

IMPLEMENTATION WORK PLAN
United States Environmental Protection Agency Cooperative Agreement for a Brownfield
Community-Wide Assessment Grant

Grant Recipient: City of Manitowoc, Wisconsin
June 17, 2025

City of Manitowoc
900 Quay Street
Manitowoc, WI 54220

Project Contact:

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Project Period: **July 1, 2025 – September 30, 2029**

66.818; Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup
Cooperative Agreements

EPA-OLEM-OBLR-24-08, FY25 Guidelines for Brownfield Assessment Grants (Community-
Wide Assessment Grants)

**The activities funded under this announcement support Pillar 1: Clean Air, Land, and Water for
Every American of [EPA's "Powering the Great American Comeback" initiative](#)**

1.0 PROJECT

The City of Manitowoc (City) was awarded a community-wide assessment grant to evaluate petroleum and hazardous substance brownfields. The funds will be used to complete a comprehensive inventory and prioritization of brownfields properties, Phase I and II environmental site assessment and remedial planning activities, supported by a comprehensive public outreach and involvement program for select high-priority brownfields located throughout the City.

2.0 INTRODUCTION AND PROPOSED OUTPUTS AND OUTCOMES

The Small Business Liability Relief and Brownfields Revitalization Act was signed into law on January 11, 2002. The Act amends the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by adding Section 104(k). Section 104(k) authorizes the U.S. Environmental Protection Agency (EPA) to provide funding to eligible entities to inventory, characterize, assess, conduct cleanup, and reuse planning, remediate, or capitalize revolving loan funds to remediate eligible brownfields sites. The Brownfields Utilization, Investment and Local Development (BUILD) Act was enacted on March 23, 2018 as part of the Consolidated Appropriations Act, 2018. The BUILD Act reauthorized EPA's Brownfields Program and made amendments to the 2002 Small Business Liability Relief and Brownfields Revitalization Act. Authorized changes affect brownfields grants, ownership and liability provisions, and state and tribal response programs. Finally, the Infrastructure Investment and Jobs Act (IIJA) of November 2021 provided additional funding and opportunities for communities to address the economic, social, and environmental challenges caused by brownfields sites. Pursuant to these provisions, EPA conducts annual Brownfields grant competitions. Recipients were selected from applications prepared in accordance with the "FY25 Guidelines for Brownfield Assessment Grants (Community-wide Assessment Grants)," and submitted in a national competition. The City was selected for Assessment funding in the FY 2025 competition.

The City will use the funding provided by this grant to complete an update of the area's inventory and prioritization of brownfield properties, complete Phase I and II environmental site assessment and remedial planning activities, and conduct a comprehensive public outreach and involvement program for select high-priority brownfields located throughout the community. The brownfields to be assessed in the targeted areas will be selected based, in part, on their potential to serve as catalysts for revitalization of the area. The Target Areas for the grant are CT-4, CT-5, and CT-8, an area that as a result of the communities experienced industrial collapse created an abundance of brownfields that represents over 23% of the City by area, an 11% decrease in population and a 34% increase in poverty in the past two decades, and a 72% decrease in manufacturing jobs since 2010, which is why redevelopment of these once thriving areas of the City is critical. The City has identified more than 688 potential brownfields throughout Manitowoc, with 56% located in the Target Areas. The priority sites within the Target Areas include the River Point District (a former railyard located in CT-4), 1500-1600 Franklin Street (a former tannery and aluminum manufacturer in CT-5), and 1000-1200 Water Street (a former dye house, grain elevator and food processor located in CT-8).

The City of Manitowoc Comprehensive Plan, the Manitowoc River and Trail Corridor Plan, the Tax Increment District No. 22, No. 16A, and No. 19 Project Plans, the Downtown Master Plan, and the Downtown Parking Analysis, along with the Revitalizing the Franklin Street Area plan prepared as part of the USEPA Office of Community Revitalization 2024 Building Blocks for

Sustainable Communities (BBSC) program (collectively referred to herein as the “Plans”) will guide the project. This reuse strategy is in direct alignment with community priorities and needs, as expressed by community members during public meetings held during development of the Plans. The underserved community struggles with severe lack of housing in the downtown area and lack of diverse commercial/recreational amenities; therefore, common established goals for these priority brownfield sites include providing affordable multi-family housing, generating business opportunities that stabilize the area, and enhancing recreational opportunities through connectivity with multi-modal trails.

The proposed projects will stimulate economic development via new and/or adaptive residential, commercial, and recreational reuses. The City’s revitalization plans are designed to protect the community and their investments and will not cause the displacement of existing residents or businesses. The following are benefits/outcomes that will be generated with this reuse strategy; increase affordable workforce and LMI housing options; support adaptive residential reuse, commercial reuse & energy efficiency projects; and, expanding multi-modal trail to support communities & nature-based resiliency solutions.

3.0 MANAGEMENT AND COORDINATION

The Manitowoc Brownfields Advisory Committee (BAC) was established 12 years ago to provide significant oversight/input on the City’s Brownfields program. The City of Two Rivers and Progress Lakeshore were added to the BAC through the award of a coalition site assessment grant in 2021. The general public and property owners near the subject property will be engaged in collaboration with the BAC and the grantee’s ongoing outreach efforts.

Current members of the BAC include:

- James Lemerond – Lakeshore Technical College
- David Diedrich – Retired Community Banker
- Abbey Quistorf – The Chamber of Manitowoc County
- Mike Huck – Consultant to Non-Profits
- Jamie Zastrow – Progress Lakeshore
- Terrance Fox – Lambert, Fox & Glandt LLP
- Dennis Tienor – Associated Bank
- Two Rivers Representative – City of Two Rivers
- Adam Tegen – City of Manitowoc

The BAC and coalition members will collaboratively oversee the implementation of the workplan for the grant and prioritize Sites for funding.

The cornerstone of the City’s Brownfields Program is enhancing public education/communication through continued workshops, resident questionnaires, and web-based engagement. Within one month of award, the City and the coalition members will develop a Community Involvement Plan (CIP) to leverage the expertise and networks of the BAC and coalition members. The CIP will be designed specifically to engage and inform the community members and to provide an avenue for feedback from the community. The approved CIP will be implemented in Fall 2025 to integrate

community involvement utilizing the BAC to engage the community and local businesses in the assessment, cleanup, and overall redevelopment of the priority brownfield sites.

Project meetings targeted at community involvement 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 property. Meeting facilities 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 through the CDA to ensure access to stakeholders with limited access. Meetings of the BAC are likely to be held on a monthly basis for the first year and bi-monthly thereafter, or as needs arise. Another method used to communicate progress will be the creation and regular updating of a project webpage on the City's website. The webpage will include project updates, fact sheets and meeting announcements, as well as links to project documents and deliverables (as a means of maximizing transparency). The webpage will also include a mechanism for soliciting project input. The City will compile community input on a quarterly basis and circulate the summary to the BAC to develop response options. Public input and the response will be summarized in the quarterly project progress reports and on the project webpage.

Paul Braun, City Planner, for the City of Manitowoc, will serve as the Project Manager and primary point of contact for the Project. Mr. Braun will be responsible for implementing grant funded activities in accordance with the approved Work Plan. He will also approve all contracts and reports; coordinate meetings; manage the public outreach; and oversee work by the environmental and other contractors, as well as manage project finances. Mr. Braun has worked on the City's FY18 USEPA CWA grant, FY13 RLF grant, FY18 USEPA SSA grant, FY21 USEPA Coalition Assessment grant, FY22 USEPA Cleanup grant, and most recently a FY24 USEPA Cleanup grant. Mr. Braun has served in planning, zoning, and economic development for over 30 years as a municipal staff member.

4.0 PROJECT DESCRIPTION

The City has developed the appropriate tools and procedures to immediately begin implementation of this grant and execute key project activities within the performance period. In February of 2023, the City retained a QEP (Stantec Consulting Services, Inc; Stantec) per the requirements of 2 CFR 200.317 - 200.326 to perform the environmental assessment tasks. If needed, additional contractors can be procured following these methods. The City will utilize the expertise of the BAC, to provide additional guidance on use of grant funds to complete the project. The following table summarizes the timing of key project activities and responsibilities that will take place over the life of the grant.

| Task 1 - Activity: Program Management |
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| i. Project Implementation: Finalize contract with QEP; prepare Quarterly Reports, Annual Financial Reports, and Disadvantaged Business Enterprise (DBE) Reports; update ACRES; Grant Closeout Report. |
| ii. Anticipated Project Schedule: Finalize contract with QEP July 1, 2025. Quarterly progress reports will be submitted by Jan. 30th, April 30th, July 30th, and Oct. 30th of each year, with the first due on Jan. 30, 2026. Annual DBE reports will be submitted by Oct. 30th, with the first due on Oct. 30, 2026. Grant project closure expected in Q1 FY29. |
| iii. Task/Activity Lead: City Project Manager and City Project Coordinator, with input from QEP. |

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| iv. <u>Outputs:</u> Administrative Records; QEP Procurement Documentation; (16) Quarterly Reports; (3) Annual Financial Reports; (3) DBE Reports; (1) Grant Closeout Report. |
| Task 2 - Activity: Brownfield Inventory and Prioritization |
| i. <u>Project Implementation:</u> Update the City of Manitowoc dynamic federal and state GIS database records with sites of potential concern; historic brownfield maps collection; and cloud-based brownfields GIS Database. Identify additional sites for consideration/prioritization under this grant (City has identified over 688 brownfields community-wide). |
| ii. <u>Anticipated Schedule:</u> Begin in Q4 FY25 and complete by Q2 FY26, with annual updates by Q1 of FY27 to FY29. |
| iii. <u>Task/Activity Lead:</u> City Project Manager, with support from City GIS staff and QEP. |
| iv. <u>Outputs:</u> Inventory GIS Files; Inventory Report (tables, maps, # of sites identified); Prioritization Memorandum. |
| Task 3 - Activity: Phase I and II ESA's, Supplemental Site Investigations, Remedial Action Plans, and Revitalization Planning |
| i. <u>Project Implementation:</u> Update QAPP annually. Prepare the following for priority sites identified in Section 1.a.ii and additional sites prioritized for assessment in Task 2: EDs/access agreements; Phase I ESAs; Sampling and Analysis Plans (SSSAPs) and Phase II ESAs; Supplemental SSSAPs, SIs, and RAPs; and a Revitalization Plan with public charrettes for priority brownfield. Eligibility Determination requests will be submitted to the USEPA (for hazardous substance brownfields) or the WDNR (for petroleum brownfields) for approval. Phase I ESAs will comply with the <i>All Appropriate Inquiry</i> Final Rule and ASTM E1527-21. Phase II ESAs will be conducted per ASTM 1903-19. SIs and RAPs will be prepared per the WDNR requirements found in ch. NR 700 Wis. Administrative Code. |
| ii. <u>Anticipated Schedule:</u> First Eligibility Determinations, Phase I ESA, Phase II ESA, and Remedial Plans by Q4 FY25, with work through the grant performance period. |
| iii. <u>Task/Activity Lead:</u> City Project Manager to coordinate work with the QEP, secure access agreements, and review all reports/plans. QEP to complete Eligibility Determinations, Phase I ESAs, QAPP updates, Supplemental/SSSAPs, Phase II ESAs, Site Investigations, Remedial Action Plans, and Revitalization Plan. |
| iv. <u>Outputs:</u> (3) QAPP updates, and up to (8) EDs; (7) Phase I ESAs; (6) SSSAPs & (6) Phase II ESAs; (5) Supplemental SSSAPs & (5) Site Investigations; (3) RAPs; (1) Revitalization Plan. |
| Task 4 - Activity: Community Outreach |
| i. <u>Project Implementation:</u> Create CIP. Host up to (16) BAC/community meetings in Target Area neighborhoods and (6) focus meetings for each priority brownfield. Present at (3) regional/state meetings and the 2025 National Brownfields Conference. Prepare project webpage, fact sheets, and press releases. |
| ii. <u>Anticipated Schedule:</u> First BAC/community meeting in Q1 FY26, then quarterly through FY29. (3) meetings in priority site neighborhoods in Q2 FY26, (3) in Q1 FY27. Regional, State, and National Brownfields Conferences 2025-2029. |
| iii. <u>Task/Activity Lead:</u> City Project Manager and BAC, with support from QEP. |
| iv. <u>Outputs:</u> CIP; meeting agendas, notes, and sign-in sheets; project fact sheets and press releases; project webpage, with updates; and presentation materials for Regional/State/National Brownfields Conferences. |

5.0 BUDGET

A summary of the overall budget for grant funded activities is provided below, followed by an

explanation for how cost estimates were developed and applied, with unit costs as applicable.

| Budget Categories | Task 1 | Task 2 | Task 3 | Task 4 | Total |
|---------------------|--------------------|-----------------------------------|--|--------------------|------------------|
| | Program Management | Inventory & Prioritization Update | Phase I ESAs; SSSAPs, Phase II ESAs, Supplemental SSSAPs, RAPs, Planning | Community Outreach | |
| Personnel | \$5,472 | \$4,560 | \$4,864 | \$5,776 | \$20,672 |
| Fringe | \$1,728 | \$1,440 | \$1,536 | \$1,824 | \$6,528 |
| Travel | | | | \$3,100 | \$3,100 |
| Other | | | | \$1,500 | \$1,500 |
| Contractual | \$7,200 | \$6,000 | \$455,000 | | \$468,200 |
| TOTAL BUDGET | \$14,400 | \$12,000 | \$461,400 | \$12,200 | \$500,000 |

Descriptions and budget justifications below are based on costs incurred by the City during the City's FY21 Coalition Assessment Grant. Personnel (\$38/hr) and fringe (\$12/hr) are an average of City staff. An average of \$150/hr was used for QEP consulting firm contractual services and units based on grant closeout in Q1 FY29.

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| Task 1 – Program Management: Total Budget = \$14,400 |
| Cost Basis and Assumptions: Personnel/Fringe Costs of \$7,200 is budgeted for an estimated 144hr of work by City Program Manager and staff (3hr/mo @ \$50/hr) in completing various Cooperative Agreement oversight, reporting activities and deliverables for Task 1 described in Section 3.a.i-v. Contractual Costs of \$7,200 are for an estimated 48hr (1hr/mo @ \$150/hr) of work by the QEP in providing assistance in completing progress (e.g., quarterly, annual) reports. |
| Task 2 – Brownfield Inventory and Prioritization Update: Total Budget = \$12,000 |
| Cost Basis and Assumptions: Personnel/Fringe Costs of \$6,000 is budgeted for an estimated 120hr of work by City GIS staff (@ \$50/hr). Contractual Costs of \$6,000 is budgeted for 40hr of work by the QEP (@ \$150/hr) to expand/update the GIS inventory and prioritization rubric. |
| Task 3 – Phase I ESAs; SSSAPs, Phase II ESAs, Supplemental SSSAPs, RAPs, Planning: Total Budget = \$461,400 |
| Cost Basis and Assumptions: Personnel/Fringe Costs of \$3,200 are budgeted for an estimated 64hr of work by the City Project Manager and staff (8hr/site for 8 sites @ \$50/hr) for executing access agreements, coordinating QEP work, and reviewing deliverables; \$3,200 in Personnel/Fringe costs are budgeted for an estimated 64hr of work by the City Project Manager and staff (@ \$50/hr) organizing/hosting three charrettes/meetings as part of Revitalization Planning. Contractual Costs of \$455,000 include costs for the QEP to complete 3 QAPP updates (\$5,000); 8 ED forms (@\$2,000 each = \$16,000); 7 Phase I ESAs (@\$7,000 each = \$49,000); 6 SSSAPs (@\$2,500 each = \$15,000) and 6 Phase II ESAs (@\$27,000 each = \$162,000); 5 Supp. SSSAPs (@\$2,500 each = \$12,500) and 5 SIs (@\$27,500 each = \$137,500); 3 Remedial Action Plans (@ \$11,000 each = \$33,000); 1 Revitalization and Reuse Plan (@ \$25,000 each = \$25,000). |

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| Task 4 – Community Outreach: Total Budget = \$12,200 |
| <p>Cost Basis and Assumptions: Personnel/Fringe Costs of \$7,600 are budgeted for an estimated 152hr of work by the City Project Manager and staff to develop the CIP (24hr @ \$50/hr); organizing and hosting quarterly outreach events (5hr/quarter @ \$50/hr); presenting at 6 local community meetings (24hr @ \$50/hr); and attending and presenting at 3 regional/state meetings (24hr @ \$50/hr). Travel Costs of \$3,100 are for 2 City staff to attend the three-day National Brownfields Conference in 2025: \$1,560 for meals and for lodging (@\$260/person/night); \$700 for registration (@\$350/person); \$700 for air travel (@\$350/person); and \$140 for ground transportation (@ \$70/person). Other Costs of \$1,500 are budgeted for printing costs (\$1,000) and mailing costs for public notices (\$500).</p> |
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6.0 MEASURES OF SUCCESS

Project results, outputs and outcomes will be tracked, and progress measured/evaluated weekly using existing tools developed by the City and summarized in quarterly progress reports and annual financial reports prepared during the project. 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; if a deviation of more than one fiscal quarter is reached, interventions (e.g., increased team meetings) will be implemented to maintain the project schedule. Project outcomes and accomplishments, including project milestones, deliverables, and leveraged resources will further be tracked on a monthly/quarterly basis in the ACRES database to further measure progress.

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 analysis of: 1) increased housing opportunities; 2) increased sustainable manufacturing through generation/retention of new businesses and jobs; and 3) stabilization downtown by increasing appealing retail amenities and removing vacant properties that often harbor criminal activity. If the timelines for advancing one or more phases of work within the Target Areas are not well aligned with the USEPA grant project period, then the City and QEP will work with USEPA and WDNR to adjust the approach to maintain progress on achieving desired project outcomes. Outcomes will be tracked long-term on a five-year basis by the City and reported in future brownfield conferences, fact sheets, and/or the City website.

7.0 QUALITY ASSURANCE

The City of Manitowoc “Quality Assurance Project Plan [QAPP] for Implementation of a USEPA Brownfield Assessment Grant for Petroleum and Hazardous Substances” prepared by Stantec on April 7, 2025 will be adapted for use on this project. The Stantec (2025) QAPP describes the sampling and analytical strategies, methods and procedures approved by EPA that will be used in all project data collection. As outlined in the project description, the QAPP will be updated on an annual basis.

8.0 PRE-AWARD COST AUTHORIZATION

Although the Cooperative Agreement may not be awarded until October 1, 2025, The City is requesting pre-award cost approval for project related and scoped work activities to be completed up to 90 days prior to award. To accommodate the pre-award costs, the performance and budget period will start July 1, 2025. This will include portions of Task 3 as outlined and detailed in the attached Request for Pre-Authorization and Details for July-September 2025 dated May 23, 2025. All pre-award activities funded through the agreement will be eligible expenses conducted in accordance with this work plan and the City understands that these costs would be fronted by the City with payment or reimbursement via the EPA grant coming only after October 1, 2025; or when the cooperative agreement is in place.