



City of Brillion
201 N. Main Street
Brillion, WI 54110
Phone (920) 756-2250
Fax (920) 756-2351

RE: Grant Proposal by the City of Brillion for a Brownfield Multipurpose Grant for Redevelopment Area 5 of the Brillion Iron Works Redevelopment

The City of Brillion, Wisconsin (City) is pleased to submit the enclosed proposal to the United States Environmental Protection Agency (USEPA) for a multipurpose grant for \$1,000,000 as part of the USEPA Fiscal Year (FY) 2026 Brownfield Grant Competition.

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

1. Applicant Identification

- a. Name of Applicant: City of Brillion, Wisconsin
- b. Address of Applicant: 201 N. Main Street; Brillion, WI 54110

2. URL: *https://www.brillionwi.gov/*

3. Funding Requested

- a. Grant Type: Multipurpose
- b. Federal Funds Requested: \$1,000,000

4. Location

- a. City: City of Brillion
- b. County: Calumet County
- c. State: State of Wisconsin

5. Property Information:

- a. Property Name: Redevelopment Area 5 of the Brillion Iron Works Redevelopment
- b. Property Address: 300 Park Avenue; Brillion, Wisconsin 54110

6. Contacts

- a. Project Director - City of Brillion:
Name: Heather Gilbertson, Administrator Clerk/Treasurer
Phone: 920-756-2250
Email address: clerk@brillionwi.gov
Mailing address: 201 N. Main Street, Brillion, WI 54110

- b. Chief Executive/Highest Ranking Elected City Official
 Name: Mike Smith, Mayor of the City of Brillion
 Phone: 920-756-2250
 Email address: [REDACTED]
 Mailing Address: 201 N. Main Street; Brillion, WI 54110

7. General population (2022 US Census Bureau Estimate)

- a. City of Brillion = 3,375
 (Source: policymap.com, with subscription)

8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	Page 1 & Page 3 (Table 1)
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Page 2
The proposed site(s) is in a federally designated flood plain.	Page 2
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Page 4
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Page 3
At least 20% of the overall project budget will be spent on eligible/area-wide planning activities, as described in Section 3.A.(2), for the priority site(s) within the target area.	
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

9. Letter from the State or Tribal Environmental Authority
 Included in Attachment A1.

10. Releasing Copies of Applications
 Not Applicable



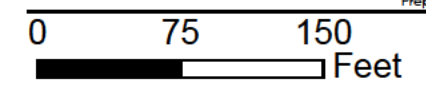
Figure No.

1

Priority Sites within the Target Area

Target Brownfield
 Brillion Iron Works Redevelopment
 Brillion, Wisconsin 54110

Prepared by JLH on 1/26/2026
 Project: 193711828



Legend

- 1)BIW Former Plant 2; 7.87 acres
- 2)Industrial Parking Lot; 2.25 acres
- 3)Mills Pond; 2.56 acres

Priority Sites
 (Redevelopment Area 5)

Notes

- 1. Coordinate System: NAD 1983 HARN WISCRS Calumet County Feet
- 2. Orthophotograph: Calumet County, 2021.





January 16, 2025

Heather Gilbertson
City of Brillion
633 Lee Avenue
Brillion, WI 54110
Via Email Mail Only to clerk@brillionwi.gov

Subject: State Acknowledgement Letter for City of Brillion
FY26 EPA Brownfield Multipurpose Grant

Dear Heather Gilbertson,

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

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

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

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

Sincerely,

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

Attachment:
Request dated December 18, 2025

cc:
Bill Honea, Stantec – Bill.Honea@stantec.com
Kevin McKnight, DNR NER – Kevin.McKnight@wisconsin.gov
Tauren Beggs, DNR NER – Tauren.Beggs@wisconsin.gov
Denise Danelski, DNR NER – Denise.Danelski@wisconsin.gov

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION:

Target Area and Brownfields: 1.a. Overview of Brownfield Challenges and Description of Target Area:

“Small City, Big Heart”. Nestled between Lake Michigan and Lake Winnebago in Calumet County, the City of Brillion (“our City”) tells a long and storied history of providing a unique combination of hometown warmth, community partnership, emphasis of science, technology, engineering, and math (STEM) education for students of all ages and backgrounds, bountiful recreation, and industrial opportunity. Our small City and the surrounding region were first settled by European farmers and entrepreneurs in the late 1850s, who carved farmland out of the wilderness and took interest in our area’s abundant natural resources. During the 1870s the railroad became our City’s key artery to the outside world, fueling industry, commerce and residential growth. Our City became a major grain supplier for markets in larger surrounding cities, and by 1893 the local quarry produced 1,000 barrels of Wisconsin white lime every day, making it the largest limestone facility in the country at that time¹. With ease of rail access and an abundant workforce, the 20th century saw a boom of large-scale industrial development in Block Group 550150201002 (BG-2), the historic industrial block of Census Tract CT-55015020100 (CT-201). It was here in late 19th century that the *Brillion Iron Works* foundry laid down its roots across 145 acres, the **Target Area** of this application within BG-2 & CT-201. Over its 120-year tenure, Brillion Iron Works became one of the largest and most versatile iron foundries in the country, producing iron products across heavy truck, mining, agriculture and industrial markets; it was a long-standing economic anchor for our community and one of the area’s largest employers. Due to a severe downturn in the agricultural and industrial markets it served, Brillion Iron Works closed its doors in 2016, leaving only memories of a once-vibrant past and burdening our community with substantial loss and blight. The failing industrial sector and subsequent closure of local supporting commercial operations created 172 potential brownfields throughout our City, the largest by far being the former Brillion Iron Works. As our industrial operations faltered, so too did our vitality, as evidenced by the **loss of half of our population** in the Target Area since the collapse of the foundry in 2016 in search of work, leaving those who remained behind with a failing economy and a **45% increase in poverty rate over less than a decade**². The adjacency of the Target Area to downtown and our City parkland makes redevelopment especially attractive to our community. However, while we certainly have the ambition and community solidarity to rekindle these underutilized and blighted parcels, we do not have the financial resources needed to address the burden of brownfields without support. Funding from the US Environmental Protection Agency (EPA) brownfields program is vital for achieving our community revitalization goals, restoring economic vitality, and mitigating potential health risks from brownfields. The greatest project needs to be addressed by redevelopment of priority brownfields with the aid of this multipurpose grant are 1) increased residential/worker housing options to support rebuilding our City’s industrial sector and adjacent downtown commercial district, and 2) expanding public access to trails and greenspace in the Target Area. The assessment, cleanup and redevelopment in the Target Area is consistent with community needs and will bring catalytic improvements to the quality of life in our City to address significant blight, poor economic conditions, and welfare.

1.b. Description of the Priority Brownfield Site(s):

As part of prior EPA-awarded cleanup grants and revitalization efforts, a comprehensive inventory of over 172 brownfield sites has been identified within our City, many of which are concentrated in the Target Area. At the height of operations, Brillion Iron Works operated four foundry buildings, employing over 1,000 people and producing up to 1,175 tons of grey ductile iron per day³. Brillion Iron Works’ abrupt closure in 2016 sent massive shockwaves through our City, Target Area, and surrounding communities. Supporting industries and our once-vibrant downtown commercial district collapsed virtually overnight, and 145 acres of land sat vacant and in disrepair. Our City acquired the Target Brownfield in 2018 and entered into a redevelopment agreement with Brillion Works, LLC (BW, LLC; herein the “Developer”) with a vision to breathe new life into this blighted property. With the help of previous grant funding from EPA, initial assessment and cleanup activities for several Target Area brownfields have resulted in four successful redevelopments to date, including an office complex, a healthcare clinic, a childcare facility, and a manufacturing facility; however, due to long-time industrial use and complex environmental history, additional assessment and cleanup is needed for other brownfields within the Target Area to facilitate future reuse. Three of these brownfields have been identified as **Priority Sites, which will be the primary focus of this grant**. These Priority Sites are located in the east-central area known as Redevelopment Area 5 of the Brillion Iron Works, together totaling 12.68 contiguous acres of the greater 145-acre Target Area. **Table 1** details the Priority Sites with known or perceived environmental issues, which have been prioritized based on our community needs.

¹ https://www.calumetcountyhistoricalsociety.org/index_files/Page943.htm

² Data from <https://www.policymap.com/newmaps/e/www>

³ https://www.calumetcountyhistoricalsociety.org/index_files/Page943.htm

Target Area=Brillion Iron Works (145-ac.), in Block Group 2, Census Tract 201; BAC = Brownfield Advisory Committee; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; [blue text](#) = hyperlinks to source material

Table 1: Priority Sites
<p>Priority Site 1. Former Plant 2; 7.96 acres</p> <p>First constructed in 1974, Brillion Iron Works' Former Plant 2 spanned over 163,000 square feet (ft²) and focused on smelting and casting iron. In 2020, the plant was razed, leaving only the concrete foundation in its wake. However, over the course of the plant's operation, numerous spills involving compressor fluid, hydraulic oil, and fuel oil occurred. Power for Former Plant 2 was supplied by six onsite transformers. Prior to being decommissioned, Former Plant 2 was a generator of hazardous waste with a history of violations for improper waste management. Soil contamination (heavy metals, VOCs, and PAHs) have been documented at the site, with the potential for PCB contamination from the former transformers onsite. Priority Site 1 is targeted for multi-family residential redevelopment to further assist in our community's need for affordable housing. It is imperative to perform additional assessment, cleanup planning, and remediation to identify/address any remaining environmental concerns at Former Plant 2 to support redevelopment of safe and healthy housing for our community.</p>
<p>Priority Site 2. Industrial Parking Lot; 2.14 acres</p> <p>South adjacent to Former Plant 2, the Industrial Parking Lot was utilized as a corridor for semi-trucks parking and general transportation between foundry buildings since the 1970s. An oil storage building containing hydraulic and compressor oil for the foundries was present in the northwest portion of the site, until it was razed with the other foundry buildings in 2020. Soil contamination (heavy metals, PAHs, and VOCs) has been documented at the site. Priority Site 2 is targeted as multi-family residential redevelopment. Together, Priority Site 1 and Priority Site 2 will assist in closing the affordable housing gap our community is facing.</p>
<p>Priority Site 3. Mills Pond; 2.58 acres</p> <p>Mills Pond was constructed in 2012 by Brillion Iron Works for stormwater management of the Target Area and is located is a designated floodplain. Although only intended for stormwater, sheens were regularly observed on the pond surface from releases at Former Plant 2 (Priority Site 1), which included hydraulic oil and compressor fluid. Sediment and surface water contamination (heavy metals, PAHs, oil, and grease) has been documented at the site. In addition to the pond, sheens have also been observed in the adjoining Mills Creek from releases at Priority Site 3. Mills Creek discharges to the Brillion State Wildlife Area (a 4,800-acre wetland), which then drains into the Manitowoc River and Lake Michigan. Priority Site 3 is targeted for cleanup to assist in preserving our wonderful natural amenities and mitigating flood risk, and by creating a natural habitat while acting as a stormwater pond for Priority Site 1 and Priority Site 2.</p>

All prior structures were removed by 2022. Now unoccupied, the Priority Sites represent the greatest potential to catalyze immediate economic investment in our community. Each Priority Site has been identified in the *2023 Brillion Works Reuse Plan*, and proposed residential redevelopment aligns with community priorities to increasing housing options in our City. However, soil and groundwater are known to be impacted by heavy metals, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs) and polychlorinated biphenyls (PCBs) from foundry operations, bulk petroleum storage, rail road spurs, and from historic foundry sand/fill. All sites (priority and others) located in the Target Area that require remediation are owned by the City. However, we are not responsible for the historical contamination based on the history of the Target Area. Without cleanup, these contaminants jeopardize community health, especially sensitive populations in the Target Area who have elevated risks of developing severe health conditions from exposure. The risks to human health from identified contaminants include birth defects, cancer (liver, brain, lung), and nervous system and reproductive system damage.⁴

1.c. Identifying Additional Sites:

Given the vast and complicated industrial history of the sites described above, all available funds are anticipated to be consumed by environmental assessment, cleanup and/or reuse activities for the three Priority Sites. However, if funds remain after addressing these Priority Sites, we will utilize the comprehensive City brownfield site inventory developed using funds from the FY19 EPA Cleanup grant. The inventory identified over 172 brownfields sites in our City, many of which are concentrated in the Target Area. We will use this inventory to identify and rank additional sites within the Target Area by the following criteria: 1) confirming the site is **eligible** for assessment/cleanup based on EPA requirements; 2) site significance relative to achieving our revitalization approach; 3) marketability of the site and the potential for redevelopment emphasizing multi-family residential, mixed-use development and/or benefit to disadvantaged community members; 4) extent and/or perception of contamination threatening public and/or environmental health; 5) the degree to which assessment and/or cleanup would encourage redevelopment/reuse of the site; and 6) potential positive impact for the community as a result of site assessment, cleanup and/or reuse.

⁴ Health impacts per <https://www.cdc.gov/TSP/ToxFAQs/ToxFAQsLanding.aspx>

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Revitalization of the Target Area: 1.d. Overall Plan for Revitalization Utilizing funds from a FY19 EPA Brownfield Cleanup Grant awarded to our City in 2019, the *2023 Brillion Works Reuse Plan* (“**Revitalization Plan**”) was created specifically for the Target Area to describe the revitalization approach for Brillion Iron Works. The Revitalization Plan was created as a joint effort between our City and the Developer to establish a path and implementation steps for redevelopment by synthesizing the environmental studies performed to date, site conditions, environmental conditions and remediation, current market conditions, and current/planned development. We engaged with the public during an open house to gain insight into community needs that the project could meet. Responses indicated that a variety of new housing was a key priority, with other desires including additional retail, walking trails and community greenspace. With incorporation of this feedback, revitalization of the Target Area as a whole is geared towards linking Brillion Iron Works to downtown (only one block away), creating a gateway to connect residents with trails and retail amenities. As part of the Target Area, all three Priority Sites were included in the Revitalization Plan. **Priority Site 1** is targeted for multi-family residential housing, creating a cohesive new neighborhood amongst other proposed residential redevelopments and the opportunities for shared residential amenities. **Priority Site 2** is also targeted for multi-family residential housing, with trail connections directly linking the residential complex to the south-adjacent Horn Park. **Priority Site 3** will remain a pond following cleanup, but one that the community can enjoy as a destination space. New trails will also encourage recreation by residents and visitors. The assessment, cleanup and subsequent reuse(s) for the Target Area (if funded by this grant) will lead to economic growth as it will encourage development that is consistent with and complementary to planned land uses and encourage development that will meet the needs of the local community per our Revitalization Plan.

The environmental assessment, cleanup, and redevelopment of the Target Area for multi-family residential reuse and to support neighboring retail amenities is in direct alignment our community priorities and needs identified in the *Calumet County 2045 Comprehensive Plan - City of Brillion* (“**City Plans**”), including our top two objectives for our City: 1) promote economic development and encourage long-term investment in our community; and 2) increase housing supply and housing types while reducing housing costs. The City Plans were developed with input from our community members during public meetings, charettes, and during the County Fair. Consistent with the Revitalization Plan, residents indicated that there is a severe lack of housing, significantly impacting our underserved community. Between the lack of quality and number of homes available, the multi-family residential development at the Target Area *will* help to catalyze infrastructure investment and commercial growth our community so desperately needs. In broader context, this residential redevelopment opportunity for our Priority Sites will leverage ~\$66,000,000 in private development and provide **116 new homes** (housing units). Cleanup and redevelopment of the Target Area for residential reuse with new trail access will improve welfare conditions by 1) increasing healthy housing, 2) decreasing contaminant source areas, and 3) making the surrounding neighborhoods safe and walkable.

1.e. Outcomes and Benefits of Overall Plan for Revitalization: The Developer has executed a development agreement with our City and has completed **four** very successful redevelopment projects in other portions of the Target Area that have generated 111 full-time jobs since 2020: 1) a multi-story office complex (\$3,378,486 private investment), 2) a next-generation healthcare clinic (\$5,600,000 private investment), 3) a childcare facility (\$3,510,119 private investment), 4) and an industrial research and design manufacturing facility (\$10,950,000 private investment). Furthermore, two monumental redevelopment projects are currently underway in separate portions of the Target Area that includes the construction of a 70-unit modern, Americans with Disabilities Act (ADA)-compliant multi-family apartment complex (~\$10,000,000 private investment), and the realignment of Spring Creek for significant flood mitigation (\$3,000,000 private and federal investment). Portions of the Target Area (including Priority Site 3) are currently in a *federally designated floodplain* from routine flooding of Mill Creek and Spring Creek (both adjacent to the Priority Site 3); the realignment of Spring Creek currently underway will expand flood storage capacity to mitigate flooding and subsequently remove portions of the Target Area from the floodplain. The resulting greenspace following redevelopment will allow for expansion of flood storage, mitigating flooding risk while providing expanded safe/healthy recreation opportunities for future residents. This astonishing list of accomplishments between our City and the Developer illuminates our drive to continue transforming Target Area brownfields into assets to our dedicated community. Our next steps for redevelopment of the Priority Sites in the Target Area are in direct alignment with the reuse strategies outlined in the *Revitalization Plans* to provide workforce housing and additional greenspace.

Situated only 25 miles west of Lake Michigan, extreme weather and flooding events are the biggest natural hazards likely to impact our City. Per the Wisconsin Department of Natural Resources (WDNR), the state has received a record-breaking amount of precipitation over the past several years, from rainfall events that are occurring with intensity and frequency⁵. Residents and farmers in our community have experienced this first-hand from repeated flooding of Spring Creek and the North Branch of the Manitowoc River (a major tributary to Lake Michigan). In addition to the Spring Creek alignment project, the incorporation of green space (Priority Site 3) will stabilize soils and control erosion during heavy rainfall events. These approaches will improve long term local resilience to extreme storm and flooding events. Planned multi-family residential housing will incorporate energy efficiency into the building and mechanical designs, with the goal of having the buildings qualify for Leadership in Energy and Environmental Design (LEED) status. A recent study found that buildings constructed to LEED standard contributed to 50% fewer greenhouse gas compared to conventional construction⁶. Furthermore, by building to the LEED standard, these new homes will assist home dweller in the ever-growing cost of utilities by a 17.3% decrease (or \$1.39 savings per square foot)⁷.

Strategy for Leveraging Resources: 1.f. Resources Needed for Site Reuse:

We are experienced at leveraging public and private funding to support redevelopment, including specific pledged and leveraged funding for remediation and planned reuse of Priority Sites. To date, our City and Developer have invested **\$31,500,00** in local (\$3.7MM) and private (\$27.8MM) funds to demolish the former foundry buildings and perform environmental investigations and remediation at Target Area brownfields. Environmental assessment, cleanup, and redevelopment efforts in the Target Area to date are already leveraging funding and support. Environmental assessment and cleanup completed using this EPA multipurpose grant will strengthen our existing leveraging power by removing environmental barriers to redevelopment and advancing the Target Area toward shovel-ready development status, attracting additional funding and investment to support assessment, remediation and reuse for our Priority Sites. Our City is eligible for and will pursue the key funding resources in **Table 2**. Our City will also support the Developer in pursuing funding, where eligible.

Table 2: Funding Resources to Leverage for Site Reuse	
Name of Resource: Insurance Recovery	Status: Eligible; Unsecured
Additional Details: The City is searching old general liability insurance policies issued to a prior operator to confirm if insurance recovery could fund Remediation at the Target Property.	
Name of Resource: Wisconsin Economic Development Corporation (WEDC)	Status: Eligible; Unsecured
Additional Details: A \$250,000 grant is earmarked from the WEDC Idle Site Redevelopment Program to ignite cleanup and reuse of prior idle industrial sites to become economic developments for our community.	
Name of Resource: BW, LLC (Developer)	Status: Secured (Attachment A1)
Additional Details: The Developer is in the process of securing the construction funding stack between \$15,000,000 and \$20,000,000 for the future multi-family and workforce housing residential buildings.	
Name of Resource: Wisconsin Department of Transportation (WisDOT)	Status: Secured
Additional Details: A \$3,372,466 grant is secured from the WisDOT Transportation Economic Assistance (TEA) program for funding to build new roads at the Target Area.	
Name of Resource: City of Brillion Environmental TID	Status: Eligible; Applied
Additional Details: The City established an Environmental TID to facilitate cleanup, development, and reuse(s) in the Target Area.	

1.g. Use of Existing Infrastructure:

As a former foundry, significant electrical and natural gas infrastructure exists at the Target Property and remains viable for use by future redevelopment. For example, the local electrical utility installed a **\$14,000,000** substation in 2016 to supply power to the former foundry. This substation has sufficient capacity to serve the future multi-family housing proposed for Priority Sites 1 & 2, in addition to all the proposed reuses at the greater Target Area. Installation of a new street network is a key component to the Revitalization Plan for the Target Area. As noted in **Table 2**, the WisDOT-TEA **\$3,372,446** secured grant to fund the construction of **3 miles of new road infrastructure** and facilitate the **installation of new water and sewer utilities** beneath the new roadways to satisfy the needs of the redevelopment and generate additional utility revenue.

⁵ <https://dnr.wisconsin.gov/topic/HighWater>

⁶ <https://escholarship.org/uc/item/935461rm>

⁷ <https://ora-cfo.dc.gov/blog/leed-certified-buildings-lower-operating-expenses-commands-higher-rents-residential-units>

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2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT:

Community Need: 2.a. The Community’s Need for Funding

This grant will meet the needs of our community that has the inability to draw on other sources of local funding to adequately conduct cleanup due to our small population and low income, which is attributed to job losses and exacerbated

Table 3. Indication of Community Need ²	Target Area		City of Brillion	Calumet County	State of WI	US
	BG-2	CT-201				
Population (change since 2016)	682 (-50%)	5,052 (+6%)	3,307 (+6%)	52,626 (+6%)	5.9M (+2%)	332M (+3%)
Percent Poverty Rate (change since 2016)	<i>data not available</i>	10% (+45%)	13% (+97%)	6% (-1%)	11% (-11%)	12% (-11%)
Median Household Income (change since 2016)	\$72,955 (+12%)	\$77,440 (+21%)	\$67,122 (+3%)	\$87,700 (+21%)	\$75,670 (+28%)	\$78,538 (+30%)
Single Parent Families in Poverty	0%	51%	56%	27%	24%	28%
Percent Housing for Sale/Rent	0.0%	1.1%	1.6%	1.9%	1.8%	2.4%
High School Graduate (only)	58%	45%	45%	30%	30%	26%
Bachelor’s Degree or Higher	17%	19%	20%	33%	22%	35%

Bold indicates worse conditions than the County; **RED** is worse than all County, WI & US Comparisons.

limited state/local funding. Our City’s annual budget for 2025 was \$3.34MM. At an estimated cost of \$22,000 per acre of redevelopment, revitalization of the 145-acre Target Area would comprise almost the entirety of our annual budget. Further, these municipal funds are restricted by law for designated purposes, and lenders would not loan for remediation without egregious interest rates/terms, creating the inability for our City to fund assessment, cleanup and/or redevelopment at this scale. Key indicators of disproportionately impacted populations compared to the County, State and US are summarized on **Table 3** and reflect a steep decline in economic conditions following the closure of Brillion Iron Works, the former economic powerhouse of our City. The Target Area **lost half of its population** following the collapse of the foundry in 2016, and those that remain have been met with a **45% increase in poverty rate**, with **over half of single parents and their children living in poverty** (more than double the rate of the State), which is why this area is critical for redevelopment to address our community need. Together these factors indicate a much lower than average discretionary income, which has resulted in less spending and decreased economic growth for the community. Despite the economic decline, minority populations are increasing. Since 2016, our Hispanic & Latino community has grown from 0.4% of BG-2 residents, to 5% today². Minority populations are expected to keep growing due to a relatively sizeable percentage of young persons and higher rates of immigration into our community.

Small Population Size. A limiting economic factor is our City’s lack of “entitlement status”; therefore, we do not receive an annual allocation of Community Development Block Grants funds that could be a key source of cleanup funding. With a population of only 3,307 and an annual budget of only \$3.34MM (2025), our community cannot reasonably raise capital to self-fund necessary cleanup at the Target Area.

Loss of Jobs & Income. As a community, we have experienced many economic challenges over recent decades associated with globalization and its impact on the manufacturing sector, which previously provided the foundation for our City’s prosperity and main source of local jobs. Rising global competitiveness and offshoring to reduce labor costs resulted in major job losses. When Brillion Iron Works closed, the initial economic impact was the immediate loss of **342 jobs**, accompanied by \$20,000,000⁸ in tax base and the loss of our largest public water user. Since 2012, the number of Target Area residents holding manufacturing jobs in BG-2 has **plummeted from 790, to 1** single resident². The regional economic impact (outside of the City) of closing the foundry was conservatively estimated at a \$27,000,000 loss.⁹ This loss in economic strength resulted in decreases in local tax revenue that would otherwise be available to assist the necessary assessment and cleanup at the Target Area.

Limited City/State Funding. To date, we have spent **\$3,500,000** (including fully spending the City’s \$2MM Environmental TID) on acquisition, asbestos abatement, building demolition, environmental assessment and cleanup work in the Target Area. For scale, this investment is **greater than the entire** City budget for a year; as such, our City simply does not have capacity to self-fund the necessary cleanup to facilitate the proposed reuse at the Target Area. Decreased property values due to the presence of brownfields in the Target Area undoubtedly reduces the fair market value of residential properties and local tax revenue that could be used to fund brownfield assessment and cleanup. Due to extraordinarily complicated eligibility thresholds, the project is not eligible for a grant under the State brownfield

⁸ <https://www.calumetcounty.org/AgendaCenter/ViewFile/Minutes/05112017-761>

⁹ <https://www.postcrescent.com/story/news/local/2016/10/04/outreach-iron-works-workers-full-swing/91470464/>

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cleanup program. As such, we desperately need funding through the EPA Brownfield program to address remaining industrial impacts in the Target Area to facilitate reuse as safe, quality multi-family residential homes (Priority Sites 1&2) and public greenspace (Priority Site 3).

2.b. Health or Welfare of Sensitive Populations:

There are **numerous** residential parcels within 1,000 feet of our Target Area brownfields. The Brillion Public Library, the Brillion Housing Authority, Horn Park, a daycare, and a health clinic are also located within 500 feet of the Target Area, which puts sensitive groups more susceptible to impacts at substantial risk from brownfields. As noted in **Table 4**, the demographic index of the Target Area ranks in the upper 56th percentile compared to the State due to largely the high percentage of low-income populations, suggesting a high exposure risk to the sensitive populations. Our community ranks in the 75th percentile in the State for low income and in the 90th percentile for low education level². As noted in **Table 3**, **more than half** of single parent families in the Target Area live in poverty, and **nearly 2/3** of CT-201 residents living in households with income under 300% of the poverty level **are children five years old or younger**. In addition, 20% of the people over 65 in the Target Area live in poverty, which has **tripled since 2016²** and is more than double the current County and State poverty rates for the elderly, evidence that multi-generational poverty is persistent and difficult to overcome (**Table 5**). Key welfare issues to the sensitive populations in our community include lack of affordable and safe/healthy housing; lack of diverse commercial amenities providing jobs and contributing to our community; and the quality of life for our children, disabled, and elderly residents.

Desperate Need for New, Healthy Housing. Housing scarcity is a resounding issue in the Target Area, with low availability citywide and **no (0.0%) vacant housing available for rent or sale in BG-2 (Table 3)**. Moreover, the housing that does exist in the Target Area (presently occupied near-capacity) is aging and low-value, with **91%** of homes in BG-2 built prior to the ban on consumer lead paint in 1978) which impacts children and complicates finding healthy housing. Further, the median home value in BG-2 (\$157,100) is 38% less than the rest of the County confirming that finding healthy housing is a challenge, especially for single parents and their children living in poverty. The Census Bureau estimates that upwards of 40% of homeowners and 60% of renters are burdened by housing costs. This unfortunately forces sensitive populations to residential areas similar to those adjacent to the Priority Sites where lead-based paint is present. Proposed reuses in the Target Area will address housing insecurity in our community per our Revitalization Plans by increasing the availability of new, healthy and affordable housing.

Improving Welfare. Assessment, cleanup and redevelopment of the Target Area for multi-family residential and green space reuse will improve welfare conditions by increasing healthy housing, decreasing contaminant source areas, and making the surrounding neighborhoods safe and walkable. Overall well-being will be enhanced by increased recreation opportunities and new trails/greenspace.

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

Asthma. The 2024 EPA Toxics Release Inventory indicates 28,662 pounds of toxic chemical waste was generated at two regulated facilities in the City, including nitric acid releases to air which can adversely impact respiratory health.¹⁰ Air quality is significant, and while no monitoring locations are located in the County, data

from the American Lung Association *State of the Air* (2025) report gives the adjacent Manitowoc County (which directly borders the Target Area) an “F” for air quality due to ozone¹¹. Although data is not available for the Target Area, the adult rate of asthma is greater in Calumet County (10.9%) than the national average (9.8%).¹¹ Per WDNR, air quality impacts from wildfires are becoming more frequent and particulate matter pollution from wildfire smoke is a growing

¹⁰ <https://www.epa.gov/toxics-release-inventory-tri-program>

¹¹ <https://www.lung.org/research/sota/city-rankings/states/wisconsin>

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Table 4. Sensitive Population & Socioeconomics (percentile in State)²	Target Area (Block Groups in CT-201)
Demographic Index	56th
Low Income	75th
<HS Education	90th
Under 5 Years Old	80th
Over Age 64	68th

Table 5. Sensitive Population & Poverty²	Target Area (CT-201)	City of Brillion	Calumet County	State of WI
Elderly (65 and older)	18%	21%	16%	18%
% Elderly in Poverty	20%	25%	8%	9%
Disabled	9%	8%	10%	12%
% Disabled in Poverty	25%	26%	20%	21%
Children (< 5)	4%	3%	5%	5%
% Population living under 300% of poverty level who are children (≤ 5)	63%	65%	42%	53%

Bold indicates worse conditions than the County; **RED** is equal/worse than County & WI.

health concern.¹² When inhaled, symptoms can range from throat irritation to severe heart and lung concerns, which are **especially dangerous for children, elderly, and people with respiratory conditions** (including asthma). Poor air quality has a disproportionate impact on our sensitive populations (Table 5), with the increase in extreme weather events accompanied by more poor air quality days.

Childhood Disabilities. As noted previously, **91% of the housing in BG-2 was built before lead paint was banned** (a known constituent of concern in the Target Area). Children (under 18) are 20% of our City’s population and are at the greatest risk for developing cognitive disabilities due to lead exposure. Although data is not available for our City, the US Census Bureau¹³ notes the rate of childhood (age <18 years) cognitive disability in our County is more than double (11.3%) the rate in Wisconsin (4.4%) and in the US (4.1%), and the overall rate of disability in the Target Areas (19%) exceeds the rate in Wisconsin (12%). Although the precise cause/source of cognitive disabilities in children is likely due to a multitude of factors, lead and other contaminants of concern identified at the Target Area are known to cause severe neurological damage and birth defects. Our children could be exposed to these constituents through consumption of impacted groundwater (in both public and private wells), which is known to be an issue in our County.

Birth Defects. Birth defect rates are not available for the Target Area. The *Wisconsin Department of Health County Profile* indicates the rate of congenital anomalies in our County is 0.8%, which is greater than the rates of four different adjacent counties.¹⁴ Groundwater contaminated with high levels of nitrates from agriculture is a well-known water quality issue in the County and has been linked to some birth defects; per the *2023 Calumet County Community Health Assessment*, **over 20%** of groundwater samples collected in the County have nitrate concentrations greater than health-based standards, nearly twice the rate of the State (10.9%).¹⁵ The health assessment also indicated that infant mortality rate for the County is 38% greater than the State.¹⁵

Overall Health and Cancer Rates. Obesity remains a significant challenge in our City, with **43% of adults in the City considered obese**¹⁶, compared to 34% nationally. The most current report from the Population Health Institute at University of Wisconsin¹² indicates the County ranks below the State for several health-based characteristics associated with sensitive populations, including: lower number of primary care physicians, dentists, and mental health providers; higher healthcare costs; increased rates of adult obesity and physical inactivity; and excessive drinking. The Target Area is in the upper 71st percentile for cancer risk due to inhalation of air toxics, which may partially explain why the Wisconsin Department of Health County Profile indicates the upper confidence interval for age-adjusted cancer rates in our County for female breast, melanoma, colorectal, lung and bronchus, and prostate cancers are all greater than the State.¹⁴ Poor groundwater quality is a known risk in the community which could also explain the poor health outcomes of the population (further described in Section 2.d).

Reduction of Health Risk. Assessment, cleanup and redevelopment of our Target Area will help mitigate these health conditions by decreasing contamination mass and source areas; improving groundwater quality; and increasing opportunities for healthy living with increased healthy housing and greenspace.

2.d. Economically Impoverished/Disproportionately Impacted Populations:

Zoning, persistent policies and questionable industrial operators have historically impacted our community. Our City’s legacy of heavy industrial activity and pollution has resulted in a disproportionate burden to our sensitive populations (e.g., children, elderly and disabled). Those lacking formal education, and single parent families/children in poverty are especially threatened. **Table 6** summarizes indicators of environmental hardship in the Target Area, which is disproportionately burdened with increased risk to children from lead exposure in housing (lead paint indicator), and abundant risks to water quality (wastewater discharge index) from brownfields.

Table 6. Environmental Burden Indices (% in WI with lower risks vs. target neighborhoods) ²	Target Area (CT-201)
Toxic Releases to the Air	33 rd
Particulate Mater	32 nd
Ozone	39 th
Lead Paint Indicator	57 th
Wastewater Discharge	93 rd
Underground Storage Tank	39 th

When considered in light of our community need **and** demographics summarized in Section 2.a., it is surprising that our community is not ranked higher for environmental burden compared to state percentiles. The lack of acknowledgment of our community is likely due to the abundant agricultural land that surrounds our small town (CT-201; calculated to be 87%

¹² <https://dnr.wisconsin.gov/topic/AirQuality/WildfireSmoke.html>

¹³ <https://data.census.gov/cedsci/>

¹⁴ <https://www.dhs.wisconsin.gov/publications/p45358-21.pdf>

¹⁵ <https://www.co.calumet.wi.us/DocumentCenter/View/9233/2023-Calumet-County-Community-Health-Assessment?bidId=>

¹⁶ <https://datacommons.org/place/geoId/5509725>

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of cultivated land).¹⁷ As such, **Table 6** does not adequately represent the need and burden in our community that has resulted from former industrial operation in our Target Area (and, subsequent environmental contamination). Given the abundance of agricultural land uses, it is not surprising that the percentage of **wells with significant nitrate contamination in the County is 10 times that of the adjacent county**, which is a significant health and environmental issue¹⁵. The frequency of emergency visits due to carbon monoxide poisoning in the County is **double** the adjacent county, which could be due to lack of maintenance of home heating systems due to limited personal finances. Seeing that our community economic condition (**Table 3**), the challenges of our sensitive populations (**Table 4** and **Table 5**), in combination with environmental burdens to our community from brownfields (**Table 6**), our City is clearly an example of a rural community facing significant resultant economic issues. The combination of these conditions has disproportionately left low-income residents living near former industrial operation and brownfield sites without financial means to relocate, thus roofing families in neighborhoods with highest health threats.

Reduction of Economic Impoverishment. Assessment, cleanup and redevelopment in the Target Area will offer relief to our underserved community by creating healthy, livable and walkable neighborhoods with increased healthy housing. In lieu of motorized vehicles, increased walkability and trail continuity between the Target Area, neighboring parks, and downtown will encourage pedestrian/bike traffic, which will improve air quality by decreasing diesel particulates, air toxins, and ozone. Increasing housing security and building healthier communities are directly associated with decreased crime rates and increase in quality of life. In addition, cleanup in the Target Area will include climate resilient remedial solutions to preserve flood storage while mitigating subsurface impacts to Spring Creek, which is a tributary to the Manitowoc River. Multi-family housing redevelopment in the Target Area per our Revitalization Plan will increase property values by remediating contamination and turning brownfields into an asset that can be enjoyed by the community. In turn, redevelopment will increase property values and local tax revenue for the City to continue its mission of transforming Brillion Iron Works into a destination to work, stay and play.

Community Engagement: 2.e. – 2.g. Prior/Ongoing Community Involvement: Community outreach activities were bolstered during preparation of the 2023 *Revitalization Plan* through workshops and questionnaires. As part of this effort, we engaged with the public in a variety of ways, including an open house to gain insight into community needs that the project could meet. We solicited and considered responses from dozens of attendees; their feedback is the backbone of our Revitalization Plan for the Target Area today, which is tailored to their priorities of increased housing (Priority Site 1 & 2) and community greenspace (Priority Site 3). The 2025 *City Plans* were also developed with input from our community members, which was gathered during public meetings, charettes, and during the County Fair. Public outreach is a pillar of our approach to ensure that community voices are heard and will continue to guide our goals for planning future assessment, cleanup, and reuse of brownfields in our community.

2.f. – 2.g. Project Involvement, Project Roles: Our Brownfield Advisory Committee (BAC) was established seven years ago. The BAC will be expanded during this grant to include residents and organizations working in/with our community were selected to address needs discussed in Section 2.a. Our community and those affected directly by the Target Area will be engaged through a Community Involvement Plan (CIP) to be developed in Fall 2026 in collaboration with the BAC. Members on **Table 6** affirm their commitment to serve on the BAC and ensure our community’s voice is heard.

Table 6. Members of the Brillion Brownfields Advisory Committee

Organization	Entity’s Mission	Point of Contact	Partner Role / Specific Expertise on BAC
Brillion Chamber of Commerce	Leading organization dedicated to economic/business development	Matt Meyers; President info@brillionchamber.com	Facilitate successful reuse of the Target Area by identifying and finding resources to encourage commercial businesses to locate/build at the Brillion Iron Works property to create jobs.
Habitat for Humanity (non-profit)	Organization working on housing insecurity	Amy McGowan; Director of Development 920-954-8702	Provide guidance on redeveloping the Target Area for residential reuse.
Community Member at Large	Provide opportunity for local input on cleanup and reuse	Sarah Pielhop sarah@pielhopwieting.com	Local business owner and Brillion resident with experience acquiring and redeveloping brownfields in Brillion; provide community input
Community Foundation for the Fox Valley Region (non-profit)	CBO working on family health and housing insecurity	Ann Engelhard; aengelhard@cffoxvalley.org	Provide financial support for residential and greenspace reuse at the Target Brownfield; connect residents to resources.
EPA and WDNR Project Managers	To Be Determined - Provide technical assistance and review of program management, assessment, and cleanup planning work products (outlined in Section 3).		

¹⁷ USDA, National Land Cover Data Set (NLCD), 2019

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Organization	Entity's Mission	Point of Contact	Partner Role / Specific Expertise on BAC
The Health Officer of the Calumet County Health Department (Amber Bastian; 920-849-1400) will attend BAC meetings and community outreach meetings to answer health-related questions/concerns related to the Target Area.			

2.h. Incorporating Community Input: Our community engagement is the utmost priority to ensure assessment, cleanup and redevelopment of the Target Area is successfully integrated into the community. Within one month of the award, the City (grantee) will develop a site-specific CIP to leverage the expertise and networks of the BAC. The CIP will be designed specifically to engage and inform our community members and provide an avenue for input/feedback from our community. The CIP will also discuss how community input will be considered and responded to. The approved CIP will be implemented in Q1 FY27 utilizing the BAC to engage the community and local businesses in the assessment, cleanup, and redevelopment of the Target Area. The timeline for community meetings will be outlined in the CIP. Meetings will be held at least once per quarter and at key points during the project, including: 1) upon grant award to discuss project initiation, tasks, schedule, and expectations with the community; 2) at key milestones for cleanup and assessment; and 3) upon completion of grant activities. The CIP will include a variety of in-person and virtual options via online meeting platforms, social media, and webpage/email updates. To ensure everyone in our community has an opportunity to attend, CIP meetings will be held in the evenings to accommodate work schedules of stakeholders and will be held at our City Hall, which is walking distance of the Target Area and is ADA-compliant to accommodate the needs of sensitive populations (e.g., disabled or elderly). Physical copies of all project outputs will be made available at City Hall. As renderings are developed, the local newspaper and our City Facebook page will be a significant source of publication. Displays of the Target Area renderings at the summer farmers' market and County Fair will also allow feedback opportunities from our community, with QR codes on posters will allow for direct, immediate feedback on the project. Although it is anticipated that most communications will be in English, it is important that non-English speaking households are aware of the environmental activities that directly impact them. As such, our City will work with project partners to develop and distribute information in Spanish, as well as offer translation and interpretation services as needed. Spanish speakers will be reached through our regional Spanish station (92.7 FM) and translation materials will be made available at local retailers frequented by these members of our community (e.g., churches, laundromats, community center, and retail outlets).

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS:

Description of Tasks/Activities and Outputs:

3.a. – 3.d. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, and Outputs:

We have developed the appropriate tools and procedures to immediately begin implementation of the grant. We have retained a QEP consulting firm per 2 CFR 200.317-200.326 and 2 CFR 1500. Site assessments of the Target Area will begin in Q1 FY27, and cleanup activities are anticipated to begin Q2 FY28. Descriptions of eligible tasks, schedule, activity leads, and outputs to be funded by this grant are described below. No subawards or participant support costs/stipends for community liaison are proposed to be funded as part of this grant.

Task 1 - Activity: Program Management
a. Project Implementation: Competitively procure, manage & finalize contracts for remedial contractors; prepare quarterly reports & annual financial reports; update Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; prepare grant closeout report.
b. Anticipated Project Schedule: Procure remedial contractor following federal acquisition regulations by Q2 FY28, and additional remedial contractors as needed throughout the project. Quarterly reports will be submitted by Jan. 30th, April 30th, July 30th, and Oct. 30th of each year, with the first due on Jan. 30, 2027. ACRES database to be maintained over full duration of project. Annual financial reports will be submitted by Oct. 30 th of each year, with the first due on Oct. 30, 2027. Grant closeout expected Q1 FY30.
c. Task/Activity Lead: City Project Manager (PM) and City Project Coordinator, with support from QEP.
d. Outputs: Administrative records & ACRES updates; RCC procurement documentation; (12) quarterly reports; (3) annual financial reports; (1) grant closeout report. Number of outputs assumes schedule holds.
Task 2 – Activity: Site Assessment
a. Project Implementation: Adapt existing Quality Assurance Project Plan (QAPP) with annual updates. Review the City's existing brownfield inventory and identify <u>additional</u> potential sites for assessment. Prepare the following for the three Priority Sites identified in Section 1.b <u>and additional</u> sites prioritized for assessment: Eligibility Determinations (EDs); Phase I Environmental Site Assessments (ESAs); Phase II ESAs; Site-Specific Sampling and Analysis Plans (SSSAPs), Site Investigations (SIs) & Supplemental SIs (SSIs). ED requests will be submitted to the EPA (for hazardous substance brownfields) or the WDNR (for petroleum brownfields) for approval. Phase I ESAs will comply with the All-Appropriate Inquiry Final Rule and ASTM

E1527-21. Phase II ESAs will be conducted per ASTM 1903-19. SIs and SSIs will be prepared per the WDNR requirements found in ch. NR 700 Wisconsin Administrative Code.
b. Anticipated Schedule: QAPP update, first EDs & first SSSAPs by Q1 FY27, with ongoing assessment & cleanup planning work through grant performance period.
c. Task/Activity Lead: QEP at the direction of City PM, with input from community/BAC on additional sites.
d. Outputs: (5) EDs; (2) Phase I ESA; (1) QAPP & (2) annual QAPP updates; (5) SSSAPs, (2) Phase II ESAs, (3) SIs, (3) SSIs. Number of outputs assumes A) each of the three Priority Sites will include an ED, SSSAP, SI, & SSI; and B) that two additional sites prioritized for assessment will include an ED, Phase I ESA, SSSAP & Phase II ESA.
Task 3 – Activity: Cleanup Planning & Oversight
a. Project Implementation: Prepare/perform the following for the three Priority Sites identified in Section 1.b: Analysis of Brownfield Cleanup Alternatives (ABCAs); Remedial Action Plans/Material Management Plans (RAP/MMPs), waste disposal profiles & bid specifications; oversee cleanup activities & Davis-Bacon Act (DBA) compliance; prepare Construction Documentation Report (CDR); establish institutional controls; and prepare site closure reports.
b. Anticipated Project Schedule: Cleanup planning & oversight activities expected to begin following initial site assessments in <i>Task 2</i> (estimated Q4 FY27). Complete DBA compliance records concurrent with <i>Task 4</i> .
c. Task/Activity Leads: City PM and QEP, with input from WDNR and EPA PMs.
d. Outputs: (3 each) ABCAs, RAP/MMPs, waste disposal profiles, bid specifications, daily construction logs, DBA compliance summary, CDRs, institutional controls, and site closure reports.
Task 4 – Activity: Cleanup (Remedial Contractors Only)
a. Project Implementation: Implement cleanup plans for the three Priority Sites once approved in <i>Task 3</i> .
b. Anticipated Project Schedule: Cleanup activities expected to begin following cleanup planning activities in <i>Task 3</i> (estimated Q2 FY28 through Q4 FY29).
c. Task/Activity Leads: City PM, RCC PM(s) (to be retained in Q2 FY28) & QEP PM.
d. Outputs: Daily construction logs; landfill tickets.
Task 5 – Activity: Community Outreach
a. Project Implementation: Prepare and implement a Site-Specific CIP. Host quarterly public meeting to discuss Target Area cleanup and redevelopment plans for Priority Sites and <u>additional</u> sites; community events; attend National Brownfield Conference.
b. Anticipated Project Schedule: First Quarterly meeting Q1 FY27; Brownfield Conference Q3 FY27.
c. Task/Activity Leads: City PM and BAC, with input from QEP.
d. Outputs: (1) CIP; meeting deliverables, City website updates, press releases & presentation materials.

3.e. Cost Estimates: Personnel (\$38/hr) and fringe (\$12/hr) are an average of City staff. Contractual and construction estimates are based on costs realized under our City’s FY24 & FY25 EPA Brownfield cleanup grants, which were subject to DBA requirements.

Budget Categories		Task 1	Task 2	Task 3	Task 4	Task 5	Admin. Costs	Total
		Program Management	Site Assessment	Cleanup Planning & Oversight	Cleanup	Community Outreach		
Direct Costs	Personnel	\$8,000	\$3,800			\$4,500		\$16,300
	Fringe	\$3,400	\$1,200			\$2,700		\$7,300
	Supplies					\$1,450		\$1,450
	Travel					\$3,100		\$3,100
	Contractual	\$10,800	\$319,250	\$217,500		\$10,800		\$558,350
	Construction							
	Other (Construction)				\$401,800			\$401,800
Other (WDNR Fees)		\$11,700					\$11,700	
TOTAL BUDGET		\$22,200	\$335,950	\$217,500	\$401,800	\$22,550	\$0	\$1,000,000

Task 1 – Program Management
Cost Basis and Assumptions: Personnel/Fringe Costs of **\$11,400** are budgeted for an estimated 228 hours (@ \$50/hr) of work our City PM and staff to manage the cooperative agreement as follows: manage QEP activities (4hr/month=144hr); preparation of quarterly reports and maintenance of the ACRES database

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(3hr/quarter=36hr); annual financial and DBE reporting (8hr/year=24hr); and prepare grant closeout report (24hr). Contractual Costs of \$10,800 are budgeted for an estimated 72hr (\$150/hr) of work by QEP in providing assistance in completing various required reports.
Task 2 – Site Assessment
Cost Basis and Assumptions: <u>Personnel/Fringe Costs</u> of \$5,000 are budgeted for an estimated 100hr (\$50/hr) of work our City PM and staff for developing and issuing bid specs (40hr); reviewing project deliverables (20hr); and coordination during onsite field work (40hr). <u>Other “WDNR fees”</u> for regulatory oversight reviewing project deliverables is \$11,700 . <u>Contractual Costs</u> of \$319,250 are budgeted for the following to be performed by the QEP: adapt QAPP annually (\$6,000 per year, \$18,000 total), prepare SSSAPs (5 sites @ \$9,250 each), EDs (5 sites @ \$5,000 each), PI ESAs (2 sites @ \$10,000 each), PII ESAs (2 sites @ \$15,000 each) SIs (3 sites @ \$37,500 each), and SSIs (3 sites @ \$22,500 each).
Task 3 – Cleanup & Oversight
Cost Basis and Assumptions: <u>Contractual Costs</u> of \$217,500 are budgeted for the following to be performed at the three Priority Sites by the QEP: prepare ABCAs (3 sites @ \$10,000 each), RAP/MMPs (3 sites @ \$12,500 each), remedial contractor oversight at and DBA documentation (60 days@\$1500/day); CDRs (3 sites @ \$10,000 each), and site closure reports (3 sites @ \$10,000 each).
Task 4 – Cleanup
Cost Basis and Assumptions: <u>Construction Costs</u> of \$401,800 are budgeted for: excavation and offsite disposal of non-PCB impacted fill (450yd ³ @ 100/yd ³); excavation and offsite disposal of PCB-impacted fill (300yd ³ @ \$400 yd ³), excavation and transportation of onsite beneficial reuse of buried impacted foundry sand (6760yd ³ @ \$5yd ³); importing soil (11,000yd ³ @ \$14/yd ³); constructing engineered barriers and finishing vegetated barriers with native plants and turfgrass (9,800yd ² @ \$5/yd ²).
Task 5 – Community Outreach
Cost Basis and Assumptions: <u>Personnel/Fringe Costs</u> of \$7,200 are budgeted for an estimated 144hr (\$50/hr) of work by our City PM and staff (12hr/quarter \$50/hr) for planning/hosting outreach activities. <u>Supply Costs</u> of \$1,450 are budgeted for printing costs (\$1,000) and mailing costs for public notices (\$450). <u>Travel Costs</u> of \$3,100 are for (2) City staff to attend the three-day National Brownfield Conference in 2027: \$1,560 for meals and for lodging (\$260/person/night); \$700 for registration (\$350/person); \$700 for air travel (\$350/person); and \$140 for ground transportation (\$70/person). <u>Contractual Costs</u> of \$10,800 are budgeted for an estimated 72hr of work by the QEP (\$150/hr) to prepare a site-specific CIP and assist with outreach activities.

3.f. Plan to Measure and Evaluate Environmental Progress and Results: Project results and outputs will be tracked, and progress measured/evaluated **weekly** using existing tools developed by our City and summarized in quarterly progress reports and annual financial reports prepared during the project under Task 1 described in Section 3.a-3.d. Project outputs, progress, and schedule will be tracked continuously using Microsoft Project to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of our community. For measuring and evaluating progress, outputs will be compared to the project schedule proposed in Section 3.a; if a deviation of more than one fiscal quarter is reached, interventions (ex. increased team meetings) will be implemented to maintain the project schedule. Project outcomes and accomplishments, including project milestones, deliverables, and leveraged resources will further be tracked on a **monthly/quarterly** basis in the ACRES database to further measure progress. Project-specific outcomes will be tracked/quantified in the final progress report by comparing future community demographics/welfare characteristics to current conditions and will include: 1) increase in shovel-ready portions of the Target Area suitable for multi-family residential redevelopment and 2) leveraged investment in the Target Area. Outcomes advancing our City’s *Plans* and Target Brownfield objectives include: 1) increase in developer interest in other portions of the Target Area and more broadly, 2) increase in property values in the vicinity of the Target Area. If the timelines for advancing one or more phases of work at the Target Area are not well-aligned with the EPA grant project period, the City and the QEP will work with EPA and WDNR to adjust the approach to maintain progress on achieving the project outcomes. Outcomes will be **tracked long-term** on a five-year basis by our City and reported in future brownfield conferences, fact sheets and/or on our website

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE:

Programmatic Capability: 4.a-c. Organizational Capacity, Organizational Structure, Description of Key Staff:
 This grant will be managed by high-performing team of our City staff members who established our City’s Brownfields program, **timely and successfully expended** EPA FY19 cleanup grant funds and are managing the City’s current FY24 and FY25 cleanup grants through technical, administrative and financial expertise. Over the course of the last six years, we have managed over **\$3,000,000** in federal and state funding. We have retained a QEP consulting firm

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per the requirements of 2 CFR 200.317 - 200.326. We will also use the expertise of the BAC, WEDC, and EPA to provide guidance and marketing to promote reuse of the Target Area.

Mrs. Heather Gilbertson will serve as our City's Brownfield Project Manager. Growing up just down the street from Target Area, Mrs. Gilbertson has witnessed firsthand the rise and decline of Brillion Iron Works and the lasting impacts the Target Area has left on our community. Despite these challenges, Mrs. Gilbertson remains deeply committed to preserving the welcoming and close-knit character of our community by actively serving in an administrative role at our City Center. Furthermore, Mrs. Gilbertson has successfully overseen and implemented the FY24 and FY25 brownfield cleanup grants awarded to our City.

Mr. Andrew Maertz, Public Works Supervisor, will function as the Brownfield Project Coordinator for this project and will support Mrs. Gilbertson in coordinating work with the QEP and other City departments. As a lifelong resident of the area, Mr. Maertz is deeply committed to the community. Mr. Maertz has served on the Reedsville Public School Board since 2008, as well as the board of control for The Cooperative Educational Service Agency #7, Wisconsin Association of School Boards, Wisconsin School Music Association, and serves as a director of numerous other regional and statewide associations.

In the event of future personnel turnover, the planned "team" approach will prevent any interruptions with the implementation of the project. Mr. Maertz will be involved in daily grant operations and can immediately step in as either interim or replacement project manager in the case of loss/reassignment of the active Brownfield Project Manager. Mrs. Gilbertson and Mr. Maertz will be supported by our City administrative support staff.

4.d. Acquiring Additional Resources:

The City routinely hires subcontractors and consultants to support municipal projects and will continue to do so in support of cleanup and redevelopment of the Target Area. As a small community, the City does not have a program to specifically promote local hiring/procurement to directly link members of the community to brownfield redevelopment work. However, the City will retain a remedial contractor(s) under this grant per 2 CFR 200.317 - 200.326 and 2 CFR Part 1500. The City will additionally utilize the support of local community members comprising of the BAC, as well as the WEDC and EPA for guidance throughout the course of the project

Past Performance and Accomplishments:

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

4.e.(1) Accomplishments: 4.e.(2) Compliance with Grant Requirements:

We have received and managed millions of dollars from federal and state agencies. Our accomplishments detailed below show our dedication and commitment in the continuance of redeveloping brownfields in the Target Area to enhance quality of life for our community.

EPA Brownfield Cleanup Grant for Hazardous Substances (FY19; \$500,000)

(1) Accomplishments: The City exceeded performance expectations by making 13.2 acres ready for reuse while leveraging \$10,000,000 in private investment at three Redevelopment Areas in the Target Brownfield. Work included remedial design sampling, construction of 2 acres of soil engineered barriers, remedial/reuse planning, and removal of a large underground storage tank formerly abandoned in place. These accomplishments were critical for our community by removing contamination, preventing contact with contamination, and providing a seed for future development interest by making these areas shovel-ready. Achievements are accurately reflected in ACRES.

(2) Compliance with Grant Requirements: The City maintained compliance with the workplan/schedule and the terms/conditions of the cooperative agreement. We submitted the required annual financial reports, quarterly reports, and project deliverables in a timely manner per the workplan and cooperative agreement schedule. We kept the ACRES database up to date during the grant performance period. The closeout report was submitted on schedule. No funds remained when the final report was submitted.

EPA Brownfield Cleanup Grant (FY24; \$500,000) & EPA Brownfield Cleanup Grant (FY25; \$1,983,145)

(1) Accomplishments: Utilizing both FY24 and FY25 cleanup grants, we have continued with steady progress of redevelopment in the Target Area by realigning Spring Creek to remove a large portion from the floodplain. With flooding hazards now mitigated, this monumental step improves local climate resilience and enables multi-family redevelopment to occur. Construction of the new stream channel is underway and will be completed in Spring FY26.

(2) Compliance with Grant Requirements: We have maintained compliance with the workplan/schedule, terms/conditions of the cooperative agreement, and achievements continue to be reflected in ACRES. Quarterly and annual financial reports have been submitted on time for both the FY24 and FY25 cleanup grants. Both grants will finish early and zero funds will remain by Q4 FY2026.

ATTACHMENT B: THRESHOLD CRITERIA RESPONSES

Name of Applicant: City of Brillion, Wisconsin

1. Applicant Eligibility

The City of Brillion, Wisconsin (City) is a “general purpose unit of local government” as that term is defined in 2 CFR 200.64 and is therefore eligible to receive a USEPA cooperative assessment agreement.

2. Community Involvement

The City of Brillion recognizes the importance of engaging the community to facilitate decision making and revitalization success. The City and representatives mentioned on Page 4 and Page 10 will collaborate together in quarterly meetings to share information regarding the Target Area and to receive input from the community.

Online tools will also be used to send and receive information. The City’s website and social media will describe assessment and cleanup efforts, promote engagement opportunities and highlight opportunities for community input. In addition, the City will communicate with the community through neighborhood gatherings (i.e. Farmers Market), non-profit groups, newsletter mailings, and other communication tools. All written outreach materials will be made available in English and Spanish. These proposed outreach tools are appropriate for the community, as the City has used these communication methods with previous success to assess and cleanup prior areas of the Target Brownfield.

Furthermore, the City will provide virtual meetings and on-line platforms for those in the community who cannot physically attend meetings

3. Target Area

The Target Area for this grant application is **Redevelopment Area 5**– 12.62 acres of the east-central portion of the 145-acre Brillion Iron Works Redevelopment located on the eastern side of the City of Brillion, Wisconsin.

4. Affirmation of Brownfield Site Ownership

The City of Brillion owns Redevelopment Area 5 (Target Area) within the 145-acre Greater Brillion Iron Works Redevelopment (Target Brownfield). The City affirms that we own this site and meets the CERCLA § 101(39) definition of a brownfield.

- a) The site is not listed (or proposed for listing) on the National Priorities List;
- b) The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA;
- c) and the site is not subject to the jurisdiction, custody, or control of the U.S. government.

5) Use of Grant Funds

The City of Brillion will conduct multiple Phase I Environmental Site Assessments, Phase II Environmental Site Assessments, Site Investigations, Supplemental Site Investigations, and remediation/cleanup activities. Assessment and cleanup tasks are specifically outlined on Page 2 (discussion of Priority Sites) and Pages 9-11 description of tasks.

The City of Brillion will remediate at least one site as described on Page 2 and Pages 9-11 description of tasks.

Two revitalization plans exist for the Target Area known as the *2023 Brillion Works Reuse Plan* (“Revitalization Plan”) and the *Calumet County 20245 Comprehensive Plan – City of Brillion* (“City Plans”). Both the Revitalization Plan and City Plans were created specifically for the Target Area/Target Brownfield to describe the revitalization approach that aligns directly with community priorities and needs as described on Page 3.

6) Expenditure of Existing Grant Funds

The City of Brillion does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

7) Contractors and Named Subrecipients

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

The City of Brillion issued a Request for Qualifications for comprehensive brownfield services on September 5, 2024, with a due date of October 7, 2024 (32 days). The RFQ was published on the City’s website and in the Brillion newspaper (see below).

<p>REQUEST FOR QUALIFICATIONS (RFQ) FOR QUALIFIED ENVIRONMENTAL PROFESSIONAL SERVICES City of Brillion, WI</p> <p>The City of Brillion (City) has prepared a Request for Qualifications for Qualified Environmental Professional Services (RFQ) for the former Brillion Iron Works (BIW) site located at 200 Park Avenue, Brillion, Wisconsin. The City of Brillion is seeking a Qualified Environmental Professional (Consultant) as defined in 40 CFR §312.10 to carry out necessary tasks outlined within this Request for Qualifications (RFQ). The Consultant’s responsibilities will include oversight, testing, and monitoring during remediation work at the site, as well as post-construction project documentation and reporting and grant agreement management. The Consultant’s activities are being conducted as part of the City’s recently awarded brownfield cleanup grant from the United States Environmental Protection Agency (EPA), which will remain in effect through September 2027. The Consultant will work under the direction of the City’s staff and or representatives, and will work in collaboration with other City representatives, as necessary. The EPA and Wisconsin Department of Natural Resources (WDNR) will be actively involved in the project including reviewing and receiving reports on program activity throughout the lifetime of the grant.</p> <p>Proposal packets are available by contacting the Brillion City Center, 201 N. Main Street, Brillion, WI 541101. Tel: (920) 756-2250. Consultants need to provide one printed RFQ paper copy sent to the Brillion City Center, Attn.: City Administrator, 201 N. Main Street Brillion, WI 54110 and one RFQ electronic copy email admin@brillionwi.gov until 12:00 pm local time on Thursday, September 19, 2024. No submittals will be accepted after that time and date. Questions concerning the proposal should be directed to Administrator, at the above email or phone number.</p> <p>Patricia Schreiber City Administrator</p> <p style="text-align: right;">WNAXLP Sept. 5, 12</p>
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RFQ Announcement Published in the Brillion News on September 5, 2024
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The RFQ scored responses by: Firms Qualifications / Firm Resources / Consultants (25%); Related Projects of Firm / Related Projects of Project Personnel, Knowledge of rules of EPA & WIDNR (25%); Project Requirements and Timeline (25%); and **Budget/Cost (25%)**. The City received and considered responses and selected Stantec.

The September 5, 2024, RFQ and Stantec’s contract are available through OneDrive. Please email the grant applicant Heather Gilbertson (clerk@brillionwi.gov) for the login and password.

Subrecipients. Subrecipients are not named in the grant application.