon notification of award, tasks, subtasks, milestones and reporting requirements specific to the EPA grant will be integrated into a master project schedule that will be maintained in Microsoft Project and updated on a monthly basis. The **near-term cleanup outputs and outcomes** are closely linked to the progress of construction activities on each block, are easy to track, and will be documented as RAD reports and “as built” drawings for the VMS are completed for each block as soon as construction is completed. The **specific outputs** associated with technical reports, plans, and approvals, will be tracked and documented in ACRES and the QPRs. The **near-term redevelopment outcomes** will include: 1) the total private investment and other funding leveraged, 2) the increase in assessed value for Blocks A-D, 3) the number of housing units constructed, 4) the square footage of retail space constructed, 5) the length and area of new sidewalks constructed, 6) the number of street trees planted, 7) the square footage of new public green space created, 8) the number of direct construction and cleanup jobs created. These will also be relatively straight forward to track and measure. **Longer terms outcomes** will include: 1) completion of additional projects on Blocks E-G, 2) the increase in the various local government tax revenues linked to the project, 3) the creation of up to 890 permanent jobs within the Project Area, 4) the use of the new public green spaces and amenities that are created, 5) the occurrence of new developments, investments, or increase in property values in blocks surrounding the Project Area, and 6) improvements in economic conditions, health, and food access for residents

in CTs 9, 10, and 11. These outcomes will be tracked by Kenosha Department of City Development (DCD) staff.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a/b. Programmatic Capability – Organizational Capacity, Structure and Description of Key Staff: Organizational Capacity and Structure: The grant will be administered and coordinated by the Kenosha DCD, which includes ten core staff members with the organizational capacity to effectively manage this grant. The Kenosha DCD has successfully managed previous EPA Brownfields Grants and the cleanup and successful redevelopment of other large and challenging brownfield sites. They are highly experienced in all phases of grant administration, including technical, administrative, financial, and reporting requirements. The project will also involve collaboration with other City departments and entities, including the Mayor’s Office, Common Council, City Attorney’s Office, Departments of Public Works and City Parks, and the Redevelopment Authority of the City of Kenosha (RACK).

Key staff who will oversee the grant activities include: **Project Director:** Tim Casey is the City’s Director of Development and has over 30 years of experience in community and economic development, as well as private- and public-sector real estate development. He has a Master’s Degree in Urban Planning from the University of Wisconsin (UW)-Milwaukee. He will be responsible for overseeing the project and securing City staff and resources necessary for the project to succeed.

Project Manager: Abigail Huff is a Community Development Specialist with the City DCD helping to lead projects involving redevelopment of brownfields, historic preservation, and community partnerships. She has a master’s degree in Historic Preservation and has helped manage the Kenosha Harbor District redevelopment efforts for the past one-half year.

Brownfields Specialist: Lanette Altenbach is a brownfield specialist who joined the City in 2024 after retiring from over 35 years working as an environmental consultant. She has worked extensively on brownfields projects within the City and throughout the Midwest, in particular the former Chrysler Engine/AMC Main Plant for which she managed over \$10 million of assessment and cleanup activities on behalf of the City. She is an expert in assessment/cleanup of brownfields and will review all technical documents and reports prepared by the QEP.

4.c. Acquiring Additional Resources: The City has effective systems in place for procuring any additional expertise or resources needed to implement the grant and the planned redevelopment projects. Since 2010, the City has procured consultants and contractors for over \$50 million of activities completed at the former Chrysler Engine Plant alone. For EPA or other federal grant funded projects, the City DCD or other relevant city department identified the need for a consultant or contractor and then develops a draft Request for Proposal (RFP), which is reviewed by the City Attorney’s Office and the City Finance Department, which then issues the RFP on the Finance Department’s “Bid Solicitations” web portal. Vendors are required to register and complete a Vendor Information Form, whereby the vendors receive procurement notices by email. Open competition is mandated, with RFPs publicly posted and including detailed evaluation criteria. Proposals must be submitted by vendors in sealed envelopes by the specified deadlines. Proposals are evaluated and scored in writing by 3 or more City staff. Interviews may be conducted with the vendors having the highest scores. The City completes over 50 formal bids or RFPs per year utilizing these procedures.

4.d. Past Performance and Accomplishments (Currently Has or Previously Received an EPA Brownfields Grant)

4.d(1). Accomplishments: FY2006/07 Brownfield Community Wide Assessment (CWA) Grants; BF00E01401/BF00E40901, \$400,000 (combined); 10/1/2006 and 10/1/2007 to 10/31/2011): Funding was used to complete Phase I and II ESAs for 14 properties, 12 of which were cleanup sites within the former Chrysler Engine/AMC Main Plant. These assessments helped guide >\$50 million of subsequent environmental cleanup at the site. In 2022, the City adopted a \$1 billion master plan¹¹ for the site, now named the “[Kenosha Innovation Neighborhood](#)”, and first two projects were completed in 2025 and include a \$23.5 million 64,000-ft² “Kenosha Innovation Center” and a \$18.4 million 48,602 ft² school (the Lakeview Technology Academy) that is serving about 400 students¹².

FY2025 Brownfield CWA Grant; BF001E03230, \$500,000; 10/1/2025 to 9/30/2029): The FY25 CWA grant is in the initial stages of implementation and covers the same Target Area as this grant. The grant agreement was finalized in October 2025. From November 2025 to January 2026, the City completed a competitive RFP for QEP services. A contract with the selected QEP firm is expected to be finalized in February 2026, after which the City anticipates moving forward immediately with formation of BAC, initial outreach meetings, preparation of the QAPP, and initial assessment activities.

4.d(2). Compliance with Grant Requirements: The City has complied with all work plan, schedule, terms and conditions, and timely and acceptable reporting requirements associated with the previous EPA Grants. The grants awarded in FY2002/03 and FY2006/07 are closed and believed to have been fully expended. Information for all sites assessed and remediated is current in ACRES. **Open Agreements – FY2025 Brownfield CWA Grant; BF001E03230, \$500,000; 10/1/2025 to 9/30/2029):** The City is in the initial stages of implementing its most recent grant, having in January 2026 completed the key step of procuring a QEP firm. Although no funds have been expended to date, it is anticipated that significant funding will be expended this year and that the grant will be fully expended well before the official project end date.

¹¹ https://www.kin-kenosha.org/files/uqgd/6ff5fd_8b913bef8ae548a9816bb26b0728d479.pdf

¹² <https://www.kaba.org/news-item/the-kenosha-area-business-alliance-and-its-partners-to-break-ground-on-the-new-lakeview-technology-academy-at-the-kenosha-innovation-neighborhood/>

Application by the City of Kenosha for an FY2026 EPA Brownfield Cleanup Grant for the
Kenosha Harbor District Project – Blocks A-D, Kenosha, Wisconsin

THRESHOLD CRITERIA FOR BROWNFIELD CLEANUP GRANTS

1. Applicant Eligibility

The City of Kenosha is a local unit of government and as such, is eligible for a United States Environmental Protection Agency (EPA) Brownfields Cleanup Grant.

2. Previously Awarded Cleanup Grants

The Site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The City does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Site contains twelve parcels, and the City is the sole owner of all parcels. If awarded a Cleanup Grant, the City will retain ownership of the Site for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of the Site.

5. Basic Site Information

Name of Site: Kenosha Harbor District Project (Blocks A-D)

The parcel identification numbers, street addresses, document numbers, land area, and acquisition dates for the parcels are summarized on the table below. The parcels have each been assigned a reference number for use in this document. All parcels are located within the 53140-zip code area.

Block	#	Tax Identification #	Street Address	Document No.	Area (acres)	Date of Acquisition
A	1	12-223-31-401-101	5 th Avenue	1165695	1.60	Pre-1999
B	2	12-223-31-402-003	5403 7 th Avenue	1165695	0.46	Pre-1999
	3	12-223-31-404-001	5413 7 th Avenue	1022304	0.29	4/29/1996
	4	12-223-31-404-004	55 th Street	1022304	0.05	4/29/1996
	5	12-223-31-404-005	55 th Street	1022304	0.05	4/29/1996
	6	12-223-31-404-006	55 th Street	1022304	0.05	4/29/1996
	7	12-223-31-404-007	55 th Street	1021783	0.41	4/29/1996
C	9	12-223-31-403-001	5407 8 th Avenue	1837357	0.53	2/26/2019
	10	12-223-31-402-004	54 th Street	1165695	0.22	Pre-1999
	11	12-223-31-403-008	7 th Avenue	1837357	0.07	2/26/2019
	12	12-223-31-403-009	700 55 th Street	1837357	0.61	2/26/2019
D	13	12-223-31-426-017	54 th Street	1417670	0.42	Pre-1999
Total					4.85	

6. Status and History of Contamination at the Site

Application by the City of Kenosha for an FY2026 EPA Brownfield Cleanup Grant for the
Kenosha Harbor District Project – Blocks A-D, Kenosha, Wisconsin

6.a. Predominant Type of Contamination (Hazardous Substance or Petroleum)

The contamination at the Site is predominantly associated with hazardous substances. No discreet sources of petroleum impacts have been identified to date.

6.b. Historical and Current Uses of Site

Block A: By 1886, Block A was occupied by the Northwestern Wire Mattress Company, and contained railroad crossings, a warehouse, and hardwood lumber storage. The southwest corner of the block was occupied by a telegram office and a stoves and tin shop in 1886. The Kenosha Carriage Company replaced the stoves and tin shop by 1890, and in 1894, a furnishings store was present in this portion of the block. The eastern portion of the block was occupied by 1894 by the Palmetteer & Kipp Lumber Yard. In 1900, the Kipp-Montgomery Lumber Company occupied a majority of the block, with a furniture store present in the southwest corner. By 1905, only the Montgomery Lumber Company was present. In 1911, all except the southwest corner and a small office in the northwest area was occupied by lumber piles listed under the Simmons Manufacturing Company. The office had gone by 1918, and a manufacturing facility was built that extended onto the southeastern portion of the block. The mattress factory eventually expanded to occupy 43-acres but closed in 1959, after which the former manufacturing facility (including Block A) was acquired by American Motors Corporation (AMC) and used for automobile manufacturing. The AMC “Lakeside Plant” which included Block A eventually occupied a total area of 70 acres and employed 5,500 workers at the time it was permanently closed in 1988, a year after AMC was acquired by Chrysler Corporation. By 1990, the buildings had been demolished. By 2000, general infrastructure improvements required for redevelopment of the former AMC plant were completed that included reconstruction of 6th Avenue along the west side of Block B, construction of new streets and sidewalks on the north and east sides of Block B. This work appears to have included removal of remnant building slabs and general grading and seeding of the block which has been maintained by the City as a vacant grass covered development Site until present.

Block B: By 1886 (as documented on the initial Sanborn fire insurance map), Block B was occupied by the Bain Wagon Company; a planing, sawing, sanding, and finishing building was located on the southwestern portion of the block, an office building in the southeast corner, and the rest was mainly used for storage. Other records suggest that use of Block B by the Bain Wagon Company may date back to as early as 1852, by which time a railroad extension passed SW-NE through the center of the block. An arm of the Kenosha Harbor formed by Pike Creek occupied the northwestern portion of the block at this point in time. An engine room was added to a storage building near the center of the block by 1894. Railroad tracks passed over the block from the northeast corner to the center of the west side. By 1900, a meat shop occupied the northeast corner of the block. By 1911, the engine room and warehouse building appear to have been expanded and a beer depot was built in the northeast corner of the present-day block.

The Bain Wagon Company reportedly began operations on or near Parcel B in 1852 and by 1900 was one of the largest wagon manufacturers in the world. By 1926, Bain had ended production in Kenosha, and by the 1930s the factory buildings had been demolished. By 1949, only two buildings, one furniture warehouse and one small building (possible restaurant), remained in the southern portion of Block B. A small railroad spur extended into the northern half of the block. By 1969, auto parking was present on the block. Pike Creek was filled in during 1958-59, including the northern portion of Block B, with the former estuary

Application by the City of Kenosha for an FY2026 EPA Brownfield Cleanup Grant for the Kenosha Harbor District Project – Blocks A-D, Kenosha, Wisconsin

rerouted through 11- to 14-foot diameter sewers located along the north edge of Blocks F and G (outside of the Project Area). The building on Block B was utilized as a furniture store until the 1990s before being converted for office use. During the 2000s, the parcels owned by the City were used as parking lots, their current use. The small office remained in use by a local travel agency until purchased by the developer in 2023. The building was demolished by the developer sometime between February 2024 and March 2025, and that portion of the block used as a staging area for equipment and materials utilized in construction of a new mixed-use building on Block I.

Block C: In 1855, the arm of Kenosha Harbor formed by Pike Creek occupied approximately 40% of the block (including all of the northeast corner). A tributary to Pike Creek crossed through the southern portion of the block, and a railroad extension crossed through the southern portion of the block. By 1886, the eastern side of Block C was occupied by the Bain Wagon Company. As was true for Block B, use of Block C by Bain Wagon Company may have dated back to as early as 1852. In 1886, most of Block C was in use for lumber storage, with a box shop/painting operations/storage building extending into the southeast corner. A handful of dwellings were present on the western side of the block. The arm of Kenosha Harbor formed by Pike Creek still occupied 5-7% of the land area within the block in the extreme northeast corner. Railroad tracks extended across the southeast corner of the block. By 1905, only one dwelling remained on the block (in the northwest corner) and the southeastern portion of the block was occupied by an oil house. A larger warehouse was constructed on the west side of the block by 1911. By 1926, Bain had ended production in Kenosha, and by the 1930s the factory buildings had been demolished. By 1949, Block C was empty of buildings and railroad tracks. By 1969, a roller-skating rink and newspaper distributor were located on the block. A portion of Pike Creek which extended onto the northern edge of Block C was filled in during 1958-59. During the 2000s, several commercial and community service organizations occupied the buildings until 2019 when they relocated, and the City purchased the property. In 2023, the buildings were demolished, and Block C has remained vacant, except for use in 2024 to present as a staging area for equipment and materials being used for construction of the mixed-use building on Block I.

Block D: By 1890, three dwellings and a wood house occupied the eastern half of Block D. By 1905, one of the dwellings in the southeast corner of the block had been replaced by wagon stock sheds for the Bain Wagon Company. By 1911, the stock sheds had been expanded north and a road cut diagonally across the northeast corner of the block. A concrete warehouse occupied the northeast corner. Additional lumber sheds replaced the dwellings in the northwest corner of the block by 1918. By 1926, Bain had ended production in Kenosha, and by the 1930s the factory buildings had been demolished. By 1949, a freight house with attached waiting room occupied the eastern half of the block. A small portion of a furniture store extended onto the northern portion of the modern-day block. By 1969, the freight house was replaced by a smaller office building. The office buildings remain on the block but are privately owned and not included as part of the site for the cleanup grant.

6.c. Environmental Concerns

Multiple phases of due diligence have been completed at the Site and have confirmed the presence of hazardous substances including polynuclear aromatic hydrocarbons (PAHs), metals, volatile organic compounds (VOCs), and methane, at concentrations greater than applicable State of Wisconsin health-

Application by the City of Kenosha for an FY2026 EPA Brownfield Cleanup Grant for the Kenosha Harbor District Project – Blocks A-D, Kenosha, Wisconsin

based soil, and/or groundwater, or vapor or other risk standards. A summary of the contamination confirmed at the Site from completed assessments and investigation is as follows:

Soil: Soil investigation work confirmed the presence of VOCs, PAHs, and RCRA metals, primarily arsenic and lead, throughout the Project parcels at concentrations greater than health-based ch. 700 Wisconsin Administrative Code (WAC) residual contaminant levels (RCLs) for direct contact (DC) at non-industrial properties and/or of soil impacts to groundwater. Historic fill materials, all of which are impacted to some degree, are present throughout the site to varying depths.

Groundwater: Scattered exceedances of NR140 groundwater standards for select VOCs and PAHs are present at the Site but are not anticipated to require specific remedial measures.

Methane/Soil Vapor Impacts: Elevated concentrations of methane and select VOCs are believed to be present throughout the Site, due to the presence of peat or organic fill beneath extension portions of the Site (in particular, the areas on Blocks B and C formerly occupied by Pike Creek and adjoining fill-in wetland areas), and impacts associated with a former coal gas site on an adjacent block that is part of the larger Kenosha Redevelopment Area (Block F).

Remediation of these impacts is necessary to enable the redevelopment of the Site for residential, commercial, and public use.

7. Brownfields Site Definition

The Site is real property, for which reuse is significantly complicated by the presence of hazardous constituents associated with previous uses and activities. Per CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and “Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k),” the Site is not: (a) listed or proposed for listing on the National Priorities List; (b) subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; or (c) subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

Phase II ESA’s have been completed on all four blocks and parcels included within the Cleanup Grant Site, as summarized on the table below.

Block	Summary of Phase II ESAs
A	Initial environmental and geotechnical studies were completed for Block A by Giles Engineering Associates on behalf of the City in 2005. In 2020, a Phase II ESA report was completed for the parcel on behalf of the City by AECOM. The report was completed by AECOM under contract to the Wisconsin Department of Natural Resources (WDNR) using funding provided to the WDNR by the EPA and was dated 2/25/2020.
B	A Phase II ESA for Block B was completed by Terracon Consultants, Inc. on behalf of the developer in 2023. The report was dated 11/20/2023. A combined NR716 Site Investigation (SI) Report and Remedial Action Options Report for Block B was completed by Stantec on 12/2/2025

Application by the City of Kenosha for an FY2026 EPA Brownfield Cleanup Grant for the
Kenosha Harbor District Project – Blocks A-D, Kenosha, Wisconsin

	and submitted to the WDNR on 12/19/2025. The SI Report included data for soil, groundwater, and/or vapor samples collected by Stantec from 22 soil borings and 11 wells or piezometers.
C-D	A Phase II ESA was completed for City-owned parcels within Blocks C-D by Stantec Consulting Services Inc. in 2024. The report was dated 11/12/2024.

9. Site Characterization

Attachment B provides a letter from the WDNR dated January 27, 2026, affirming that: a) the City has requested (or will request) oversight of cleanup activities for the Site by the WDNR, b) that the Site is eligible for oversight by WDNR as part of cleanup activities that will be completed in accordance with Wisconsin’s Chapter NR700 Rule Series, and c) that WDNR concurs that subsurface impacts are sufficiently defined for remediation work to begin.

In the event that additional characterization work is unexpectedly required, the City affirms that it will complete additional assessment activities on or before June 15, 2026, necessary for remediation work to begin. The City has funding in place to complete this assessment work, if required.

10. Enforcement or Other Actions

There are no ongoing or anticipated enforcement actions at the Site.

11. Sites Requiring Property-Specific Determinations

The City affirms that the Site does not need a property-specific determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

As described in the response to Criterion No. 6, contamination at the Site is overwhelmingly associated with hazardous substances, and no distinct areas of petroleum contamination have been identified that are linked to use of former petroleum ASTs or USTs. Therefore, per the guidelines, responses are provided below only for information requested under “12.a” for hazardous substance sites.

12.a. Property Ownership Eligibility – Hazardous Substance Sites

The City asserts that for all twelve parcels within the Cleanup Grant Site, the City either has exemption from CERCLA as a bona fide prospective purchaser, or is eligible from funding as a result of having acquired the parcels prior to 1/11/2002 and not having caused or contributed to any of the releases or threatened releases of hazardous substances on the parcels. Therefore, responses are provided below to 12.a.ii and 12.a.iii, as appropriate.

12.a.ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability

12.a.ii(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

Nine of the parcels within the Cleanup Grant Site were acquired by the City prior to 1/11/2002, as summarized on the table below.

Application by the City of Kenosha for an FY2026 EPA Brownfield Cleanup Grant for the
Kenosha Harbor District Project – Blocks A-D, Kenosha, Wisconsin

Block	#	Tax Identification #	Street Address	Document No.	Area (acres)	Date of Acquisition	Notes
A	1	12-223-31-401-101	5 th Avenue	1165695	1.60	Pre-1999	See note 1
B	2	12-223-31-402-003	5403 7 th Avenue	1165695	0.46	Pre-1999	See note 2
	3	12-223-31-404-001	5413 7 th Avenue	1022304	0.29	4/29/1996	
	4	12-223-31-404-004	55 th Street	1022304	0.05	4/29/1996	
	5	12-223-31-404-005	55 th Street	1022304	0.05	4/29/1996	
	6	12-223-31-404-006	55 th Street	1022304	0.05	4/29/1996	
	7	12-223-31-404-007	55 th Street	1021783	0.41	4/29/1996	
	C	9	12-223-31-402-004	54 th Street	1165695	0.22	Pre-1999
D	12	12-223-31-426-017	54 th Street	1417670	0.42	Pre-1999	See note 2

Note 1: Although the exact date on which Parcel #A1 was acquired is uncertain, the parcel was acquired by the City circa 1990-91 as part of the purchase of the former AMC Lakefront Plant.

Note 2: Although the exact date(s) on which Parcels #B2, C9, and D12 were acquired is unconfirmed, the parcels were each acquired prior to 11/18/1998 – the date for a survey map that shows all of the parcels as being under City ownership at that time.

12.a.ii(1)(a/b) Circumstances Under Which the Property was Acquired and Acquisition Dates

Acquisition dates are listed in the table above or within the footnotes for the table. It is believed that all parcels were acquired by the City through purchases that were made for the purpose of providing public parking and/or assembling land for future redevelopment.

12.a.ii(1)(c/d/e) Affirmations

All disposal of hazardous substances at the Site occurred prior to City acquisition of the Site. The City affirms that it did not cause or contribute to any releases of hazardous substances at the Site, and also that it did not, at any time, arrange for the disposal of hazardous substances at the Site or transport hazardous substances to the Site.

12.a.iii. Landowner Protections from CERCLA Liability

12.a.iii(1) Bona Fide Prospective Purchaser Liability Protection

12.a.iii(1)(a) Information on the Property Acquisition

As previously detailed, nine of the parcels within the Site were acquired by the City prior to January 11, 2002. The remaining three parcels within the Site were acquired by the City in 2019. Information on the acquisition of these parcels is summarized on the table below. The type of ownership for all parcels is fee simple. The City has no known familial, contractual, corporate, or financial relationships or affiliations with any prior owner or operator of these parcels, or any potential responsible parties.

Block	#	Tax Identification #	Street Address	Document #	Area (acres)	Acquisition Date
C	8	12-223-31-403-001	5407 8 th Avenue	1837357	0.53	2/26/2019
	10	12-223-31-403-008	7 th Avenue	1837357	0.07	2/26/2019
	11	12-223-31-403-009	700 55 th Street	1837357	0.61	2/26/2019

12.a.iii(1)(b) Pre-Purchase Inquiry

Application by the City of Kenosha for an FY2026 EPA Brownfield Cleanup Grant for the Kenosha Harbor District Project – Blocks A-D, Kenosha, Wisconsin

A Phase I ESA was completed by AECOM for Parcels C8, C10, and C11 in January 2019 on behalf of the City. The Phase I ESA was prepared per the All-Appropriate Inquiries rule in accordance with ASTM Standard E1527-13, and completed by staff who meet the definition of an Environmental Professional as defined in 312.10 of 40 CFR Part 312 and ASTM E1527-21. The three parcels were subsequently acquired by the City on February 29, 2019.

12.a.iii(1)(c) Timing and/or Contribution toward Hazardous Substances Disposal

The three parcels were contaminated as a result of historic industrial and commercial uses that date back to the 1850s. All disposal of hazardous substances occurred prior to acquisition by the City. The City did not cause or contribute to any releases of hazardous substances at these parcels. Furthermore, the City has not at any time arranged for the disposal of hazardous substances at the parcels or transported hazardous substances to the Site.

12.a.iii(1)(d) Post-Acquisition Uses

Several commercial and community services entities leased the former buildings on Block C until 2023 when the buildings were demolished, and this portion of the Site was left vacant in anticipation of development. Beginning in 2024 and continuing to present, the parcels within Block C have been used as a staging area for equipment, materials and contractors constructing a mixed-use building on Block I.

12.a.iii(1)(e) Continuing Obligations

No contamination has been identified on the three parcels within the Site for which continuing obligations would apply.

The City affirms its commitment to: (i) comply with all land use restrictions and institutional controls; (ii) assist and cooperate with those performing the cleanup 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.

12.b. Property Ownership Eligibility – Petroleum Sites

Not applicable.

13. Cleanup Authority and Oversight Structure

13.a. Cleanup Oversight

Soil remediation, vapor mitigation, and any other cleanup activities funded through the EPA Cleanup Grant will be conducted in accordance with the requirements specified in the Wisconsin Chapter NR700 rule series. For each block, this may include submittal of Site Investigation Reports, Remedial Action Option Reports, and Interim or Remedial Action Plans to the WDNR for review/approval. Case closure from the WDNR will be pursued for all parcels, which will include review by WDNR of all cleanup activities and their sufficiency to address threats to human health and the environment

The City will rely on outside consultants to be procured in accordance with procurement provisions of 2 CFR §§ 200.317 through 200.326 to provide necessary oversight and technical expertise necessary for cleanup.

Application by the City of Kenosha for an FY2026 EPA Brownfield Cleanup Grant for the Kenosha Harbor District Project – Blocks A-D, Kenosha, Wisconsin

13.b. Access to Neighboring Properties (if required)

Not applicable. No cleanup activities will be performed using EPA funds that will require access to neighboring properties not owned by the City or developer. The rights-of-way directly bordering the Site are owned by the City, and can be accessed if necessary.

14. Community Notification

14.a. Draft Analysis of Brownfield Cleanup Alternatives

The draft ABCA and application narrative were made available for public review at a public meeting hosted by the City on January 20, 2026. No comments were received from the public. A copy of the draft ABCA is provided as **Attachment C1**.

14.b. Community Notification Ad

A notice for the public meeting was placed on the City’s website on January 8, 2026. Copies of the community notification documentation are provided as **Attachment C2**.

14.c. Public Meeting

A public meeting was held on January 20, 2026, from 4-4:30 pm in Room 308 of the Kenosha Municipal Building at 625 52nd Street, which is located one-block north of the Site. Interested parties had the option to attend the meeting using a call-in number or virtually using a Google Meet link provided in the community notification ad. A meeting summary is provided as **Attachment C3**. No members of the public attended the meeting either in person or virtually, and no comments were received by the City following the meeting.

14.d. Submission of Community Notification Documents

The following required community notification documents are provided as attachments:

Attachment	Description
C1	A copy of the draft ABCA.
C2	Documentation of community notification to the public and solicitation for comments on the proposal.
C3	A meeting summary, including a copy of the presentation made.

15. Contractors and Subrecipients

The City has not retained a contractor or consultant for work that will be paid for by the grant if awarded. There are no subrecipients named in the grant application.

THRESHOLD CRITERIA – ATTACHMENT B

ENVIRONMENTAL AGENCY LETTER



January 27, 2026

Abigail Huff
Community Development Specialist
625 - 52nd Street, Room 308
Kenosha, WI 53140
Via Email Mail Only to ahuff@kenosha.org

Subject: State Acknowledgement Letter for City of Kenosha
FY26 EPA Brownfield Cleanup Grant

Dear Abigail Huff,

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

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

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

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

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(s) 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 does not plan to enroll 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 January 14, 2026, the applicant stated the following:

Site investigation activities have not yet been completed nor has WDNR yet approved a Site Investigation under Wis. Admin. Code ch. NR 716. The City received state assessment funding in 2025 to complete additional investigation work as needed. However, subsurface impacts in the redevelopment area appear sufficiently known to implement the selected remedial alternative. It is acknowledged that post construction

monitoring of sub-slab vapor and groundwater will likely be required, but the scope is not yet determined. In addition, a formal remediation documentation report will be prepared following construction of the final engineered barrier surface(s). We affirm that sufficient level of site characterization from the environmental site assessment performed on site will be achieved by June 15, 2026, for the remediation work to begin on the site. As such, the proposed cleanup can begin as soon as USEPA awards funding.

Waste characterization sampling is warranted to establish the necessary waste profiles to manage impacted soils. This work is likely to take place during the Winter 2026, allowing the Remedial Action Plan and Material Management Plan to be developed in early-Spring 2026.

With the exception of Block B, site investigation reports or remedial action plans have not been submitted to the DNR for approval, and the DNR has not approved the ongoing environmental investigations at these sites as being complete. However, the information that is available about environmental conditions at these sites is sufficient to begin remedial activities.

Sincerely,



Christine T. Sieger, Program Director
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

Attachment:
Request dated January 14, 2026

cc:
Paul Grittner, DNR SER – Paul.Grittner@wisconsin.gov
David Hanson, DNR SER – David.Hanson@wisconsin.gov
Margaret Brunette, DNR SER – Margaret.Brunette@wisconsin.gov
Katarina Schulz, Stantec – Katarina.Schulz@stantec.com