RE: Grant Proposal by the Community Development Authority of the City of Manitowoc, Wisconsin to the United States Environmental Protection Agency for a Brownfield Cleanup Grant for the Phase I Cleanup Area of the River Point District.

The Community Development Authority of the City of Manitowoc, Wisconsin (CDA) is pleased to submit the enclosed proposal to the United States Environmental Protection Agency (USEPA) for a cleanup grant for $500,000 as part of the USEPA Fiscal Year (FY) 2022 Brownfield Grant Competition.

The City of Manitowoc (City) is a community of hard-working residents with great schools and innovative businesses. We are a culturally diverse community not content to sit back and let things happen, but actively chart our future in a rust-belt community. It is with this spirit of determination that the City developed a highly successful brownfield redevelop program, which has **leveraged on average $68 per each USEPA grant dollar** awarded to the City since their first brownfield grant in FY2011. The City’s leadership in brownfield redevelopment is now recognized regionally and nationally as an example of how a once moribund community can chart a new path by redeveloping blighted liabilities into community assets. It is with the courage that comes from over a decade of brownfield experience that the CDA acquired a 20-acre former heavy-industrial peninsula formed by the Manitowoc River (referred to locally as the **River Point District Target Area**; take a [video tour](#)) and is investing a significant amount of public resources in facilitating redevelopment by installing new infrastructure, constructing new roads, and creating new recreation areas in the **Phase I Cleanup Area (Target Property)**.

The Target Property was used for well over 110 years for a multitude of industrial uses, including many uses that initially defined/built Manitowoc, with each use being considered the highest and best use of the Target Property given the historic context and needs of the community at the time. The proximity of the Target Property to the Lake Michigan/Great Lakes shipping route facilitated initial large scale lumber mill and transloading development by 1868. With complete redevelopment in the late 19th Century into a regional bimodal railroad/shipping port providing rail access onto cargo ships, goods could be carried by rail directly from factories in Manitowoc and driven onto cargo ships at the River Point District for transport and delivery to other ports on the Great Lakes.

Panoramic View of the Target Area and Target Property in 1898 ([source: Manitowoc Historical Society](#))
As shown to the right, rail infrastructure in the 20th Century included a railyard (e.g., coal storage, engine house, turntable, depot and miles of track) and a bimodal rail and shipping port. Tenants quickly developed portions of the Target Property for junk/scrap yard, bulk petroleum storage, grain elevator, and large warehouse uses.

However, the historic industrial uses of the Property for well over a century have left a legacy of residual environmental impacts currently preventing the community from redeveloping the Target Property to its next highest and best use, thus prompting this request for funding. To address critical community needs, the Target Property will be redeveloped as a destination space anchored by mixed commercial, residential, and greenspace amenities (see redevelopment plan below).

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

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

2. **Funding Requested**
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested:
      i. Requested Amount: $500,000
      ii. Waiver of 20% Cost Share Requirement: No
      iii. Waiver of the $500,000 Limit: No

3. **Location**
   a. City: City of Manitowoc
   b. County: Manitowoc County
   c. State: State of Wisconsin

4. **Property Information for Site-Specific Proposals**
   a. Property Name: River Point District Phase I Redevelopment Area
   b. Property Address: North 11th Street and Buffalo Street; Manitowoc, Wisconsin
5. Contacts

a. Project Director - Community Development Authority of the City of Manitowoc:

<table>
<thead>
<tr>
<th>Project Director</th>
<th>Highest Ranking Elected CDA Official</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adam Tegen</td>
<td>John Stangel</td>
</tr>
<tr>
<td>Executive Director</td>
<td>Chair of CDA Board of Commissioners</td>
</tr>
<tr>
<td>(920) 686-6931</td>
<td>(920) 682-4644</td>
</tr>
<tr>
<td><a href="mailto:ategen@manitowoc.org">ategen@manitowoc.org</a></td>
<td><a href="mailto:jstangel@salutzlaw.com">jstangel@salutzlaw.com</a></td>
</tr>
<tr>
<td>900 Quay Street</td>
<td>823 Marshall St, PO Box 187</td>
</tr>
<tr>
<td>Manitowoc, WI 54220</td>
<td>Manitowoc, WI 54221</td>
</tr>
</tbody>
</table>

b. Chief Executive/Highest Ranking Elected City Official

Name: Justin Nickels, Mayor of the City of Manitowoc
Phone: (920) 686-6980
Email address: jnickels@manitowoc.org
Mailing Address: 900 Quay Street; Manitowoc, WI 54220


a. City of Manitowoc = 32,720

7. Other Factors Checklist

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td></td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or</td>
<td></td>
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<tr>
<td>United States territory.</td>
<td></td>
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<tr>
<td>The priority brownfield site(s) is impacted by mine-scarred land.</td>
<td></td>
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<tr>
<td>Secured firm leveraging commitment ties directly to the project and will</td>
<td>X (see p. 2)</td>
</tr>
<tr>
<td>facilitate completion of the project/reuse; secured resource is identified in</td>
<td></td>
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<tr>
<td>the Narrative and substantiated in the attached documentation.</td>
<td></td>
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<tr>
<td>The priority site(s) is adjacent to a body of water (i.e., the border of the</td>
<td>X (see p. 1 and</td>
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<tr>
<td>priority site(s) is contiguous or partially contiguous to the body of</td>
<td>ABCA)</td>
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<tr>
<td>water, or would be contiguous or partially contiguous with a body of water</td>
<td></td>
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<tr>
<td>but for a street, road, or other public thoroughfare separating them).</td>
<td></td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>X (see p. 2)</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy</td>
<td></td>
</tr>
<tr>
<td>from wind, solar, or geothermal energy.</td>
<td></td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency</td>
<td>X (see p. 2)</td>
</tr>
<tr>
<td>measures.</td>
<td></td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired</td>
<td>X (Plant to close in 2023)</td>
</tr>
<tr>
<td>power plant has recently closed (2011 or later) or is closing.</td>
<td></td>
</tr>
</tbody>
</table>

8. Letter from the State Environmental Authority

A letter of acknowledgement from the Wisconsin Department of Natural Resources is attached.
November 19, 2021

Adam Tegen
Executive Director
Community Development Authority of the City of Manitowoc
900 Quay Street
Manitowoc, Wisconsin 54220

Subject: State Acknowledgement Letter for the Community Development Authority of the City of Manitowoc
FY22 EPA Site-specific Cleanup Grant

Dear Mr. Tegen:

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

The DNR is fully committed to a collaborative partnership with the CDA of the city of Manitowoc, and will support your brownfield 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 these 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 EPA funding for this grant application is consistent with community needs, 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,

Jenna Soyer, Policy and Program Operations Director
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

Copy: Tauren Beggs – DNR NER
1.a Project Area Description and Plans for Revitalization – Target Area and Brownfields
(i) Background and Description of Target Area. The City of Manitowoc (City), Wisconsin is located on the western shoreline of Lake Michigan at the confluence of the Manitowoc River (River). Development in Manitowoc in the early 1800s by European settlers was agricultural, fishing, lumber, and shipbuilding. Settlement was followed in the mid-late 19th Century by large-scale industrial development (tanneries and metal works/foundry operations) in Block Group 5 (BG-5), which is the historic industrial portion of Census Tract 4 (CT-4). However, manufacturers struggled to move large quantities of goods into and out of Manitowoc solely by rail. The Target Area in BG-5 (referred to locally as the River Point District) forms a 21-acre peninsula into the Manitowoc River with 3,500 linear feet of frontage, which made it uniquely suitable for development as a railroad loading/transloading yard and shipping port in the late 19th Century. As a bi-modal port, early operations at the River Point District allowed direct rail access onto cargo ships meaning goods could be carried by rail directly from factories in Manitowoc and driven onto cargo ships at the River Point District for transport and delivery to other ports on the Great Lakes. The collapse of manufacturing in the 1970s resulted in hundreds of potential brownfield sites in the area and contributed to a loss of thousands of jobs and millions of dollars in taxes/wages with the economy of the area crumbling. Our current brownfield inventory activities have already identified over 132 parcels of land (115 acres) in CT-4 alone (citywide: 461 parcels totaling 2,321 acres) as Brownfield sites.

(ii) Description of the Proposed Brownfield Site. After decades of negotiations, the Community Development Authority of the City of Manitowoc (CDA; the grant applicant) acquired the River Point District in April 2019 for the purpose of blight elimination and has invested over $4,300,000 in the property to date. The Phase I Redevelopment Area (defined herein as the “Target Property”) consists of all or portions of 11 contiguous parcels of land totaling approximately 8 acres and forming the southeast portion of the River Point District. Prolonged industrial (e.g. junk yard, bulk petroleum storage, grain elevator, material transloading) and railroad (e.g. turntable, engine house, maintenance shed) operations at the Target Property have resulted in considerable need for USEPA funding to cleanup environmental contamination which exceeds state cleanup levels at this brownfield. The greatest needs to be addressed with cleanup and redevelopment are (1) increased residential/worker housing options to support rebuilding the downtown commercial district, (2) increased commercial and appealing retail amenities to increase jobs and attract outside businesses, and (3) increased greenspace to connect multi-modal trails. The cleanup and eventual redevelopment of the Target Property and the greater Target Area is consistent with community needs and will bring catalytic improvements to the quality of life in Manitowoc to address significant blight, poor economic conditions, and welfare discussed in Section 2.a.

All structures at the Property were recently removed, and the Property is unoccupied. This 8-acre Property represents the greatest potential to catalyze immediate economic investment in downtown Manitowoc. However, soil and groundwater are known to be impacted by heavy metals, polycyclic aromatic hydrocarbons, volatile organic compounds, and polychlorinated biphenyls. The risks to human health from identified contaminants include birth defects, cancer (liver, brain, lung), and nervous system and reproductive system damage. The Target Property is located along 1,500 feet of the Manitowoc River shoreline, which flows to Lake Michigan, approximately ½ mile downstream. The proximity of the Target Property to the River puts critical surface water at risk from contaminant migration.

1.b Project Area Description and Plans for Revitalization – Revitalization of the Target Area
(i) Reuse Strategy and Alignment with Revitalization Plans. The cleanup and redevelopment of BG-5 is in alignment with existing reuse plans. The North Central River District Redevelopment Plan is substantially complete and focuses specifically on the Target Property and will guide the project. This Plan will be supplemented by the City of Manitowoc Comprehensive Plan, the Manitowoc River and Trail Corridor Plan, the Downtown Master Plan, the Downtown Parking Analysis, and the Tax Increment District Nos. 16 & 22 Project Plans (collectively referred to herein as the “Plans”). The Plans collectively highlight the reuse strategy for redeveloping the Target Property for mixed-use multi-family residential and commercial reuses. This reuse strategy is in direct alignment with community priorities and needs, as expressed by community members and members of the BAC during numerous public meetings/charettes held during development of the Plans. For example, the community realizes there is a severe lack of housing in the downtown area; therefore, a large portion of the Target Property is targeted to multi-family reuse. As a gateway property to downtown, redevelopment of the Property for mixed-use will advance the goals of the Plans by increasing residential/commercial opportunities in the downtown area while increasing greenspace/parkland and enhanced recreational access to the River and the bimodal trail. By providing for increased housing options in downtown Manitowoc, redevelopment of the Target Property will catalyze infrastructure investment and commercial growth in downtown Manitowoc. By increasing recreational access to the River, the Target Property will become a destination space to spur commercial investment in downtown Manitowoc. A small portion of the Target Property adjacent to the River is in FEMA flood zone AE. The proposed

1 Take a video tour on YouTube: River Point District
2 Health impacts per [www.attf-cdc.gov/hioxtox/index.csp](http://www.attf-cdc.gov/hioxtox/index.csp)
Select acronyms: Target Property = Phase I Cleanup Area of the River Point District; CDA = Community Development Authority of the City of Manitowoc; BAC = Brownfield Advisory Committee; RAP/MMP = Remedial Action Plan/Material Management Plan; ABCA = Analysis of Brownfield Cleanup Alternatives; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; blue text are hyperlinks to source material.
remediation of the riverbank by constructing a vegetated soil engineered barrier (cap) along the shoreline will stabilize the shoreline and provide for needed flood storage, while eliminating the risk for mobilization of soil impacts to the River.

(ii) Outcomes and Benefits of Reuse Strategy. Redevelopment of the Target Property will consist of 24 new multi-family affordable townhomes ($5,200,000 private leverage) which will increase housing options for the disadvantaged members of the community, which are often housing insecure. Redevelopment of the Target Property will also create 1.3 acres of land suitable for commercial redevelopment. As the closest grocery store is a considerable distance from the Property, commercial reuse is likely to include a grocery store/food co-op, which will further serve disadvantaged members of the community, which are often food insecure. Other commercial uses could include restaurants and “maker-spaces,” which could serve as meeting locations/workshop space to support micro-businesses developed by members of the local community. Commercial redevelopment is estimated to leverage $6,000,000 in private investment. Based on USEIA’s 2021 employment estimates, this redevelopment is estimated to generate 56 construction jobs (5 jobs per $1,000,000 investment), add 75 full-time jobs, and $170,000 in increased tax revenues. The City will require all new construction (both residential and commercial) to incorporate energy efficiency in the building and mechanical designs, with the goal of having all new structures qualify for Leadership in Energy and Environmental Design (LEED) status. A recent study found that buildings constructed to LEED standards contributed 50% fewer greenhouse gases compared to conventional construction1. This increase in energy efficiency is an added benefit of this reuse strategy.

Finally, redevelopment of the Target Property will include remediation/stabilizing 1,500 linear feet of shoreline, which will result in construction of 1.7 acres of new parkland/greenspace and directly tie the Property to the regional bimodal trail network. The greenspace will allow for additional recreational opportunities for disadvantaged members of the community, which often struggle to have equitable access to natural areas. As an added feature, a new kayak launch and fishing pier will be constructed along the shoreline, which will provide disadvantaged members of the community direct access to the Manitowoc River for water recreation activities. These amenities are critical for community health as the current access to the River is by traveling upriver from the marina at the confluence with Lake Michigan (roughly 1.2 miles downstream) or adjacent to a failing retaining wall at a nearby Superfund property.

Cleanup and redevelopment of the Property will have cascading effects to the rest of the Target Area by creating a new and exciting gateway to the River Point District. Additional benefits from the reuse strategy in the Target Area include constructing 5,000 + linear feet of new bimodal trail to link existing city trail to county trail; construct new bus stops and sidewalks; construction of 560,000+ additional square feet of new multi-family residential buildings and construction of 400,000+ square feet of commercial space (estimated leverage $116,000,000 to $250,000,000 in private investment).

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

(i) Resources Needed for Site Reuse. Leverage and coordinated public funding are cornerstones of the Manitowoc brownfields program. The CDA has already leveraged $5,200,000 in local and state funding for acquisition, planning, assessment, and installation of new utilities/rights of way (ROW) adjacent to the Property. This grant will provide a catalyst for securing additional external funds described below. If the CDA cannot pursue funding directly, they will partner with the City and/or developers in pursuit of funding opportunities to facilitate remediation and reuse.

Eligible and Secured – Tax Incremental Financing District (TIF). Perhaps the most important source of funding is TIFs which can be used for environmental cleanup and infrastructure improvements needed to support redevelopment of Brownfield sites. TIF 22 was formed in 2020 with a budget of $112,000,000 specifically for environmental cleanup and infrastructure costs at the Target Property. The City invested $3,500,000 in 2021 for cleanup and utility construction in the Target Area and has budgeted $3,500,000 in 2022 for cleanup and infrastructure construction at the Property. TIF 22 is supplemented by overlapping TIF 16, which has $300,000 per year budgeted for environmental work.

Eligible and Secured - Capital Improvement Program. Redevelopment of the Property will link to $7,000,000 in recent riverfront development investment within the downtown and working harbor. To enhance the walkability in the Target Area, since 2012, the City has replaced defective/deteriorated sidewalks with new concrete walkway along 14.7 miles of roadway at an estimated expenditure of $300,000. To combat blight and reduce crime, the City has installed decorative (underground) street lighting, new concrete curb and gutter and sidewalks, new asphalt pavement, trash receptacles, benches, and trees in portions of the Target Area ($135,000). New bridges/sidewalks were constructed along the Manitowoc River to enhance the walkability in the downtown corridor ($102,000).

Eligible and Secured – Revolving Loan Fund (RLF) Loans. Multiple RLF loans are available to the CDA and future developers to support cleanup/redevelopment of the Target Property. The City of Manitowoc operates a $1,000,000 Brownfield Cleanup RLF capitalized in FY13 by USEPA; $220,000 has revolted and is available for additional cleanup.

1 https://escholarship.org/uc/item/935461rm
Select acronyms: Target Property = Phase I Cleanup Area of the River Point District; CDA = Community Development Authority of the City of Manitowoc; BAC = Brownfield Advisory Committee; RAP/MMP = Remedial Action Plan/Material Management Plan; ABCA = Analysis of Brownfield Cleanup Alternatives; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; blue text are hyperlinks to source material.
Eligible and Pending - State/Fed. The CDA is eligible and will pursue funding from potential sources including, but not limited to Fed. (USEPA, USDA) and State (Wisconsin Eco. Dev. Corp. Site Assessment Grant and Wisconsin Dept of Natural Resources [WDNR] Assessment Monies [assessment]; WEDC [cleanup]; and WDNR [loans/grants]) agencies. Specifically, the grantee is pursuing state funding for construction of amenities in the park (e.g. kayak launch, fishing pier) to be constructed along the River at the Property. Additionally, State cleanup grants require a 30% match, which is impossible to fund internally. This grant could serve as the State-required match for cleanup grant applications submitted by the CDA and/or future private developers to support cleanup work not covered under this grant. Although the Infrastructure Investment and Jobs Act was just enacted, the CDA will track programs as funding becomes available and will seek funding to support redevelopment of Brownfield Properties.

Eligible and Pending – Tax Credits. As demonstrated by several previous successful redevelopments, the CDA will support future private developers in securing tax credits (e.g. HUD Low-income Housing Tax Credit; WEDC Business Development Tax Credit) and other tools to support the proposed residential and commercial redevelopment projects.

(ii) Use of Existing Infrastructure. The cleanup and subsequent redevelopment of the site will use existing infrastructure, including $3,500,000 in new utility and rights of way infrastructure constructed adjacent to the Target Property in 2021. Additionally, redevelopment will leverage recent city-wide infrastructure investments made by the City, including a drinking water Microfiltration Plant upgrade ($3,800,000) and wastewater treatment plant upgrade ($9,000,000) and planning studies described in Section 1.b(i). Additional leverage includes infrastructure investments made by the City, such as expanding utility access and better integration of the complete streets (i.e. bikeable/walkable) concept. A new bus stop will be installed at the property to link the community to the transportation center (located south of the Target Property); therefore, the Site is uniquely located to facilitate transportation options. Future infrastructure investments at the priority brownfield properties will include ~1 mile of new utilities and road/transportation projects, which can be accomplished using WisDOT, local TIF, and/or County CDBG RLF funding. Additionally, this property will leverage $4,600,000 in recently awarded CDBG CLOSE funds for work on nearby City streets. Finally, this project will leverage the $3,000,000 of American Rescue Plan Act of 2021 funds to be invested in new drinking water infrastructure installed in the City. Additional State and Federal infrastructure grants will be sought by the CDA/City.

2.a Community Need and Community Engagement – Community Need

(i) The Community’s Need for Funding. This grant will meet the needs of a community that has an inability to draw on other sources of local funding to carry out investigations due to a small population and low income due to job losses, exacerbated by COVID-19 and limited/restricted State/Local funding.

Key indicators of disproportionately impacted populations summarized on Table 1 reflect a gradual (some punctuated) decline in economic condition since 1970 when manufacturing was the economic foundation in Manitowoc. Specifically, due largely to the collapse of the manufacturing sector, the Target Area experienced a 41% decrease in population, 43% decrease in average income, and 162% increase in the poverty rate, which is why this area is critical. Concurrently, minority populations increased 53-fold and the Latino population is expected to keep growing due to a relatively large percentage of young persons and higher rates of immigration. The Hmong population continues to grow and Asian poverty has tripled since 2009 (data not available for 1970 when manufacturing was the economic foundation). Depressed economic conditions have reduced educational attainment where the high school and college graduate rate in the Target Area is significantly lower than the rest of the City, which could explain why the percentage of households in the Target Area considered cost-burdened is double the rate for the City or County.

<table>
<thead>
<tr>
<th>Table 1. Indication of Community Need</th>
<th>Target Property</th>
<th>City of Manitowoc</th>
<th>Manitowoc County</th>
<th>State of WI</th>
<th>US</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population (change since 1970)</td>
<td>3,843 (-41%)</td>
<td>32,702 (na)</td>
<td>79,185 (-4%)</td>
<td>5.8m (31%)</td>
<td>324.7m (na)</td>
</tr>
<tr>
<td>Percent Poverty Rate (change since 1970)</td>
<td>12.7% (+162%)</td>
<td>14.0% (na)</td>
<td>10.0% (+78%)</td>
<td>11.3% (+83%)</td>
<td>13.4% (na)</td>
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<tr>
<td>Mean Household Income (change since 1970 in 2019 $)</td>
<td>$53,750 (-43%)</td>
<td>$47,861 (na)</td>
<td>$56,612 (-28%)</td>
<td>$61.7k (-22%)</td>
<td>$62.8k (na)</td>
</tr>
<tr>
<td>Percent Minority (change since 1970)</td>
<td>16.1% (+53-fold)</td>
<td>15.5% (na)</td>
<td>9.5% (+28-fold)</td>
<td>18.7% (+4-fold)</td>
<td>39.3% (na)</td>
</tr>
<tr>
<td>Percent Hispanic or Latino (change since 1970)</td>
<td>6.1% (+19-fold)</td>
<td>5.4% (na)</td>
<td>4.0% (+13-fold)</td>
<td>6.8% (+9-fold)</td>
<td>18.0% (na)</td>
</tr>
</tbody>
</table>

4 2015-2019 Data available online with subscription at policymap.com. Data from 1970 per socialesporer.com with a subscription. Target Property is BG5 in CT4.
Select acronyms: Target Property = Phase I Cleanup Area of the River Point District; CDA = Community Development Authority of the City of Manitowoc; BAC = Brownfield Advisory Committee; RAP/MMMP = Remedial Action Plan/Material Management Plan; ABCA = Analysis of Brownfield Cleanup Alternatives; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; blue text are hyperlinks to source material.
Small Population Size: A limiting economic factor is the City’s lack of “entitlement status”; therefore, the City does not receive an annual allocation of CDBG funds that could be a key source of assessment funding. Also, the population is 32,798, so while fairly small is too large to receive USDA brownfield funds.

Loss of Jobs. Manitowoc has experienced many economic challenges over recent decades associated with globalization and its impact on the manufacturing sector which provided the foundation for the City’s prosperity. Rising global competitiveness and off-shoring to reduce labor costs, resulted in major job losses. In the late 1980s, the first major plant closed. The initial economic impact was the loss of $19,000,000 in annual wages and benefits associated with the 1,150 relatively high wage manufacturing jobs. In the past 6 years, the region’s manufacturing base has lost over 7,000 jobs, or 17% of peak employment. Last spring, the region’s higher education sector was dealt a major blow when Holy Family College closed (110 jobs). This continued loss in jobs has resulted in continued decrease in local tax revenue that would otherwise be available to complete the necessary assessments at the Target Property.

Limited State/City Funding. The Wisconsin structural deficit is estimated to be $2 billion through the 2021-2023 budget cycles, which will result in reductions in shared revenue and other State aid to municipalities. State budget was further crippled due to an estimated $300,000,000 in revenue losses due to COVID-19, which will come as cuts to existing programs. Therefore, programs the City could rely on to fund brownfield assessments are more limited than ever.

(ii.1) Threats to Sensitive Populations – Health or Welfare of Sensitive Populations. In the Target Area, there are 1,140 residential parcels within 300 feet of a potential Brownfields in addition to 11 churches, 12 schools/clinics, and 9 daycares, which puts sensitive groups more susceptible to impacts at high risk from brownfields. Further, as noted in Section 2.a.i and further summarized on Table 2, the USEPA Environmental Justice Screening (EJScreen) tool noted the demographic index of the Target Area ranks in the upper 90th percentile compared to the State due largely to the large percentage of low income populations suggesting a high exposure risk to sensitive populations. EJScreen indicates the area ranks in 90th percentile in Wisconsin for low income, linguistic isolation, and education level. As noted on Table 1 in Section 2.a.i, the rate of children in poverty in the Target Area is double the rate of the rest of the County and State, and single mothers with children in the Target Area are nearly guaranteed to be living in poverty. Given that the future earning potential of a female growing up in difficult economic conditions in the Target Area is 30% less than males, multi-generational poverty is difficult to overcome. Further, 20% of people over 65 live in poverty, which is more than double the County rate. The economic condition of children, single mothers, and elderly could explain why 22% of families in the Target Area are receiving SNAP benefits, compared to 8% county-wide. Key welfare issues to the sensitive populations include: lack of affordable and safe/healthy housing; lack of diverse commercial amenities providing jobs and contributing to the community; safety/crime; and access to health foods to combat childhood obesity and enhance the quality of elder living.

Improve Welfare. Assessment and redevelopment of the Target Property for mixed-use commercial/residential and green space will improve welfare conditions by increasing healthy housing, decreasing contaminant source areas, increasing job opportunities in affected neighborhoods, and making the surrounding neighborhoods safe and walkable. Overall well-being will be increased by improvements in nutrition and access to health foods and increased recreation.

(ii.2) Threats to Sensitive Pop. – Greater than Normal Incidence of Disease and Adverse Health Conditions. Asthma. The 2018 National Toxic Release Inventory report by USEPA for the City of Manitowoc indicates a total of

Table 1. Indication of Community Need

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<thead>
<tr>
<th></th>
<th>Target Property</th>
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<th>Manitowoc County</th>
<th>State of WI</th>
<th>US</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent Asian Poverty</td>
<td>14.0% (+3-fold)</td>
<td>29.8% (+3-fold)</td>
<td>27.6% (na)</td>
<td>15.5% (na)</td>
<td>10.9% (na)</td>
</tr>
<tr>
<td>High School Graduate (only)</td>
<td>32%</td>
<td>38%</td>
<td>39%</td>
<td>31%</td>
<td>na</td>
</tr>
<tr>
<td>Bachelor’s Degree or Higher</td>
<td>5.6%</td>
<td>21%</td>
<td>20%</td>
<td>30%</td>
<td>na</td>
</tr>
<tr>
<td>Cost Burdened Households</td>
<td>61%</td>
<td>34%</td>
<td>29%</td>
<td>41%</td>
<td>na</td>
</tr>
<tr>
<td>Housing Units Vacant (for sale/rent)</td>
<td>0%</td>
<td>3%</td>
<td>2%</td>
<td>2%</td>
<td>na</td>
</tr>
<tr>
<td>Single Mothers in Poverty</td>
<td>100%</td>
<td>54%</td>
<td>43%</td>
<td>33%</td>
<td>na</td>
</tr>
<tr>
<td>Child Poverty Rate</td>
<td>35%</td>
<td>21%</td>
<td>14%</td>
<td>15%</td>
<td>na</td>
</tr>
</tbody>
</table>

Table 2. Sensitive Population

<table>
<thead>
<tr>
<th></th>
<th>Target Area (%ile in State)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demographic Index</td>
<td>91</td>
</tr>
<tr>
<td>Low Income</td>
<td>96</td>
</tr>
<tr>
<td>Linguistic Isolation</td>
<td>93</td>
</tr>
<tr>
<td>&lt; HS Education</td>
<td>95</td>
</tr>
<tr>
<td>Under 5 Years Old</td>
<td>71</td>
</tr>
<tr>
<td>People of Color</td>
<td>87</td>
</tr>
</tbody>
</table>

7 https://ejscreen.epa.gov/mapper. RED indicates greater than the 90th Percentile & BLACK indicates greater than 80th Percentile compared to the State of Wisconsin. Select acronyms: Target Property = River Point District Phase I Cleanup Area of the River Point District; CDA = Community Development Authority of the City of Manitowoc; BAC = Brownfield Advisory Committee; RAP/MMP = Remedial Action Plan/Material Management Plan; ABCA = Analysis of Brownfield Cleanup Alternatives; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; blue text are hyperlinks to source material.
3,200,000 pounds of toxic chemical waste was generated at 18 regulated facilities.8 Air quality is significant, and although not available for the Target Area, data from the ALS State of the Air 2020 report gives Manitowoc County an “F” for ozone pollution.9 Undoubtedly, poor air quality has a disproportionate health impact on sensitive populations (Table 3).

### Table 3. Number of Sensitive Population Impacted by Poor Air Quality

<table>
<thead>
<tr>
<th></th>
<th>Pediatric Asthma</th>
<th>Adult Asthma</th>
<th>COPD</th>
<th>Cardiovascular Disease</th>
<th>Children Under 18</th>
<th>Adults 65 and over</th>
<th>Poverty</th>
<th>Total Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact Count</td>
<td>1,371</td>
<td>5,688</td>
<td>3,653</td>
<td>3,545</td>
<td>16,260</td>
<td>16,193</td>
<td>8,124</td>
<td>79,185</td>
</tr>
</tbody>
</table>

**Birth Defects.** Birth defect rates are not available for the Target Area. Wi. Dept of Health County Profile indicates the rate of congenital anomalies in the County is 1.1%, which is double the rate suffered by children in the adjacent county.10

**Overall Health and Cancer Rates.** Although data for the Target Property is not available, the 2020 Population Health Institute at Univ. of Wisconsin11 ranked Manitowoc County 47 out of 72 Counties in Wisconsin for overall health based on characteristics associated with sensitive populations: morbidity (which included self-reported fair or poor health, poor mental health days, and percent of births with low birth weight); social and economic factors (which included measures of education, employment, income, family and social support, and community safety); and physical environment (which included many EJ parameters). Obesity remains a significant challenge in Manitowoc County and Target Area, with 18% of the low-income preschool children considered obese and 31% of the adult population considered obese, which places the County in the highest quartile compared to other counties in Wisconsin. The Wisconsin Department of Health County Profile12 for Manitowoc County indicates the age-adjusted cancer rates for acute lymphocytic leukemia; bladder, brain/CNS, melanoma, and pancreatic cancer; and pediatric acute lymphocytic leukemia are all greater than the State rate. Although the precise cause/source of identified poor health outcomes is likely due to a multitude of factors, known/suspect contaminants of concern identified at the Property are known to cause severe neurological damage and many of the poor health outcomes summarized above. Most directly impacting residences, WDNR issued a fish advisory for the River adjacent to the Property extending to Lake Michigan for polychlorinated biphenyls (PCBs) (which are a constituent at the Property).13 The advisory is critical to the local Hmong (estimated population 1,518)14 where language barriers exist & exposure risk not understood, but fishing is a popular sport. Based on a study in a nearby community, there could be 910 Hmong residents in Manitowoc impacted by the fish advisory.15

Reduction of Health Risk, Cleanup and redevelopment of the Target Property will mitigate these health conditions by decreasing contamination mass and source areas; improving water quality which will result in an increase in the quality of local fisheries; and increasing opportunities for healthy living as summarized in Section 1.b(ii) by creation of bike trails, river access, increased healthy housing; and increased alternative energy/transportation options.

(ii.3) Threats to Sensitive Populations—Promoting Environmental Justice. In combination with zoning, persistent policies and questionable industrial operators have historically disproportionately impacted the community. The City’s legacy of heavy industrial activity and associated pollution has resulted in a disproportionate burden to sensitive populations (women, elderly, children) in this minority-majority neighborhood. Table 4 summarizes disproportionate EJ negative impacts in the Target Area and in a community disproportionately burdened with poor air quality (e.g. National Air Toxics Assessment [NATA]; particulate, and ozone indices), increased risk to children from lead exposure in housing (lead paint indicator), and abundant risks to water quality (risk management plan and wastewater discharge indices).

### Table 4. EJ Index Percentile (BG-5 compared to State) (% in WI with lower risk vs. target neighborhoods)

<table>
<thead>
<tr>
<th>EJ Index</th>
<th>Target Property</th>
</tr>
</thead>
<tbody>
<tr>
<td>EJ Index - NATA Diesel PM</td>
<td>86%</td>
</tr>
<tr>
<td>EJ Index - NATA Air Toxic Cancer Risk</td>
<td>87%</td>
</tr>
<tr>
<td>EJ Index - NATA Respiratory Hazard Index</td>
<td>88%</td>
</tr>
<tr>
<td>EJ Index - Particulate Matter</td>
<td>87%</td>
</tr>
</tbody>
</table>

Sources: USEPA’s Environmental Justice Screening and Mapping Tool (Version 2021; https://ejscreen.epa.gov/mapper/), RED indicates greater than the 90th Percentile & BLACK indicates greater than 80th Percentile compared to the State of Wisconsin.

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9 [https://www.dhs.wisconsin.gov/stats/phprofiles/manitowoc.htm](https://www.dhs.wisconsin.gov/stats/phprofiles/manitowoc.htm)
11 [https://www.dhs.wisconsin.gov/stats/phprofiles/manitowoc.htm](https://www.dhs.wisconsin.gov/stats/phprofiles/manitowoc.htm)
13 [https://dnr.wi.gov/topic/fishing/consumption/](https://dnr.wi.gov/topic/fishing/consumption/)

Access and Food Security: Obesity and food insecurity continue to be significant social justice issues in the Target Area. The density of fast food restaurants in the City of Manitowoc (3.59 per 10,000 population) is one of the greatest in the State of Wisconsin\(^{16}\). Pre-COVID-19 the commercial food distribution network in the community was and continues to be fragile, leaving many community members food insecure. Although data are not available for the target community, the Wisconsin Food Security Project estimates 10% of the population of Manitowoc County are in food-insecure households\(^{17}\). Even more worrisome, the study estimates that 16.1% of children in Manitowoc County are food-insecure, which places the project area in the upper 95% of counties in the State for food-insecurity. This food insecurity was exacerbated during COVID-19 when fresh vegetables became scarce.

Safety Concerns and Increase in Crime: Although crime rates for the Target Area are not available, the 2019 aggravated assault rate (238/100,000) and burglary rate (2,691/100,000) in Manitowoc are greater than the aggravated assault and burglary rates (192/100,000 and 1,564/100,000, respectively) in the rest of the County.\(^{18}\) Non-violent crimes are often less reported, especially by sensitive populations (i.e. minority communities) for fear of retribution.

Lack of Transportation: Very few members of the community utilize public transportation to get to work (ex. 0% in CT-4 compared to 5.1% in the US; 11/10/20 policymap.com). Instead, many walk, which is especially difficult in the winter due to the estimated 42 inches of snow in the City (double US average) and wind chills down to -20°F disproportionately impacting minority populations, who are more likely to walk due to inherent challenges with language (percent who walk and speak English less than “very well” in Manitowoc ~ 33%; WI=5%).

Improved Condition. Cleanup and redevelopment of the Target Property will advance the Path to Achieving Justice\(^{40}\) in the disproportionately impacted community by making a more livable/walkable community to improve air quality by decreasing traffic; improving water quality / fishery quality through shoreline remediation/restoration; increasing access/options to healthy housing; and decrease crime and reducing poverty with economic & commercial opportunities.

2.b Community Need and Community Engagement – Community Engagement

(i) Project Involvement and (ii) Project Roles. The Manitowoc BAC was established 8 years ago and has met to provide significant oversight/input on the City’s highly-successful Brownfields program. BAC members reviewed and provided input on this application. Partners will bring important community voices to the table and were targeted to address needs discussed in Section 2.a. Partners listed on Table 5 affirm their commitment to serve on the BAC. The general public and those affected directly by the Target Property will be engaged through a Community Involvement Plan (CIP) to be developed in Fall 2022 in collaboration with the BAC, as described in 2.b.iii.

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

<table>
<thead>
<tr>
<th>Organization (focus)</th>
<th>Point of Contact</th>
<th>Partner Role / Specific Involvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Chamber of Manitowoc County (economic and business development)</td>
<td>Karen Nichols 920-684-5575 <a href="mailto:knichols@chambermanitowoccounty.org">knichols@chambermanitowoccounty.org</a></td>
<td>Continue to serve on the BAC to facilitate redevelopment of the Site by identifying and finding resources to encourage commercial businesses to locate/build at the Site.</td>
</tr>
<tr>
<td>Progress Lakeshore (housing and business development)</td>
<td>Jamie Zastro Executive Director 920-482-0540 <a href="mailto:jamie@progresslakeshore.org">jamie@progresslakeshore.org</a></td>
<td>Continue to serve on the BAC to facilitate redevelopment of the Site by identifying and finding resources to encourage multi-family residential developers to build at the Site.</td>
</tr>
<tr>
<td>Lakeshore Technical College (job training to fulfill newly created jobs)</td>
<td>James Lemorond Dean – Health and Human Svc. 920-693-1871 <a href="mailto:james.lemorond@gotoltc.edu">james.lemorond@gotoltc.edu</a></td>
<td>Continue to serve on the BAC to assist with community outreach related to welfare/ health concerns and provide for job training opportunities at the College.</td>
</tr>
<tr>
<td>Community Member At Large (housing, food security, child services, social justice)</td>
<td>Mike Huck 920-242-4770</td>
<td>Continue to serve on the BAC to assist and facilitate translation of project materials into Spanish and Hmong and facilitate engagement of minority communities.</td>
</tr>
<tr>
<td>Friends of the Manitowoc River Watershed (watershed group)</td>
<td>James Kettler 920-304-1919; <a href="mailto:jim@lnrp.org">jim@lnrp.org</a></td>
<td>Serve on the BAC to represent stakeholders who recreate on the Manitowoc River.</td>
</tr>
<tr>
<td>USEPA and WDNR Project Managers</td>
<td>To Be Determined - Provide technical assistance and review of work products in Tasks 1, 2, and 3 (e.g. QAPP, SSSAP, RAP/MMP, Construction Documentation Report; financial/status reports).</td>
<td></td>
</tr>
</tbody>
</table>

Select acronyms: Target Property = Phase I Cleanup Area of the River Point District; CDA = Community Development Authority of the City of Manitowoc; BAC = Brownfield Advisory Committee; RAP/MMP = Remedial Action Plan/Material Management Plan; ABCA = Analysis of Brownfield Cleanup Alternatives; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; blue text are hyperlinks to source material.


\(^{17}\) [https://foodsecurity.wisc.edu/](https://foodsecurity.wisc.edu/)

The Director of the Manitowoc County Health Dep. (Stephanie Lambert; 920-683-4155) will attend BAC meetings and community outreach meetings and to answer any health related questions/concerns related to the cleanup.

(iii) Incorporating Community Input. The cornerstone of the City’s Brownfields Program is enhancing public education/communication through continued workshops, resident questionnaires, and web-based engagement. Community involvement in the decision-making process at the Target Property began several decades ago and continued through development of the Manitowoc Comprehensive Plan and cultivated in the recent development of The North Central River District Redevelopment Plan and additional Plans described in Section 1. Within one month of award, the CDA will develop a site-specific CIP to leverage the expertise and networks of the BAC (members listed in 2.b(i)). The CIP will be designed specifically to engage and inform the community members and to provide an avenue for input/feedback from the community. The CIP will also discuss how community input will be considered and responded to. The approved CIP will be implemented in Fall 2022 to integrate community involvement utilizing the BAC to engage the community and local businesses in the assessment, cleanup, and overall redevelopment of the Target Property. The timeline for community meetings will be outlined in the CIP. The CDA will hold at least one meeting per quarter at key points during the project, including: (A) a meeting after grant award to discuss the project/grant with the community to discuss the process/what they can expect and timeframe of key activities; (B) a meeting when the final Analysis of Brownfield Cleanup Alternatives (ABCA) is posted; (C) a meeting when cleanup activities begin; (D) multiple meetings periodically during active cleanup; and (E) a final meeting when cleanup is complete.

The North Central River District Redevelopment Plan represents a yearlong planning and reuse effort at the Property, which has included a variety of community involvement activities until the COVID-19 pandemic began. Since that time, outreach meetings have used online meeting platforms (e.g. Zoom or Microsoft Teams). Virtual tools have worked extremely well in the past to connect citizens to City-led brownfield redevelopment projects. The CIP will include a variety of socially-distant engagement practices, including expanding virtual tools (e.g. online meeting platforms, social media, and webpage/email updates). Project information will continue to be shared by the Mayor during his routine local radio show. Spanish speakers will be reached through the local Spanish radio station and translated materials provided through local retailers (e.g. grocery stores). As renderings are developed, the local newspaper will likely be a significant source of information dissemination. Displays of Property renderings at the summer farmer’s market allows socially-distant feedback.

It is anticipated that most project communications will be in English. However, as the brownfield redevelopment project is likely to affect residents with Spanish and/or Hmong as their first language, translations of project materials will be developed in coordination with the BAC. Radio announcements will be made on local Spanish radio stations FM92.7, AM750, AM640, and AM1510. In addition, representatives of the local Spanish and Hmong newspapers will be invited to attend each meeting and will be provided with informational materials for each meeting. Printed materials will be placed in locations in the neighborhoods frequented by these target groups (community centers, ethnic grocery stores, farmer’s markets, laundromats, churches, large retail outlets [e.g. Walmart, Lowes, Menards]).

After the pandemic ends, in-person outreach will resume. Community meetings will be held in the evenings to accommodate work schedules of stakeholders. In addition, meetings will be held at a location served by the mass transit system and within walking distance of the target neighborhoods. The meeting facility will be ADA compliant to accommodate needs of sensitive populations (i.e. disabled or elderly). Hard copies of all project outputs will be made available at City Hall to ensure access to stakeholders.

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

Contaminated Media to be Addressed: As summarized in work completed to date, hazardous substances (e.g. VOCs, PAH, PCBs and heavy metals) were detected in soil/fill at the Property at concentrations significantly greater than applicable health-based ch. NR 720 WAC Direct Contact and Soil to Groundwater Residual Contaminant Levels. Impacts appear to be associated with historic releases from former industrial operations and/or the placement of a large quantity (estimated 48,400 cubic yards) of impacted historic granular fill on the Property. As noted below, hazardous substance impacts to groundwater will be managed with institutional controls/continuing obligations established in this grant.

Cleanup Method: Following completion of the waste characterization sampling of soil to confirm appropriate offsite disposal options, a formal RAP/MMMP will be prepared and submitted to WDNR for concurrence on the proposed cleanup at the Site. The RAP/MMMP will describe plans to reuse as much existing soil/fill onsite as practical and will describe the methods to cleanup areas to facilitate non-industrial reuse. The selected remedial approach to be completed by appropriately licensed/certified remedial contractors, with work overseen by the Qualified Environmental Professional (QEP) and regulatory agencies (USEPA and WDNR) under this grant will likely include: (1) Limited excavation, transportation, and offsite disposal of soil (estimated 3,515 cubic yards) with significant heavy metal, VOC, PAH

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and/or PCB impacts that is not suitable for beneficial reuse onsite; (2) Construction of a vegetated soil engineered barrier/cap outside of the multi-family building footprint(s) in the former railroad turntable/engine house and bulk petroleum storage areas to mitigate the potential for direct contact with residual soil impacts and reduce the risk for mobilization of soil impacts to groundwater; (3) Construction of a vegetated soil engineered barrier/cap (estimated 1.3 acres in size) per WDNR requirements/specifications along 1500 linear feet of shoreline on the Manitowoc River to stabilize the shoreline while mitigating the risk for direct contact with impacted soil/fill in the riverbank, reducing the risk of mobilization of soil/fill impacts to the river through stormwater runoff, and reducing the potential for leaching of residual impacts to groundwater; and (4) Establishing institutional controls/continuing obligations and maintenance plans to provide for long-term control of residual soil and groundwater impacts.

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

3.b.i – 3.b.iv Task Descriptions, Cost Estimates, and Measuring Progress – Description of Tasks/Activities and Outputs. The CDA has developed the appropriate tools and procedures to immediately begin implementation of this grant and execute key project activities within the performance period. The CDA is the current owner of the Target Property, therefore an access agreement is not needed. As such, the CDA is able to begin work immediately.

<table>
<thead>
<tr>
<th>Task 1 - Activity: Program Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation: Procure QEP; Prepare Quarterly Reports, Annual Financial Reports, and MBE/WBE Reports; Update ACRES; Grant Closeout Report</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: QEP procured by the time the Cooperative Agreement is issued (October 1, 2022). Quarterly progress reports will be submitted by January 30th, April 30th, July 30th, and October 30th of each year, with the first due on January 30, 2023. Annual DBE reports will be submitted by October 30th of each year, with the first due on October 30, 2023. Grant closeout report expected Q1 FY2025, or no later than October 30, 2025</td>
</tr>
<tr>
<td>iii. Task/Activity Leads: CDA Project Manager and Project Coordinator (with input from QEP once retained)</td>
</tr>
<tr>
<td>iv. Outputs: Administrative Records; QEP Procurement Documentation; (12) Quarterly Reports; (2) Annual Financial Reports; (2) MBE/WBE Reports; (1) Grant Closeout Report</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 2 - Activity: Cleanup</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation: Finalize ABCA; adapt existing QAPP for use on the project; prepare and implement a SSSAP for waste characterization soil sampling to confirm appropriate offsite disposal options; develop waste profiles; prepare RAP/MMP; develop bid spec, retain remedial contractor, and implement cleanup plan described in Section 3.a; prepare construction documentation report; and develop institutional controls.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: Finalize ABCA, Prepare QAPP, Prepare SSSAP. Complete waste characterization soil sampling to confirm appropriate offsite disposal options (Q1-Q2 FY2023); Prepare waste profile and RAP/MMP for WDNR approval (Q2 FY2023); develop bid spec, retain remedial contractor, and implement cleanup plan (Q3 FY2023-Q1 FY2024); Prepare construction documentation report and develop institutional controls (Q2-Q4 FY2024).</td>
</tr>
<tr>
<td>iii. Task/Activity Leads: QEP and CDA Project Manager, with input WDNR and USEPA PMs</td>
</tr>
<tr>
<td>iv. Outputs: QAPP; SSSAP; Waste Profile; RAP/MMP; bid documents; Construction Documentation Report; Institutional Controls</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 3 - Activity: Community Outreach</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation: Prepare and implement a Site-Specific CIP. Activities will likely include hosting public meetings to discuss Site cleanup and redevelopment plans; attending community events; development of outreach materials.</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: First meeting Q1 FY23, then quarterly through grant performance period</td>
</tr>
<tr>
<td>iii. Task/Activity Leads: CDA Project Manager and BAC, with input from QEP</td>
</tr>
<tr>
<td>iv. Outputs: (1) CIP; meeting deliverables for 12 meetings, sign-in sheets, handouts, fact sheets</td>
</tr>
</tbody>
</table>

3.c Task Descriptions, Cost Estimates, and Measuring Progress – Cost Estimates. Descriptions and budget justifications below are based on costs incurred by the City during a similar brownfield cleanup project. By State statute and local ordinance, the City of Manitowoc Department of Community Development serves as the fiduciary and managing agent of the CDA (the grant applicant). Personnel costs below reflect City staff time and are a combination of labor ($38/hr) + fringe ($12) = $50 (average).
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<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1</th>
<th>Task 2</th>
<th>Task 5</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Program Management</td>
<td>Cleanup</td>
<td>Community Outreach</td>
<td></td>
</tr>
<tr>
<td>Direct Costs</td>
<td>$8,208</td>
<td>$3,800</td>
<td>$5,472</td>
<td>$17,480</td>
</tr>
<tr>
<td>Personnel</td>
<td>$2,592</td>
<td>$1,200</td>
<td>$1,728</td>
<td>$5,520</td>
</tr>
<tr>
<td>Fringe</td>
<td>$6,000</td>
<td>$558,050</td>
<td>$5,500</td>
<td>$569,550</td>
</tr>
<tr>
<td>Supplies</td>
<td>$2,450</td>
<td>$2,450</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contractual</td>
<td>$5,000</td>
<td>$5,000</td>
<td></td>
<td></td>
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<tr>
<td>WDNR Fees</td>
<td>$0</td>
<td>$0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Direct Costs</td>
<td>$16,800</td>
<td>$568,050</td>
<td>$15,150</td>
<td>$600,000</td>
</tr>
<tr>
<td>Total Indirect Costs</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Total Federal Funding</td>
<td>$16,800</td>
<td>$468,050</td>
<td>$15,150</td>
<td>$500,000</td>
</tr>
<tr>
<td>Cost Share (TIF 22)*</td>
<td>$100,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL BUDGET</td>
<td>$16,800</td>
<td>$568,050</td>
<td>$15,150</td>
<td>$600,000</td>
</tr>
</tbody>
</table>

*Cost Share: The CDA will meet the 20% cost share by with $100,000 of TIF 22 funds (see Attachment A.)

Task 1: Program Management – ($16,800). Personnel Costs of $10,800 is budgeted for an estimated 216 hrs of work by Manitowoc PM and staff to manage the cooperative agreement as follows: procure QEP and manage QEP activities (4h/mo=144hr), preparation of quarterly reports and maintenance of the ACRES database (3hr/quarter = 36hr), annual financial and disadvantaged business enterprise reporting (8hr/yr = 24hr), prepare grant closeout report (12h). Contractual Costs of $6,000 are budgeted for an estimated 48 hrs (@ $125/hr) of work by QEP in providing assistance in completing various required reports. Task 1 is 3% of the budget.

Task 2: Cleanup – ($468,050). Personnel Costs of $5,000 are budgeted for an estimated 100 hours of work by Manitowoc PM and staff for developing and issuing bid specs (40h); reviewing project deliverables (20h); and coordination during onsite field work (40h). WDNR regulatory oversight fees for reviewing project deliverables is $5,000. Contractual QEP costs (432h @ $125/hr = $54,000) include adapting the existing QAPP for use on the project, develop and implement a SSSAP for waste characterization soil sampling to confirm appropriate offsite disposal options, and developing soil waste profiles (48h); finalizing ABCA and preparing a Remedial Action Plan / Material Management Plan (52h); field oversight of remediation activities (240h); prepare a Construction Documentation Report (52h); and develop institutional controls (40h). Drilling and laboratory subcontractor costs are estimated to be $4,451. Remedial contractor costs ($499,599) include excavation and offsite disposal of 3,515 cubic yards (yd3) of impacted soil (@$81/yd3), constructing a vegetated soil engineered barrier/cap across 1,500 linear feet of shoreline (56,628 square feet [sf] @$3/sf), and constructing a vegetated soil engineered barrier/cap at the multi-family redevelopment area (15,000 ft2 @$3/sf).

Task 3: Community Outreach – ($15,150). Personnel Costs of $7,200 are budgeted for an estimated 144 hrs of work by Manitowoc PM and staff (12h/quarter @ $50/hr) for planning/hosting 4 outreach activities per year. Supply Costs of $2,450 are budgeted for printing costs ($1,500) and mailing costs for public notices ($950). Contractual Costs of $5,500 are budgeted for an estimated 44 hrs of work by the QEP (@$125/hr) to prepare a site-specific CIP and assist with outreach activities. Task 3 is 2% of the budget.

Project results/outputs and outcomes will be tracked and progress measured/evaluated weekly using existing tools developed by the grant applicant and summarized in quarterly progress reports and annual financial reports prepared during the project under Task 1. Project outputs, progress, and schedule will be tracked continuously to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of the community. For measuring/evaluating progress, outputs will be compared to the project schedule proposed in Section 3(b); 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 leveraging resources will further be tracked on a monthly/quarterly basis in the ACRES database to further measure progress. Overall project outcomes will be tracked/quantified in the final progress report by comparing future community demographics/welfare characteristics to current conditions and will include: (1) increase in shovel-ready portions of the property suitable for commercial/retail redevelopment to increase jobs and attract outside businesses, (2) increased greenspace to connect multi-modal trails, and (3) increase residential housing options to support rebuilding the downtown commercial district. If the timelines for advancing 1 or more phases of work at the Target Property are not well aligned with the USEPA grant project period, then the CDA and QEP will work with WDNR/EPA to adjust the approach to maintain progress on achieving the project outcomes. Outcomes will be tracked long term on a 5-year basis by the CDA and reported in future brownfield conferences/fact sheets/City website.
4.a Programmatic Capability and Past Performance – Programmatic Capability

(i) Organizational Structure. By State statute and local ordinance, the City of Manitowoc Department of Community Development serves as the fiduciary and managing agent of the CDA, the grant applicant. This grant will be managed by the same high-performing team of City staff members who established the City’s Brownfields program over a decade ago and are currently involved with management and implementation of the FY21 USEPA Coalition grant and the previous FY18 USEPA SSA and FY15, FY18 USEPA CWA grants. The CDA has internal procedures and experience to retain a QEP per the requirements of 2 CFR 200.317 - 200.326 prior to execution of the Cooperative Agreement. The City Finance Department will provide financial tracking and grant documentation support to ensure that grant requirements are met. The CDA will also use the expertise of the BAC, City, WEDC, and USEPA to provide guidance and marketing to support use of grant funds to promote reuse of the Target Property.

(ii) Description of Key Staff.

Mr. Adam Tegen, Executive Director to the CDA and the Community Development Director of the City of Manitowoc, will function as the Brownfield Project Manager for this project and will be responsible for project performance and coordination with USEPA/WDNR. Mr. Tegen has served in planning, zoning, and economic development for over 20 years as a municipal staff member, and as the Executive Director to the CDA and Community Development Director for the City of Manitowoc. Mr. Tegen leads all brownfield and economic development efforts in Manitowoc. Mr. Tegen currently serves as the project manager for the City’s FY21 Coalition Assessment Grant and served as the project manager for the CDA’s highly successful FY18 USEPA SSA and the City’s high performing FY18 USEPA CWA and FY13 RLF grants. Critical to the proposed cleanup project, Mr. Tegen is the CDA’s lead on redeveloping the River Point District. In this role, Mr. Tegen established a successful TIF 22, which funded $3,500,000 in new public infrastructure in the first year at the River Point District. To support this investment, Mr. Tegen secured $400,000 in additional state brownfield assessment funds and assisted a private developer secure $250,000 in state brownfield cleanup funds to support their $18,000,000 multi-family housing unit under construction.

Mr. Paul Braun, City Planner, will function as the Brownfield Project Coordinator for this project and will coordinate work with the QEP and other City departments. Mr. Braun has provided oversight and management of the current FY21 USEPA Coalition ($600,000), high performing FY13, FY15, FY18 USEPA CWA grants ($1,100,000), FY18 USEPA SSA grant ($200,000), State brownfield grants ($1,200,000) and the FY13 USEPA Brownfield RLF grant ($1,000,000). In this role, Mr. Braun verified compliance with all reporting and financial responsibilities for the CDA and the City and is credited for successfully meeting all USEPA (and State) milestones. During the past five years, Mr. Braun has directly managed/overseen/coordinate implementation of over $5,000,000 in grant-funded projects; including the above grants and State of Wisconsin Coastal Management Grants. In the event of future personnel turnover, the planned “team” approach will prevent any interruptions with the implementation of the project. Mr. Braun has been involved in daily grant operations for the previously funded USEPA grants and will become familiar with the new grant operations so he can immediately step in as either interim or replacement project manager in the case of loss/ reassignment of the active Project Manager, Mr. Adam Tegen. Mr. Tegen and Mr. Braun will capitalize on the expertise of three additional key City staff members including a GIS Specialist, a Planner, and an administrative support.

(iii) Acquiring Additional Resources. The CDA has internal procedures and experience to retain a QEP per the requirements of 2 CFR 200.317 - 200.326 prior to execution of the Cooperative Agreement to perform the environmental assessment tasks. If needed, additional contractors can be procured following these methods. The CDA will utilize the expertise of the BAC and community input, to provide additional guidance on use of grant funds to complete the project.

4.b(i) Past Performance and Accomplishments – Previously Received an EPA Brownfields Grant.

i) USEPA Site-Specific Brownfield Assessment Grant for Hazardous Substances (FY18; $200K SSA)

1. Accomplishments: The CDA accomplished more than required in the Site-Specific Assessment (SSA) grant workplan ahead of schedule. The CDA used the SSA to complete an extensive sitewide Phase II ESA at the site followed by 4 supplemental Phase II ESAs in discrete focus/source areas. WDNR used the results from this SSA to identify a financially responsible party who completed the assessment work in 2021 by delineating the extents of impacts identified in the SSA, which is a major outcome of the project. Cleanup and redevelopment as a multi-tenant affordable/worker housing development is scheduled for 2022-2023. Achievements are accurately reflected in ACRES.

2. Compliance with Grant Requirements: The CDA maintained compliance with the workplan/schedule and the terms/conditions of the cooperative agreement. The CDA submitted the required annual financial reports, quarterly reports, and project deliverables in a timely manner per the workplan and cooperative agreement schedule. The CDA kept the ACRES database up to date during the grant performance period. The closeout report was submitted ahead of schedule. No funds remained when the final report was submitted.
Attachment B
Threshold Criteria Responses
ATTACHMENT B: THRESHOLD CRITERIA RESPONSES

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

1. Applicant Eligibility

The Community Development Authority (CDA) of the City of Manitowoc, Wisconsin (the grant applicant and current property owner) is a quazi-governmental entity that operates under the supervision and control of, and as an agent of, the City of Manitowoc, Wisconsin, which is a “general purpose unit of local government” as that term is defined in 2 CFR 200.64. Therefore, the Community Development Authority of the City of Manitowoc is eligible to receive a USEPA cooperative assistance agreement.

The Community Development Authority of the City of Manitowoc consists of seven resident/citizen Commissioners appointed by the Mayor with confirmation from the Manitowoc Common Council. The Community Development Authority of the City of Manitowoc has powers, duties and functions set out in Section 66.1335 of the Wisconsin Statute for housing and redevelopment authorities. Duties of the Community Development Authority include blight elimination, slum clearance, urban renewal, and redevelopment.

2. Previously Awarded Cleanup Grants

The proposed site has not received funding from a previously awarded USEPA brownfields cleanup grant.

3. Expenditure of Existing Multipurpose Grant Funds

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

4. Site Ownership

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

5. Basic Site Information

Name of the Site: Phase I Cleanup Area of the River Point District
Address of the Site: Intersection of North 11th Street and Buffalo Street; Manitowoc, WI 54220
Current Owner of the Site: CDA (the grant applicant)
6. Status and History of Contamination at the Site

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

(b) Operational History and Current Use of the Site: The Phase I Cleanup Area subject to this grant consists of all or portions of 11 contiguous historic industrial parcels of land owned by the CDA totaling approximately 8.1 acres and forming the southeast portion of the larger 21-acre former railroad/industrial peninsula referred to locally as the “River Point District”.

The River Point District appears undeveloped in 1835; however, the proximity of the peninsula to the Lake Michigan/Great Lakes shipping route facilitated initial large scale industrial transloading development of the River Point District by 1868. Transloading operations on the peninsula in the late 19th Century included largescale coal, lumber/mills, grain, and large warehouses. The following describes identified prior uses within the Phase I Cleanup Area.

The southern and eastern portions of the Phase I Cleanup Area operated as the Carl Zander Planing Mill and Factory from ~1870 through 1895 and included various areas of lumber storage and processing areas on the Property, along with an office along North 10th Street. The Manitowoc Boat Club constructed several boat houses adjacent to the Manitowoc River by 1887 near the center of the Property. As illustrated on historic Sanborn® Fire Insurance Maps drawn in the late 19th Century, the southern/western portions of the Phase I Cleanup Area were once beneath the Manitowoc River. Placement of fill in the late 19th Century on the Phase I Cleanup Area and nearby areas altered the bank of the Manitowoc River to its current location prior to acquisition of the River Point District by the Western Railroad Company on July 22, 1895. The majority of the Phase I Cleanup Area was developed for railroad use by 1895 and remained in railroad use through most of the 20th Century (Stantec, 2019). Key features included multiple spur lines/ferry loading area/sheds/maintenance areas (ex. tool house and wash house).

The northern portion of the Phase I Cleanup Area was used for lumber storage and occupied by a blacksmith shop by 1893. Per Stantec (2019), a junk yard/metal scrap yard was constructed on and occupied the majority of the northern portion of the Phase I Cleanup Area by 1900 and appears to have remained in operation through the latter portion of the 20th Century. Orthophotography indicates the junk yard was asphalt paved between 2000 and 2006.

The central and western portions of the of the Phase I Cleanup Area was largely vacant in the 19th Century but included a small storage area from 1883 through 1887. The area was developed for railroad use by 1895, including a cinder pit, railroad roundhouse, turntable, coal shed, and multiple spurs/tracks. A grain elevator was also constructed between 1894 and 1900, with expansion between 1900 and 1919. As noted in Stantec (2021d), the grain elevator fell into disrepair in the late 20th Century and was ultimately demolished in 2001.
As described in the Stantec (2019) Phase I ESA and the Stantec (2021e) Analysis of Brownfield Cleanup Alternatives (ABCA), the property appears undeveloped in 1835. Historic records indicate the Parcel was transferred from the Manitowoc Terminal Company to the Manitowoc and Western Railroad Company on July 22, 1895, which is consistent with railroad development in the late 19th Century. Assessor records suggest the property was later transferred to the Soo Line Railroad Company and ultimately transferred to the current owner (Wisconsin Central Limited) sometime during the latter half of the 20th Century. In addition to railroad use during the 20th Century, larger portions of the property were leased to industrial tenants for bulk coal transloading/storage, petroleum storage, ship building, grain storage/elevator, metal/scrap/junk yard, and transloading of stone along the southern portion of the Property. Railroad use of the Site ceased in the 1980s and the Site was decommissioned in the 2000s.

The CDA began due diligence investigations in Fall 2018, acquired the Site on April 12, 2019, and completed an extensive Phase II ESA in early 2020. Work completed in summer 2020 included removal of remaining oil house and warehouse slabs in combination with continued subsurface investigations. Assessment work completed to date is summarized in the following subsection.

The Phase I Cleanup Area is currently vacant/abandoned, with no structures or building slabs remaining onsite. The City of Manitowoc began construction of new rights of way within and adjacent to the Phase I Cleanup Area in 2021.

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

- REC 1: Prior Railroad Use
- REC 2: Prior Industrial Use
- REC 3: Residual Impacts to Soil and Groundwater
- REC 4: Apparent Anthropogenic Fill
- REC 5: Storage/Dumping by Adjacent Property Owners
- REC 6: Residual Impacts to Soil and Groundwater from Nearby Properties

The CDA continued environmental assessment activities at the Phase I Cleanup Area following acquisition, with work documented in the following keystone reports:

- Stantec, 2020a, Phase II Environmental Site Assessment, Riverpoint District; Manitowoc, Wisconsin, March 23, 2020.
- Stantec, 2020b, Phase II Environmental Site Assessment, River Point District; Manitowoc, Wisconsin, 200 North 10th Street (Site 1), August 24, 2020.
Attachment B – Threshold Criteria Responses
EPA Brownfields Cleanup Grant Application – River Point District Phase I Cleanup Area (FY2022)

- Stantec, 2020e, Phase II Environmental Site Assessment, River Point District; Manitowoc, Wisconsin, Site 3, December 18, 2020.
- Stantec, 2021a, NR716 Site Investigation Report, River Point District Phase 1 Construction Area; Manitowoc, Wisconsin, July 18, 2021.
- Stantec, 2021c, Supplemental Site Investigation at the River Point District; Manitowoc, Wisconsin, September 10, 2021.
- Stantec, 2021d, Fire Department Response During Explosive Demolition of a Former Grain Elevator, 1101 Buffalo Street, River Point District – Phase I Construction Area; Manitowoc, Wisconsin, September 7, 2021.
- Stantec, 2021e, Analysis of Brownfield Cleanup Alternatives, Phase I Cleanup Area, River Point District, Manitowoc, Wisconsin, October 29, 2021.

As documented in previous Stantec reports (2020a through 2020e, and 2021a through 2021e), residual soil and groundwater impacts associated with prior commercial/industrial use and placement of historic fill are present and will complicate redevelopment, as summarized below.

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

Groundwater. The potentiometric surface of shallow groundwater decreases in a radial manner towards the Manitowoc River, which serves as a constant head boundary for groundwater. Select VOCs, PAHs, and/or dissolved heavy metals were detected in groundwater in the Phase I Cleanup Area at concentrations greater than applicable ch. NR 140 WAC (NR 140) Preventive Action Limits (PALs) and/or Enforcement Standards (ESs).

Vapor. The Property is currently vacant. Therefore, the vapor intrusion pathway cannot be quantitatively evaluated at this point. However, soil and/or groundwater with residual VOC impacts may extend beneath areas of proposed commercial redevelopment in the Phase I Cleanup Area. Depending on final reuse plans and building alignments, residual VOC impacts could pose a threat to indoor air quality due to vapor intrusion.

As discussed in the Stantec (2021e) ABCA, Remedial action activities to be funded in this grant are warranted to facilitate redevelopment at the Property and include:

- Limited excavation and offsite disposal of soil with heavy metal, VOC, PAH and/or PCB impacts;
• Construction of an engineered soil barrier along the Manitowoc River to mitigate the risk for direct contact with impacted soil/fill, reduce the risk of mobilization of soil/fill impacts to the river through stormwater runoff, and reduce the potential for leaching of residual impacts to groundwater; and

• Establishing institutional controls/continuing obligations and maintenance plans to provide for long-term control of residual soil and groundwater impacts.

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

7. Brownfield Site Definition

Site is real property, the expansion, redevelopment, or reuse of which is being complicated by the presence or potential presence of hazardous constituents associated with previous Site operations. Per CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and Appendix 1, the property targeted for this site-specific assessment is (a) not listed or proposed for listing on the National Priorities List; (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

Following acquisition, the CDA continued environmental assessment activities at the Phase I Cleanup Area following acquisition, with work documented in the following keystone reports:

• Stantec, 2020a, Phase II Environmental Site Assessment, Riverpoint District; Manitowoc, Wisconsin, March 23, 2020.
• Stantec, 2020b, Phase II Environmental Site Assessment, River Point District; Manitowoc, Wisconsin, 200 North 10th Street (Site 1), August 24, 2020.
• Stantec, 2020e, Phase II Environmental Site Assessment, River Point District; Manitowoc, Wisconsin, Site 3, December 18, 2020.
• Stantec, 2021a, NR716 Site Investigation Report, River Point District Phase 1 Construction Area; Manitowoc, Wisconsin, July 18, 2021.
• Stantec, 2021c, Supplemental Site Investigation at the River Point District; Manitowoc, Wisconsin, September 10, 2021.
• Stantec, 2021d, Fire Department Response During Explosive Demolition of a Former Grain Elevator, 1101 Buffalo Street, River Point District – Phase I Construction Area; Manitowoc, Wisconsin, September 7, 2021.
• Stantec, 2021e, Analysis of Brownfield Cleanup Alternatives, Phase I Cleanup Area, River Point District, Manitowoc, Wisconsin, October 29, 2021.

9. Enforcement or Other Actions

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

10. Sites Requiring a Property-Specific Determination

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

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

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

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

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

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

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

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

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

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

(e) PCB Release Subject to Remediation Under TSCA: None known.
Assistance for Response Activity at the Site has Been Obtained for A Portion of the Site under Subtitle I of the SWDA from the LUST Trust Fund Established under Section 9508 if the IRS Code 1986: No portions are known.

11. (a) Threshold Criteria Related to CERCLA

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

11.a.ii.(1) Bona Fide Prospective Purchaser Liability Protection

a. Information on Property Acquisition

i. The Community Development Authority of the City of Manitowoc acquired the property through a negotiated purchase with the previous owner (Wisconsin Central Ltd) on April 12, 2019 for the purpose of blight elimination.

ii. The CDA acquired the property on April 12, 2019

iii. The nature of ownership is fee simple

iv. The CDA acquired the property from Wisconsin Central, Ltd.

v. No records have been identified indicating the Community Development Authority of the City of Manitowoc was affiliated or related to prior owners or operators through familial, contractual, corporate, or financial relationships.

b. Pre-Purchase Inquiry

i. A Phase I ESA was completed by Stantec (2019) per the All Appropriate Inquiries rule detailed in 40 CFR §312.21 utilizing ASTM E1527-13 on behalf of the current owner (The Community Development Authority of the City of Manitowoc) on March 21, 2019. The current owner acquired the property on April 12, 2019 for the purpose of blight elimination and secured a liability exemption for local governmental units (LGUs) from WDNR per ch. 292.11(9) of the Wisconsin Administrative Code. A Phase II ESA was completed pre- and post-acquisition (Stantec, 2020) and assessment work has continued through 2021 (see response to Item 8, previously)

ii. The Stantec (2019) Phase I ESA was completed by registered Professional Engineers, Professional Geologists, and environmental professionals
(collectively ‘qualified environmental professionals’) as those terms are defined and required per § 312.10 of 40 CFR 312.

iii. The Phase I ESA was completed on March 21, 2019 and ownership transfer occurred on April 12, 2019. Therefore, the Stantec (2019) Phase I ESA is considered valid for the purpose of establishing CERCLA liability defense.

c. Timing and/or Contribution Toward Hazardous Substances Disposal. Disposal of all hazardous substances at the site occurred before the property was acquired by the Community Development Authority of the City of Manitowoc. The current owner has not caused or contributed to any release of hazardous substances at the site. Further, the current owner has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

d. Post-Purchase Uses. The CDA began construction of new rights of way adjacent to the Phase I Cleanup Area. However, no structures are present in the Phase I Cleanup Area. No sources of ongoing releases are known to remain on the Site. The CDA is in the process of inventorying and removing remaining de-minimis quantities of restricted wastes, demolishing/removing the remaining building slabs, and confirming/repairing engineered barriers.

e. Continuing Obligations. The following provides a summary activities conducted after acquisition related to continuing obligations.

i. Stop continuing releases. As summarized in the Stantec (2020) Phase II ESA, a geophysical survey was conducted at the Site prior to the subsurface investigation. No anomalies consistent with underground storage tanks were identified and no aboveground storage tanks are apparent. In addition, the City removed the remaining concrete building slabs associated with historic oil houses to further confirm no tanks remain (Stantec, 2021c and 2021d). Therefore, all potential sources of releases appear to have been removed prior to acquisition of the Site by the grant applicant. As such, no sources of ongoing releases are known to remain on the Site. Therefore, the CDA has taken all reasonable steps to identify and stop continuing releases.

ii. Prevent threatened future release. As noted above, all potential sources of releases appear to have been removed prior to acquisition of the Site by the grant applicant. As such, no sources of threatened future release are known to exist on the Site. The Site is secured and City police and building inspection staff drive by the Site during regular patrols to prevent illicit dumping. Therefore, the CDA has taken all reasonable steps to identify and prevent a threatened future release.

iii. Prevent or limit exposure to previously released hazardous substances. The CDA is maintaining compliance with existing activity use limitations and institutional controls. The Site is secured and City police and building inspection staff drive by the Site during regular patrols to prevent illicit
dumping. Therefore, the CDA has taken all reasonable steps to limit exposure to previously released hazardous substances.

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

12. Cleanup Authority and Oversight Structure

a. The Phase I Cleanup Area is enrolled in the Wisconsin Department of Natural Resources (WDNR) Environmental Repair Program (ERP) and is being tracked in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) under case number 02-36-585491. All subsurface environmental assessment work completed at the Site to date (i.e. Stantec 2020a-e and 2021a-e) has been reviewed by the WDNR project manager. WDNR will provide oversight of the cleanup proposed under this grant to ensure that the project protects human health and the environment. The CDA will retain the services of a qualified environmental professional and remedial contractor per the requirements of 2 CFR 200.317-200.327 to design, oversee, and execute onsite remedial work.

b. As described in the Stantec (2021e) ABCA, the proposed cleanup will not directly impact adjacent or neighboring properties.

13. Community Notification

a. Draft ABCA. The Stantec (2021e) ABCA was prepared on October 29, 2021 and made available for public comment on November 1, 2021.

b. Community Notification Ad. The applicant published a community notification ad in the local newspaper on November 1, 2021.

c. Public Meeting. A public meeting was held to discuss the draft application and consider public comments. The meeting was held on November 17, 2021.

d. Community Notification Documents. Per the grant guidelines, the following is attached:

- The draft Stantec (2021e) ABCA (Attachment B1)
- A copy of the newspaper ad (Attachment B2)
- A summary of the comments received (Attachment B3)
- The applicant’s response to those public comments (Attachment B4)
- Meeting notes or summary from the public meeting (Attachment B5)
- Meeting sign-in sheet/participant list (Attachment B6)
14. Statutory Cost Share

The grant applicant is not seeking a waiver to the cost share requirement. If the application is successful, the grantee will provide a cost share that is calculated as 20% of the total federal cleanup funds awarded. The estimated cost share is $100,000 and will be provided through TIF 22 funds approved as part of the City budget to support eligible costs, as detailed in the project narrative.

15. Waiver of the $500,000 Limit

The grant applicant is not seeking a waiver to the $500,000 limit.

16. Named Contractors and Subrecipients

a. Contractors. n/a; a contractor has not been named in this grant proposal
b. Subrecipients. n/a; a subrecipient has not been named in this grant proposal.