



**RE: Application Information Sheet – FY2026 USEPA Brownfields Multipurpose Grant Application, Former Phillips Lionite Mill Property, Phillips, Wisconsin**

Price County United Limited (PCUL) is pleased to submit this application for a United States Environmental Protection Agency (USEPA) Fiscal Year (FY) 2026 Brownfields Multipurpose Grant. Information requested in the grant application guidelines is provided below.

- 1. **Applicant ID:** Price County United Limited, N9751 Bass Lake Road, Phillips, Wisconsin 54555
- 2. **Website URL:** <https://pricecountyunited.org/>
- 3. **Funding Requested**
  - a. **Grant Type:** Multipurpose
  - b. **Federal Funds Requested:** \$1,000,000
- 4. **Location:** City of Phillips, Price County, State of Wisconsin

5. **Target Area and Priority Site Information:** The Target Area is Downtown Phillips, Wisconsin. The Priority Site is the Former Phillips Lionite Mill Property located at 115 Depot Road, Phillips, Wisconsin 54555. A map showing the location of the Priority Site and the Target Area is attached.

**6. Project Contacts**

Role	Project Director and Chief Executive
Name	Dr. Lynda Ludwig
Title	President
Phone #	715-661-0178
Email Address	[REDACTED]
Mailing Address	N9751 Bass Lake Lane, Phillips, Wisconsin 54555

7. **Population:** City of Phillips (Census Tract 55099970500): 1,569 people.

**8. Other Factors Checklist**

Other Factors	Page #
Community population is 10,000 or less.	Yes – see page 1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Yes – see page 1
The priority site(s) is in a federally designated flood plain.	Yes – see page 2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A



Other Factors	Page #
The reuse of the priority site(s) will incorporate energy efficiency measures	Unknown
The proposed project will improve resilience to the impacts of extreme weather events and natural disasters.	No
At least 20% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 3.A.(2), for priority site(s) within the target area.	No
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	N/A

N/A = not applicable

**9. Letter from the State Environmental Authority:** A letter of acknowledgment from the Wisconsin Department of Natural Resources (WDNR) is provided as **Attachment A**.

**10. Releasing Copies of Applications:** No confidential information has been included in our grant application.

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Figure No.

1

Title

### Priority Site Location Map

Client/Project Price County United Limited Phillips Lionite Property Application for USEPA Multipurpose Grant 193709634

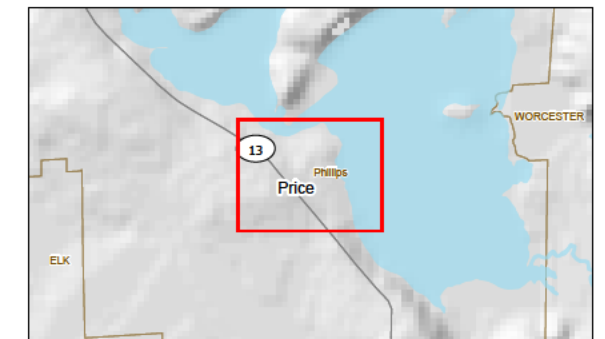
Project Location C. of Phillips Price Co., WI Prepared by AJS on 2023-10-31 TR by JS on 2023-10-31 IR by WC on 2023-10-31



0 100 200 Feet  
(At original document size of 11x17)  
1:2,400

Legend

- Subject Property
- Large Woodchip Pile
- Woodchip/Bark Silo
- Railroad Track
- Railroad Spur/Siding
- Boiler House
- Finished Goods Warehouse and Loading Dock
- Hardboard Plant
- Main Office
- Mill Buildings
- Miscellaneous Storage
- Print Plant
- Saw Building
- Warehouse



Notes  
 1. Coordinate System: NAD 1983 StatePlane Wisconsin North FIPS 4801 Feet  
 2. Data Sources: Stantec, SCO, USGS, WisDOT, WDNR  
 3. Orthophotography: WROC 2020



**1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**1.a. Target Area and Brownfields – Overview of Brownfield Challenges & Description of Target Area:** The City of Phillips (population 1,569; the City) was founded in 1879 in the center of vast forests that originally covered northern Wisconsin and still do today. The Target Area (TA) for the grant is the downtown area of the City of Phillips (“Downtown Phillips” or “Downtown TA”) which is located within Census Tract (CT) Number: 55099970500 (“CT705”). Phillips is geographically isolated from other urban areas, with the nearest cities with at least 5,000 residents (Rhineland and Merrill) lying nearly 70 miles away, and the nearest cities with over 100,000 residents (Duluth and Green Bay) being over a 3-hour drive away. The City is situated on the north-south running State Highway (Hwy) 13 and bordered by Elk and Duroy Lakes, part of the Phillips Chain of Lakes.

The main industries in Price County today include logging, manufacturing, and tourism. Many people visit Phillips to enjoy outdoor recreational activities. However, the City has suffered serious economic declines in recent years. There are numerous vacant or partially occupied buildings in the City’s downtown, many of which are in disrepair. Along the main commercial corridor on Lake Avenue, there are three former gas stations, a former Ford Dealership, and numerous other vacant commercial buildings. The slow decline in the City’s population (which peaked in 1920) limits the types and numbers of commercial businesses that can profitably operate in the Downtown, adding to the redevelopment challenges.

The most significant brownfield site in the Downtown TA, and the priority brownfield site for the multipurpose (MP) grant, is the 26.2-acre former Lionite Mill property which occupies nearly half of the downtown area. The former Lionite Mill, a complex of 41 buildings, manufactured hard board and at its peak employed over 200 area residents. Since the Mill closed in 2015, the site has remained vacant, with the buildings slowly deteriorating, culminating during an April 2023 snowstorm in the collapse of the roofs for over 25% of the buildings in the complex. This large facility (and earlier lumber mills on the site dating back to 1883) have separated other areas of the downtown from a ½-mile section of its waterfront on Duroy Lake for more than 140 years. The acquisition of the former Mill by Price County United Limited (PCUL) in November 2023 was a key initial step towards what we hope will be a transformation of the downtown into a vibrant mixed-use neighborhood, full of new small local businesses, housing, and other amenities. Other prominent brownfield sites in the downtown include a former auto dealership (Fred Mueller Ford), three former gas stations, and a dozen vacant or underutilized commercial buildings. These sites contribute to the negative perception by residents and visitors alike of a slowly dying community, adding to the challenges for the remaining local employers in trying to attract or retain workers, and in fiscal challenges for the City resulting from the depressed property values and property tax revenues.

United States Environmental Protection Agency (USEPA) funding will primarily be used to perform additional assessment, reuse planning and cleanup activities at the former Lionite Mill property. Grant funding will be used to complete an overall revitalization plan for the Downtown TA, building on a Comprehensive Plan update completed in 2024, and additional visioning completed by PCUL and the City in 2024 as part of preparing an application for a USEPA Community Change Grant (CCG), which included input from hundreds of community residents.

**1.b. Description of the Priority Brownfield Site(s):** Downtown Phillips is blighted and impacted by multiple vacant and underutilized brownfield sites, in particular, the former Lionite Mill property which occupies nearly half of the downtown. Other brownfield sites in the downtown include a former auto dealership (Fred Mueller Ford), three former gas stations, and a dozen vacant or underutilized commercial buildings lining the City’s historic commercial corridor centered on Lake Avenue/State Hwy 13. Additional detailed for the Lionite Mill property and two other brownfields in the Downtown TA are provided on **Table 1** below.

**Table 1. Priority Brownfield Sites**

<b>Former Phillips Lionite Mill Property (115 Depot Street, 2 parcels, 26.2 acres)</b>
<p>The Phillips Lionite Mill property occupies 26.2 acres and consists of two parcels – a 25.5-acre parcel where the former mill buildings are located, and a 0.7-acre vacant parcel to the south. The property is located along the western shore of Duroy Lake and is bordered to the north by County Highway H/Depot Street, and to the southwest by an active railroad corridor operated by Fox Valley and Lake Superior Railroad. The main commercial corridor (and the historic downtown business blocks centered on Lake Street) lies on the west side of this railroad corridor.</p> <p>Use of the property as a sawmill dates back to 1883. The sawmill operated under a series of owners before closing in 1933, and included planing equipment, wood fiber processing equipment, dry kilns, box factories, tramways, machine shops, refuse burners, engine houses, ash houses, oil houses, offices, a mill pond, and sawdust and lumber storage. After being vacant for approximately 20 years, use of the site shifted in the 1950s from milling to the production of finished wood products. Various owners operated the facility between 1958 and 2015 primarily to produce wood paneling for interior walls. The current mill complex when acquired by PCUL included 41 distinct buildings or building areas with a combined floor area of 173,378 square feet (ft<sup>2</sup>). The buildings included a large boiler house, saw building, warehouses, mill buildings, a hardboard production area, a maintenance shop, a print plant, and miscellaneous storage buildings. Major equipment (some more than 50 feet high) included truck scales, debarkers, chip silos, conveyor belts, dust collectors, dryers, cyclones, humidifiers, and a paint line.</p>

A USEPA Cleanup Grant was awarded to PCUL in 2024 for a 9.2-acre portion of the property that contained the mill buildings and equipment. Environmental records documented the historic presence of 16 aboveground storage tanks (ASTs) and 7 underground storage tanks (USTs) used to store fuel oil, diesel fuel, leaded gasoline, and xylenes. The USTs appear to have been closed and removed prior to 2000, with the exception of 15,000 and 28,000-gallon fuel oil tanks which were abandoned in place. Several of the USTs had documented releases which were assessed and remediated by one of the previous owners, and the “cases” closed by the Wisconsin Department of Natural Resources (WDNR) in 1999 and 2002. According to the Flood Insurance Rate Map 550345, the property is partially located in Zone C (areas of minimal flooding) and is partially located in Zone A (areas at high risk of flooding).

The primary environmental concerns associated with the areas of the site associated with the USEPA Cleanup Grant are asbestos containing materials (ACMs) and restricted wastes present throughout the buildings. A primary concern with other areas is the suspected widespread presence of historic fill materials placed during initial development of the site and use as a sawmill. Another site-wide concern are records of at least four catastrophic fires that occurred prior to 1900 which destroyed the sawmill buildings as well as burned hundreds of thousands of board feet of lumber stored in large piles throughout the property (as shown on historic Sanborn fire insurance maps). Ash and debris contaminated with polynuclear aromatic hydrocarbons (PAHs) are likely present buried in the subsurface throughout the property. The site is by far the most significant brownfield in the Downtown TA, and is a priority for assessment, cleanup, and reuse due to its very large size, strategic location on the downtown lakefront, potential to support an array of uses and to address an array of priority community needs and concerns, and the continuing significant negative effect of the site on the community in its current condition.

**Former Express Mart Property (235 N. Lake Avenue, 3 parcels, 0.25 acres)**

This site is a small, but at a prominent location within what is considered the north “gateway” area of the downtown. Based on a Phase I environmental site assessment (ESA) completed by PCUL in 2024, the site was in use as a gas station and auto repair facility for at least 70 years. Although the contamination “case” for the site was closed by WDNR, some further assessment of contamination is required within the footprint of the dilapidated former station building which was demolished by the current owner in 2025. The current owner has presented plans to the City for development of a small mixed-use building on the property that would include basement parking, two first floor commercial spaces, two levels of apartments and a rooftop deck open to the public. But development plans were reportedly put on hold in part due to uncertainty regarding plans for the Lionite Mill site which partially blocks the view from this site to Duroy Lake, and which would increase the difficulty of attracting tenants for the residential units. The completion of the area-wide plan and detailed plans for the Lionite site would help in advancing redevelopment plans for this site as well.

**Former Belan Realty Co. Property (265 N. Lake Avenue, 2 parcels, 0.07 acres)**

This site is occupied by a vacant two-story 2,700 ft<sup>2</sup> brick building constructed in the 1950s. Although used since the 1980s as a realty office, a Phase I ESA completed in 2024 found evidence it was in use by a dry-cleaning business during 1969-1976. Other concerns include potential impacts from releases on the adjoining former Express Mart property. Potential contaminants include petroleum, metals, and PAHs, as well as ACM and LBP in the building. Redevelopment plans for the Express Mart property assumed that the building on this site would be demolished and the lot combined with that for Express Mart to form a larger development site. Redevelopment plans for this site would therefore also benefit from completion of the area-wide plan.

**1.c. Identifying Additional Sites:** It is anticipated that assessment, reuse planning, and cleanup needs for the former Lionite Mill site would be sufficient to fully utilize the MP Grant funding. However, in the event that grant funding remains after addressing the needs for that site, PCUL will work with the brownfield advisory committee (BAC) to prioritize funding for use on the large number (at least 15 or more) brownfields in the Downtown TA. The specific prioritization criteria that will be used will be developed with input from the BAC, but would likely include the following criteria: 1) certainty of access and landowner collaboration/cooperation, 2) likelihood of site and landowner eligibility for needed assessment, cleanup, or reuse planning activities, 3) redevelopment plans and their feasibility and alignment with community priorities, 4) project readiness and likelihood or potential for MP grant funded activities to meaningfully advance a site to cleanup and/or reuse, 5) potential for MP grant funded activities to position sites for other cleanup or redevelopment funding, and 6) degree of known or potential threats from the site to human health or the environment, and the extent to which MP grant funded activities could help to meaningfully assess or address those threats.

**1.d. Revitalization of the Target Area – Overall Plan for Revitalization:** An overall plan for revitalization of brownfield sites within the Downtown TA does not currently exist. An area-wide reuse plan for revitalization of brownfields within Downtown Phillips will be completed as part of Task 3 of the MP Grant project. A primary focus for the plan will be on reuse of the former Lionite Mill property, but the plan will include an inventory and high level analysis of other vacant, abandoned, and underutilized properties throughout the Downtown TA, with potential more in depth analysis and planning for four additional brownfield sites that were a focus for reuse planning related to the CCG application (i.e., the former Express Mart property at 235 N. Lake Ave., former Belan Realty Co. property at 265 N. Lake Ave., former

Fred Mueller Ford property at 145-175 N. Avon Ave., and former Gowery Title Co. property at 215 S. Lake Ave.).

Budget is also included in Task 3 for the completion of several additional site-specific reuse planning studies for the former Lionite Mill property, including a “resource roadmap” (to help identify additional funding sources and strategies), a detailed infrastructure study, and market feasibility studies for development of housing on portions of the Site, and for potential commercial or light-industrial users of several existing buildings. These studies may be prepared as stand-alone studies but could also be incorporated as attachments into the area-wide plan.

Planning efforts will build on planning completed by the City of Phillips for the latest update to its comprehensive plan (City of Phillips 2024-2034 Comprehensive Plan, April 2, 2024 Draft) and well as visioning and outreach performed over a 10-month period in 2023 by PCUL in collaboration with the City in support of an application for a USEPA Community Change Grant, which including development of concept plans for the former Lionite Mill property as well as the four other brownfield sites referenced above. That visioning was premised upon the possibility of securing up to \$20 million in grant funding, which would have been sufficient to fully fund the envisioned reuse projects. The area-wide plan will focus on identifying and refining reuses that will be financially viable without the benefit of a \$20 million injection of federal funding.

For the Lionite Mill site, the current vision for revitalization is the development of a combination of recreational, community, housing, commercial and light-industrial uses. Key priorities for the lakefront areas are to permanently restore and maintain public access, achieved in part through construction of a 3,000-foot multi-use trail. Previous visioning included plans for construction of two new buildings in areas overlooking the Lake – a community recreation center and a community boathouse. Both would incorporate facilities or amenities that could be used to generate income (such as by hosting events) – which will be essential for defraying their long-term operation and maintenance costs, without further straining the City’s limited budget. After two years of PCUL having owned the former Lionite Mill complex, it is now recognized that at least 5-6 of the buildings are in good condition and could, with relatively minimal rehabilitation, attract interest from potential commercial or light industrial tenants. Rehabilitation and leasing of these buildings would at a minimum generate income for PCUL needed for general maintenance and security for the Mill site as a whole and potentially generate sufficient income to fund key improvements in other portions of the property. Previous visioning included plans to develop a significant number and variety of housing units on the property, which is a critical need for attracting new residents and in particular, professionals needed by key local employers. However, the feasibility of developing housing on the Site will depend in large part on the findings of the additional environmental assessment work.

**1.e. Outcomes and Benefits of the Overall Plan for Revitalization:** The cleanup and reuse of the former Lionite Mill property will have a profound effect on revitalization of the Downtown TA as a whole. This is due to: a) the massive size of the site (approximately equal in area to the rest of the downtown), b) its blighting influence on the downtown as a whole (with smokestacks, silos, and industrial equipment extending 50 to 60 feet in the air and looming over the downtown), c) its role for the past 140 years in separating the downtown and public access to what should be the downtown’s highest value amenity (nearly 3,000-ft of shoreline on Duroy Lake, and d) its potential to serve an array of future public and private uses. As noted in Section 1.b, there are at least a dozen vacant and underutilized commercial buildings lining the City’s historic downtown commercial district on Lake Avenue/State Highway 13. The elimination of the blight associated with the former plant would on its own increase the prospects for renewed investment along this corridor. Full transformation of the Lionite site to include new housing, public green spaces, a lakefront multi-use trail, and a community recreation center and boathouse, would further stimulate investment throughout the Downtown TA.

A significant focus for reuse will be permanently restoring public access to the waterfront areas, with a key amenity being a waterfront trail extending approximately 3,000 feet along the Lake. PCUL and other partners are working on plans to create up to 20 miles of additional connected multi-purpose recreational trails in and around Phillips, for which the Lionite site would serve as a future hub. Two other key amenities that have been proposed in previous visioning for the site are a community recreation center and community boathouse.

When PCUL first acquired the Lionite Mill site in 2023 and applied for the USEPA Cleanup Grant, it was anticipated that all buildings associated with the former Mill complex would be demolished. However, after over two years of working on the Site, it has become apparent that at least 5-6 of the buildings are in good condition, and with relatively minimal rehabilitation, would likely attract interest for leases from commercial or light industrial businesses. Based on the lack of any environmental data in this portion of the Property that indicate the potential need for vapor mitigation measures or active groundwater remedial systems, it is anticipated that the only exposure pathway that will need to be addressed for many of the buildings (once they are free of hazardous chemical in containers, ACM, and other hazardous building materials) is the direct contact pathway for which the existing buildings floor slabs and foundations will suffice – so long as the buildings remain in place. Given the location of many of these existing buildings adjacent to an active railroad line, commercial or light-industrial uses may be the best interim and perhaps long-term use for these areas. The benefit of retaining and rehabbing some of the existing buildings is that this creates the potential to generate income for PCUL that can be used to maintain the site as a whole and to fund future studies or improvements.

The commercial or light industrial uses would also help create local jobs and economic opportunities.

**1.f. Strategy for Leveraging Resources – Resources Needed for Site Reuse:** Securing additional resources for cleanup (in particular, from the State of Wisconsin) depends on having sufficiently assessed environmental conditions in order to have reliable cleanup plans and cost estimates. The more complete the assessment, the greater the likelihood of successfully pursuing additional funding, with the “gold standard” being having an approved remedial action plan in hand. Therefore, the additional environmental assessment and remedial planning activities that will be funded through the MP Grant will significantly enhance PCUL and the City’s ability to pursue other types of cleanup funding – in particular, Wisconsin Economic Development Corporation (WEDC) Brownfield Cleanup Grants which can provide up to \$250,000 per redevelopment project). The USEPA MP Grant is particularly useful for leveraging funding from WEDC Brownfield Grants as it can also be used by PCUL or the City to meet a 1:1 match requirement. Both private developers (including not-for-profit) and municipalities are eligible for these grants. The success rate for these grants is relatively high, with an added favorable factor being the requirement that WEDC fund projects in all of its regions, with North Central Wisconsin being a region that historically has been underfunded.

In December 2025, the City of Phillips, with assistance from PCUL, applied to USEPA Region 5 for a Targeted Brownfield Assessment for the Lionite Mill site. Based on discussions with USEPA Region 5 staff, a decision on the application will likely not occur until near the end of the year (2026). If this grant is secured, it will complement the MP grant and enhance our ability to fully assess the site to the extent necessary to complete remedial action planning, or shift MP funding (subject to USEPA approval) to other uses. Both the City and PCUL are utilizing assistance from the Kansas State University Technical Assistance for Brownfields (KSU TAB) Program, and will continue to do so. The type of assistance that can be provided by KSU TAB at present is limited by the lack of environmental data for the Lionite Mill site, as well as a lack of any overall revitalization plan for the Downtown TA and the Lionite Mill site. It is anticipated that assessment and reuse planning performed using the MP Grant will open up opportunities for additional types of collaboration and technical assistance from KSU TAB.

The various proposed reuse planning activities for the Lionite Mill site will be invaluable for helping to pursue an array of funding opportunities. The resource roadmap will help PCUL (and the City) to identify additional funding opportunities as well as strategies for their successful pursuit. A critical planning need relative to almost every type of funding is to develop a detailed reuse plan for the Lionite Mill property as a whole, including which existing buildings will be retained and rehabilitated, where future housing and community facilities will be located, etc. Until we develop a comprehensive reuse plan, developed with full input from residents and other community stakeholders, it will be nearly impossible to begin design work or to line up potential investors or funding resources for desired future developments. The infrastructure analysis will be critical to defining needs and developing detailed cost estimates that are necessary to utilize TID funding to address those needs. The market study(s) will be essential for evaluating the financial viability for certain reuses, and if confirmed viable, attracting investors.

**1.g. Strategy for Leveraging Resources – Use of Existing Infrastructure:** As a large former industrial facility, the Site is well served by nearly every type of existing utility (i.e., municipal water, sewer, natural gas, and high voltage electric lines). It is also located on an active railroad line, with a dedicated spur serving the property. Furthermore, it is located within one block of State Hwy 13, which serves as the major north-south highway passing through this region of Northern Wisconsin. However, creating a detailed reuse plan will be essential for figuring out how best to extend utilities throughout the interior of the site to serve both existing buildings (which may require separate utility connections to serve multiple individual users), as well as new buildings in undeveloped portions of the Property. Full reuse and redevelopment of the property will require construction of some new interior roads, sidewalks, and utility service lines. It is anticipated that funding for these improvements can be obtained through City using TID funding. However, in order to use TID, it is necessary to have a detailed understanding of the phasing, costs, and anticipated future assessed value planned redevelopment projects. It is anticipated that initial reuse projects focused on rehabilitation of 5-6 existing buildings can be served adequately by existing interior roads, and utility connections. The reuse planning funded through the MP grant will be invaluable in facilitating the reuse of existing infrastructure, in planning for additional infrastructure needed for future phases of development, and in supporting the use of TID to provide funding for these improvements.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**2.a. The Community’s Need for Funding:** The USEPA MP grant will help meet the needs of a City and community that is both very small in size (with a population of only 1,569 residents) and which is characterized by low incomes. As detailed on **Table 2**, poverty rates in Phillips and the Target Area are approximately double those for the State and the US, while median and per capita incomes are about 40% lower than those for the State and the US. [

**Table 2. Economic Distress Data (American Community Survey [ACS] 2021 5-Year Estimates<sup>1</sup>)**

Income & Poverty	Phillips	Price County	State of WI	United States
Median household income <sup>A</sup>	\$40,982	\$52,052	\$67,080	\$69,021

<sup>1</sup> Notes for Table 1. Data downloaded on 10/18/2023. All data are 5-year estimates for 2017-21.

Per capita income <sup>A</sup>	\$21,887	\$30,997	\$36,754	\$37,638
Unemployment rate <sup>B</sup>	5.3%	2.5%	3.5%	5.5%
Households w/ food stamp/SNAP benefits <sup>C</sup>	21.2%	12.5%	10.2%	11.4%
Poverty rate for all people	22.0%	13.2%	10.7%	12.6%
Poverty rate for under 18	33.7%	20.9%	13.5%	16.3%

A) In 2021 inflation adjusted dollars. B) Civilian population in labor force ≥16 years. C) Past 12 months. SNAP = Supplemental Nutrition Assistance Program.

Having total annual local tax revenues of only \$1.3 million, the City lacks the financial resources to perform the upfront assessment, planning, and cleanup activities necessary to transform the Lionite site into a community asset. The closure of the Lionite Mill in 2015 was a significant contributing factor to the City’s current financial distress. When it closed, the Mill employed 53 local residents and had a combined payroll of ~ \$3.5 million in compensation and benefits to its employees annually. It was also one of the largest payers of user fees to the City-owned wastewater treatment facility. As a not-for-profit, community-based organization, PCUL is entirely reliant on donations, grants, and time donated by volunteers to implement its projects, and has a greater need for grant support than many other types of applicants. MP Grant funding will benefit a community that is both very small and low income.

**2.b. Health or Welfare of Sensitive Populations:** As shown on **Table 3**, the Downtown TA contains disproportionately high numbers of several sensitive population groups, including children and women of child-bearing age.

**Table 3. Sensitive Populations in the Target Area (ACS 2021 5-Year Estimates)**

Sensitive Population Category	Phillips	Price Co.	State of WI	US
Children under 18 years (% of total population)	25.9%	18.2%	22.0%	22.5%
Woman 15-44 years (% of total population)	31.5%	26.0%	24.4%	20%

Residents in the Downtown TA also suffer from exceptionally high disability rates and an array of poor health outcomes, based on CT-level estimates published by the Centers for Disease Control and Prevention (CDCP) in 2024<sup>2</sup>. As shown on **Table 4**, the prevalence rates for residents in CT705 rank between the 83<sup>rd</sup> and 99<sup>th</sup> percentiles for 6 of 7 disability measures and between the 90<sup>th</sup> and 98<sup>th</sup> percentiles for 8 of 9 “health outcome” measures (relative to all 1,392 CTs in the State of Wisconsin).

**Table 4. Disability and Health Measures for the Downtown Phillips Target Area**

Disability Measure	Rate	Percentile	Health Outcome Measure	Rate	Percentile
Any disability	30.4%	88.2	Arthritis	35.1%	97.6
Cognitive disability	12.8%	69.8	Asthma	10.6%	61.0
Hearing disability	9.6%	99.0	Cancer	9.4%	95.2
Independent living disability	8.8%	83.2	Chronic kidney disease	4.0%	95.8
Mobility disability	16.3%	93.0	Chronic obstructive pulmonary disease	8.6%	95.0
Self-care disability	4.8%	86.2	Current heart disease	8.5%	97.9
Vision disability	5.5%	83.0	High blood pressure	37.4%	90.1
			High cholesterol	40.0%	94.1
			Stroke	4.3%	94.0

Note: Rates are crude (non-age adjusted) rates for adults 18 years or older. Percentiles are relative to rates for all 1,392 WI CTs.

These conditions and outcomes are exacerbated by historically limited and increasingly worsening healthcare access. Urgent care services are currently unavailable in Price County, and the entire county is considered a “Maternity Care Desert.” The skilled nursing component of the only nursing home in Phillips (Aspirus Pleasant View) closed in December 2022<sup>3</sup>. In January 2024, one of the largest hospital systems serving the region (Hospital Sisters Health System and Prevea Healthcare) announced a decision to close all eight of their hospitals in western WI laying off 1,400 employees<sup>4</sup>. In February 2024, Marshfield Clinic announced plans to close its Home Health and Hospice facility in Phillips after 40 years of service<sup>5</sup>. The health conditions combined with the poor healthcare access are factors in CT705 ranking at the 98<sup>th</sup> percentile for low life expectancy relative to other Wisconsin CTs.

The MP Grant, if awarded, will be used to advance assessment, cleanup, and reuse of a massive brownfield site that is equal in area to the rest of the downtown. Assessment activities funded by the grant will help to identify and define risks associated with the intensive industrial use of the Site dating to 1883, which has only minimally been assessed by previous studies. The reuse planning and cleanup activities will advance plans for development of a lakefront trail, a community recreational center, and a community boathouse which will help in improving community health.

<sup>2</sup> PLACES: Local Data for Better Health, Census Tract Data 2024 release | Data | Centers for Disease Control and Prevention (cdc.gov)

<sup>3</sup> [Pleasant View to close skilled nursing facility | Price County Review | apg-wi.com](#)

<sup>4</sup> [Complete exit from western Wisconsin: HSHS, Prevea closing area hospitals permanently | News | wqow.com](#)

<sup>5</sup> [Marshfield Clinic Health Announces Closure | Northwoods Drifter](#)

**2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions:** As shown on **Table 3**, the Target Area has higher than average rates for asthma (61<sup>st</sup> percentile), and significantly higher rates for cancer (95<sup>th</sup> percentile). Price County as a whole has the **5<sup>th</sup> highest rate of cancer of the 72 counties in Wisconsin (National Cancer Institute)**<sup>7</sup>. The Wisconsin Environmental Public Health Tracker (WEPHT) indicates that **Price County has an age-adjusted rate (per 100,000 population) of 13.1 for nervous system cancers** (compared to the state average of 6.9); **cancer of the larynx is 6.2** (compared to the state average of 3.0); **lung cancer is 59.1** (compared to the state average of 57.1); **pancreatic cancer is 18.5** (compared to the state average of 14). This is a very high rate of cancers for our sparsely populated county.

Exposure to airborne ACMs and other regulated building materials influence COPD, asthma and cancer rates. Large quantities of ACMs have been documented in building materials and industrial equipment at the Lionite Mill site. Although ACMs on equipment have already been addressed using funding from the USEPA Fiscal Year (FY) 2024 Cleanup Grant, and ACMs within buildings are scheduled to be abated through the same grant, ACMs may be present in other areas of the Site that have not yet been assessed. Underground chemical releases influence cancers, kidney disease rates. Assessment activities to be funded by the MP grant will help to fully define environmental exposure risks throughout the Lionite Mill site. Cleanup activities to be funded by the grant, anticipated to include construction of an engineered soil cap, will significantly reduce threats associated with areas of the site confirmed to have exposed significantly impacted soil. Reuse planning for the Lionite Mill site and other brownfields will help to advance projects such as the lakefront trail, community recreation center, community boathouse, and community health hub that will help to improve resident's health and fitness.

**2.d. Economically Impoverished/Disproportionately Impacted Populations:** As documented on **Table 2**, residents in the Downtown TA are economically impoverished, and like residents in many small manufacturing cities in the “rust belt” suffer from the commercial/industrial policies (or in some cases – the lack thereof) that result in the closure of former manufacturing facilities by large out-of-state corporate owners, in response to foreign competition (and associated US trade policies) or efforts by the large corporations to switch production to lower cost states or foreign countries. The facilities are mothballed and the local communities left holding the bag. As previously discussed in **Section 1.b**, environmental testing at the Lionite Mill property has been limited in scope and extent, with 90% or more of previous testing confined to the outdoor locations within the 9.2-acre area that is the “Cleanup Site” for PCUL’s USEPA FY2024 Brownfield Cleanup Grant – a project that is primarily focused on addressing hazardous chemicals in containers and tanks, universal wastes, and ACM and other regulated building materials present on or within buildings and industrial equipment. Therefore, the MP Grant, will be used to fully assess all areas of the Lionite Mill site and thereby identify threats to human health and the environment present throughout the property. Cleanup funding provided by the MP Grant will enable PCUL to address exposure risks in the 17-acres of the site that are not eligible for use of the funding from the FY2024 Cleanup Grant. The data obtained will enable PCUL to pursue State and other funding that could be used to perform additional cleanup. The successful reuse of the Site, and in particular, the planned public improvements or facilities will benefit all residents. Cleanup and reuse of the Site is also viewed as an important element in long-term efforts to transform the perception of the community by visitors and residents alike, and to enhance our ability to attract and retain residents who are health and other types of professionals needed to improve the economic vitality of the community, and to guard against further decline that would likely occur if the Lionite Mill and other sites are left to tax deed speculators, scrappers, urban miners, and “gut and run” operators.

**2.e. Community Engagement – Prior/Ongoing Community Involvement:** Community involvement activities related to the Target Area and Lionite Mill site have been on-going nearly continuously since May 2024 when PCUL was awarded it’s USEPA Brownfield Cleanup Grant. These efforts intensified throughout 2024 as PCUL, in partnership with the City, pursued a USEPA CCG focused on eight projects, including three (a waterfront trail, a community recreation center, and a community boathouse) to be located on portions of the former Lionite Mill property. In support of the grant application, PCUL implemented an intensive 6-month long outreach program to inform the community regarding the CCG Program, to solicit input on a series of potential projects, and to refine those plans based on resident feedback. The outreach program leveraged regularly scheduled public meetings, including those for the City of Phillips, Phillips Public Library Board, Price County Area Chamber of Commerce, and Phillips School Board. These meetings provided the opportunity for PCUL to introduce the CCG Program opportunity, explain the goals and vision, and garner feedback on the approach. Following the initial promotion of redevelopment plans at community meetings, informational advertisements and the survey link were placed in the local newspaper for six weeks. The survey was further promoted through additional community meetings, social media, and the PCUL website, and received over 170 responses in 5 months.

A series of monthly “Walk N Talk Tours” were organized and held in the evenings, with a total of 146 attendees through September 2024. During these tours, community members could meet each other, discuss their knowledge of the areas chosen for redevelopment projects, provide input, view the historic buildings and facades, and identify walkability challenges in the downtown area. Additionally, three “Table Talk Tours” were held where 61 community members came. The Table Talk Tours provided resources in English and Spanish about livable cities, community engagement and

advocacy, and government resources. Presentations and visuals were then provided about the proposed projects, followed by question-and-answer sessions and breakout groups.

Public events have been leveraged as additional opportunities to engage with the community regarding the changes people would like to see as a result of grant funding. Approximately 500 people attend “Music in the Park”, “Sport & Home Show”, and PCUL distributed print materials, banners and posters on display directing people to the project website and survey.

Understanding potential barriers related to internet access and competence, news and radio coverage have informed the public on proposed projects and encouraged survey participation. This included three television stations filming interviews at the former Lionite Mill site, and participation on a “Walk N Talk Tour.” Additionally, Radio Eagle River broadcasted an interview about the projects and Radio Park Falls WNBI helped to promote the Walk N Talk Tours. The outreach efforts were extraordinarily effective in generating public interest, as evidenced by over 6,300 visits to the project website being logged in a 16 months – in a community of 1,500 residents.

As part of the award of the USEPA Cleanup Grant, outreach has continued in accordance with a Community Involvement Plan (CIP) for the project approved by USEPA. The focus for engagement has shifted to keeping residents and community stakeholders informed regarding environmental liabilities associated with the property, and progress and plans related to removal of hazardous chemicals, universal wastes, regulated building materials, and equipment. Because the MP Grant will focus largely on the same Site, it is planned that outreach efforts for the MP Grant will be fully integrated with those for concurrent Cleanup Grant project, with the approved CIP adapted for use on this project, but expanded to reflect the additional assessment, reuse planning, and cleanup activities that will be implemented.

**2.f/g. Project Involvement/Project Roles:** Information on eight project partners is provided on **Table 5** below. If funding is awarded, we will form a Brownfields Advisory Committee (BAC) to facilitate involvement by these partners in making decisions with respect to cleanup and future reuse of the Site.

**Table 5. Project Partners and Roles**

<p><b>City of Phillips.</b> (Shelby Kosmer, City of Phillips Clerk, <a href="mailto:clerk@cityofphillips.com">clerk@cityofphillips.com</a>). The City is our most important partner for advancing reuse of the Lionite Mill site, and has partnered in previous applications for both State and USEPA funding, serving as our statutory partner for our application for a USEPA Community Change Grant in 2024, and applying to USEPA in December for a Targeted Brownfield Assessment (TBA) to be performed on the Lionite Mill site. The City collaborated with PCUL in performing the demolition of the collapsed north end of the building in 2024 (which presented a public safety hazard), and has formed an advisory committee that meets with PCUL on a monthly basis to help advance cleanup and reuse of the Site. The City will continue to support the project throughout the MP grant.</p>
<p><b>Phillips Area Chamber of Commerce (PACC) and Price County Tourism (PCT).</b> (Johnathan McArthur, Executive Director, 715-339-4100, <a href="mailto:chamber@phillipswisconsin.net">chamber@phillipswisconsin.net</a>). The missions of these organizations are to support businesses and increase tourism in Phillips and Price Co. The PACC will engage with the business community regarding reuse and redevelopment of the Lionite property. The PCT will provide input on how reuse can support tourism opportunities.</p>
<p><b>Price County Area Trail Hub (PATH)</b> (Ron Kendziera, 715-820-1567) and <b>Price Area Trail Hub, Inc. (PATHI)</b> (Christy Speer, <a href="mailto:info@priceareatrailhub.org">info@priceareatrailhub.org</a>). The mission for both organizations is to support development of recreational trails in the County. Both organizations will assist with planning and funding for a 3,000-foot-long new trail envisioned for the east edge of the Lionite Mill property.</p>
<p><b>Price County Wellness Coalition (Dani Hofman, 715-339-3054, <a href="mailto:dani.hoffman@pricecounty.wi.gov">dani.hoffman@pricecounty.wi.gov</a>).</b> PCUL is part of the coalition whose mission is to improve the health and wellbeing of Price County residents. Our partners include two area medical hospitals-Marshfield Clinic and Aspirus, Park Falls YMCA, private corporate businesses 300+ employees, the Price County Health Department and the school districts. The coalition will provide input on reuse strategies for the Lionite Mill site that will address some of the profound health concerns as well as support decision making with respect to previously undocumented environmental health concerns associated with the site that are identified during assessment activities.</p>
<p><b>Lac du Flambeau Tribe (LDFT)</b> (Kristen Hansen, Brownfields Coordinator, 715-588-3303, <a href="mailto:khanson@ldftribe.com">khanson@ldftribe.com</a>). The LDFT will provide input on restoration of the lakefront areas.</p>
<p><b>UW-Platteville</b> (Amr El Ragaby, Ph.D, P. Eng. Associate Professor Civil and Environmental Eng, (608) 342-6167, <a href="mailto:elragabya@uwplatt.edu">elragabya@uwplatt.edu</a>). During the Spring 2026, the university, in collaboration with PCUL, will be implementing a Senior Engineering Project focused on reuse visioning and engineering evaluations for the Lionite Mill site. The project will include 4 faculty advisors and 8 students, who will spend approximately 150 hrs each engaged in research projects focused on building reuse options, hazardous materials, and development of trails and bridges. An onsite presentation will be delivered May 2026. It is anticipated that the initial project, if successful, will result in future projects focused on the Site that can be integrated with the reuse planning and studies to be performed as part of the MP Grant.</p>

**2.h. Incorporating Community Input:** The plan to communicate project progress within our community will have the following goals: 1) Encourage public understanding of brownfield site environmental conditions and constraints; 2) encourage public input and participation in decision-making related to cleanup and reuse; 3) provide the public with accessible, accurate, timely, and understandable information about cleanup projects as they move forward; 4) ensure

adequate time and opportunity for the community and community groups to provide informed and meaningful participation and for that input to be considered. Upon notice of award, we will utilize our existing CIP for the USEPA Cleanup Grant to create an updated CIP that integrates community involvement efforts related to the Lionite Mill property which is the focus for both grants. The CIP will be updated to incorporate the expanded reuse planning activities that will be funded through the MP Grant, and which will include additional brownfield sites within the downtown area. We will use an array of methods to conduct outreach including hosting formal community meetings focused on the general public at approximate 6-month intervals, quarterly meetings with stakeholders who are part of the BAC (to which the public will also be invited), posting of regular updates on the PCUL website, presenting information on the project at various local events, hosting walk-in-talk tours of the sites. Our website encourages submitting on-line comments and suggestions for our work on the Lionite site. All meetings will include options for participants to attend by phone (via call-in numbers) or virtually through Google Meet or other virtual meeting platforms.

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

**3.a/b/c/d. Description of Project Implementation, Tasks/Activities, Schedule, Leads, and Outputs:** No subawards, subgrants, or participant support costs are anticipated. The project has been organized into four tasks as detailed below. Although the grant award period is expected to be 5 years, we will seek to complete the project in 4 years or less.

<b>Task 1 – Outreach, Grant Management, and Reporting</b>
<p>i. <b>Activities:</b> <b>Outreach activities</b> will include: 1) public meetings, 2) BAC meetings, 3) providing updates on the PCUL website, 4) preparation of fact sheets and mailers, and 5) other outreach activities as detailed in Section 2.h. <b>Grant management activities</b> will include: 1) biweekly calls with the qualified environmental professional (QEP), 2) monthly calls with the USEPA Project Officer (PO), and 3) procurement of a QEP firm through a qualifications-based procurement (QBP) process compliant with procurement standards in 2 Code of Federal Regulations (CFR) Part 200, 2 CFR Part 500, and 40 CFR Part 33 Subpart C. <b>Reporting activities</b> will include: 1) quarterly progress reporting, 2) Property Profile Form submission and updates in the Assessment, Cleanup and Redevelopment Exchange System (ACRES), and 3) preparation of a final project report. <b>Other activities:</b> PCUL staff will also attend four national or regional brownfields training conferences.</p> <p>ii. <b>Schedule:</b> Upon notice of award in May or June 2026, PCUL will proceed with procurement of a QEP, with a goal of having the firm under contract by the anticipated project start date of 10/1/2026. Community outreach activities will be on-going throughout the project, with major public engagement meetings held at approximate six-month intervals, but adjusted to align with the timing for key project activities or milestones (such as completion of an Analysis of Brownfield Cleanup Alternatives [ABCA]). Progress reports will be submitted on or before January 30<sup>th</sup>, April 30<sup>th</sup>, July 30<sup>th</sup>, October 30<sup>th</sup> of each year. Updates will be entered into ACRES following execution of the cooperative agreement, and upon completion of milestones related to assessment, remediation, WDNR approvals, and as redevelopment milestones are achieved or leveraged funding secured.</p> <p>iii. <b>Leads:</b> PCUL staff (Lynda Ludwig, with support from Cheryl Moore and Blake Pluemer) will lead this task, with support from the QEP on reporting and outreach activities.</p> <p>iv. <b>Outputs:</b> 1) Public outreach meetings (up to 8 total) with notices, agendas, presentations, sign-in sheets, and meeting notes. 2) BAC meetings (up to 8 total) and associated materials. 3) Outreach materials (fact sheets; results summary sheets; website updates). 4) Quarterly progress reports, final closeout report, &amp; ACRES updates. 5) Procurement documentation for the QEP.</p>
<b>Task 2 – Environmental Assessment and Remedial Planning Activities</b>
<p>i. <b>Activities:</b> The primary focus for environmental assessment will be the former Lionite facility. The scope of the assessment will depend in part on findings for sampling and delineation activities that will be completed as part of PCULs FY2024 Cleanup Grant within the 9.2-acre area that is the focus for that grant and which contains all of the former plant buildings and equipment. It will also depend on whether additional assessment activities are completed at the Lionite site by USEPA in response to the application for a TBA submitted by the City in December 2025. Regardless of whether or not the TBA is performed, it is anticipated that significant assessment needs will remain – to further delineate the magnitude and extent of impacts as necessary to effective plan for future site cleanup and reuse, as well as to WDNR requirements and expectations. If only limited further assessment is determined to be necessary, a greater portion of funding will be focused on remedial planning. It is anticipated that the environmental assessment will include completion of the following activities by the QEP: 1) preparation of an eligibility determination (ED) form for submittal to the USEPA PO, to confirm eligibility of the Site for use of funding from the USEPA grant (unless the USEPA deems this step unnecessary), 2) preparation of a quality assurance project plan (QAPP), 3) preparation of a Sampling and Analysis Plan (SAP)/Site Investigation (SI) Work Plan meeting both USEPA and WDNR requirements, 4) preparation of a Health and Safety Plan (HASP), 5) completion a supplemental environmental site assessment (ESA) also satisfying WDNR requirements for an NR716 SI and SI Report, 6) completion of a Remedial Action Options Report (RAOR).</p> <p>ii. <b>Schedule:</b> Preparation of the ED form and work on the QAPP will begin as soon as a contract is executed with a QEP, which is anticipated to occur by 10/1/2026. Work on the SAP and HASP be completed during the first three months of 2027, with a goal of having EPA and WDNR approvals in place in time to begin the field work in April or May 2027 (after the ground thaws). The field work may be completed in two or more phases to enable more strategic use of assessment funds, but it is anticipated that sampling results would be available by July or August 2027 (and be available for consideration as part of Task 3), with the final SI Report and RAOR being completed before the end of the year.</p> <p>iii. <b>Leads:</b> PCUL staff (Lynda Ludwig) will lead this task, with support from the QEP.</p>

iv. <b>Outputs:</b> 1) ED approval for the Lionite Mill site (if required). 2) QAPP. 3) SAP/SI Work Plan. 4) ESA. 5) ESA/SI Rpt. 6) RAOR.							
<b>Task 3 – Reuse Planning</b>							
i. <b>Activities:</b> Reuse planning activities proposed as part of Task 3 include: 1) Development of an overall area-wide reuse plan for downtown Phillips, with a primary on the Lionite Mill property, but consideration of 5-6 other brownfield sites in the downtown area that were a focus in the USEPA CCG application (i.e., former Express Mart property – 235 N. Lake Ave., former Belan Realty Co. property – 265 N. Lake Ave., former Fred Mueller Ford property – 145-175 N. Avon Ave., and the former Gowery Title Co. property – 215 S. Lake Ave.). 2) Add'l reuse planning activities for the Lionite Mill site, including a “resource roadmap” (to identify add'l funding sources and strategies), a detailed infrastructure study, and market feasibility studies for development of housing on portions of the Site, and for potential commercial or light-industrial uses for existing buildings.							
ii. <b>Schedule:</b> Initial work on the area-wide reuse plan will begin before the end of 2026, with a goal of completing a draft plan by mid-2027. The components of the plan focused on reuse of the Lionite mill property will be refined as data from Task 2 become available, to better align with environmental conditions. Based on the schedule for Task 2, it is anticipated that the area-wide plan will be completed by 12/31/2027. It is anticipated that the site-specific reuse planning activities would begin in early 2027 with a goal of completing these as well by the end of that year.							
iii. <b>Leads:</b> PCUL staff (Lynda Ludwig) will lead this task, with support from the QEP, as well as numerous project partners.							
iv. <b>Outputs:</b> 1) Area-wide revitalization plan focused on downtown Phillips, with primary focus on reuse options for the Lionite mill site. 2) Resource roadmap, infrastructure study, and two market studies – all focused on the Lionite Mill site.							
<b>Task 4 – Brownfields Cleanup</b>							
i. <b>Activities:</b> The specific cleanup activities that will be performed on the Lionite site will be determined in part based on the environmental assessment findings resulting from Task 2 and the reuse plans developed as part of Task 3. However, based on previous environmental data and the conceptual model for environmental impacts at the Site, it is anticipated that funding may largely be used to construct engineered barriers over areas of the property, in particular those within the 17 acres of the property not included within the 9.2-acre area eligible for cleanup activities funded through the FY2024 USEPA Brownfield Cleanup Grant. Because portions of this area are within a floodplain, the design of the cap will need to include grading plans such that construction of the cap will result in no net change in floodplain storage, and depending on redevelopment plans, create one or more future building sites that will be raised above the floodplain. The plans may also incorporate removal of soil and fill materials in some areas to accommodate creation of additional wetland areas. Assuming that cleanup is focused on construction of a soil cap within portions of the site, Task 4 activities will include: 1) preparation of detailed plans and cost estimates, 2) preparation of an ABCA, 3) application for applicable WDNR and/or federal waterway, stormwater, and wetland permits, 4) bid documents and bidding, 5) possible excavation and landfilling of contaminated soil from select “hotspot” areas, 6) purchase, trucking, placement, and grading of clean fill and top soil, 7) seeding and restoration of disturbed areas, 8) preparation of reports documenting cleanup activities.							
ii. <b>Schedule:</b> It is anticipated that work on Task 4 will generally not occur until after completion of Tasks 2 and 3. Work will likely begin in 2028 and be completed in 2029, subject to weather conditions and possible permit delays. This will provide up to two additional years for completion of any cleanup activities before the end of the 5-year project period (9/30/2031), in the event of delays or other factors whereby the project will benefit from completing Task 4 on a more extended timeframe.							
iii. <b>Leads:</b> PCUL staff will oversee this task, with the QEP assisting bidding and oversight of work by the remedial contractor(s).							
iv. <b>Outputs:</b> The outputs are uncertain, but will for certain include an ABCA, remedial design documents, bid documents and bid evaluations, documentation reports, and various cleanup activities completed using grant funds.							
<b>Administrative Activities</b>							
Various non-programmatic administrative activities (as defined by USEPA) will be performed by PCUL staff, as needed, throughout the project. No specific outputs are anticipated beyond PCUL timecards and other records documenting hours billed for specific administrative activities.							

**3.e. Cost Estimates:** PCUL is requesting \$1,000,000 in USEPA MP Grant funding as detailed below.

Line #	Budget Categories	Task 1	Task 2	Task 3	Task 4	Administrative	Totals
		Grant Mgmt. and Outreach	Environmental Assessment	Reuse Planning	Cleanup		
1	Personnel	\$36,000	\$12,500	\$15,000	\$25,000	\$4,000	\$92,500
2	Fringe	\$0	\$0	\$0	\$0	\$0	\$0
3	Travel	\$7,320	\$0	\$0	\$0	\$0	\$7,320
4	Equipment	\$0	\$0	\$0	\$0	\$0	\$0
5	Supplies	\$3,400	\$0	\$0	\$0	\$0	\$3,400
6	Contractual	\$55,944	\$221,550	\$131,250	\$52,500	\$0	\$461,244
7	Construction	\$0	\$0	\$0	\$390,000	\$0	\$390,000
8	Other (conference fee)	\$1,600	\$0	\$0	\$0	\$0	\$1,600
8	<b>Total Direct Costs</b>	<b>\$104,264</b>	<b>\$234,050</b>	<b>\$146,250</b>	<b>\$467,500</b>	<b>\$4,000</b>	<b>\$956,064</b>
9	Indirect Costs					\$43,936	\$43,936
10	<b>Total Federal Funding</b>	<b>\$104,264</b>	<b>\$234,050</b>	<b>\$146,250</b>	<b>\$467,500</b>	<b>\$47,936</b>	<b>\$1,000,000</b>

**Note:** 1) No funding for fringe benefits, equipment, or “other” direct costs is being requested. 2) All construction costs assume payment of prevailing wages under the Davis-Bacon and Related Acts (DBRA). 3) All contractual and construction costs are estimated, and actual costs will be subject to bids and proposals received. 4) >70% of funds are proposed for site-specific work such as site assessments, remediation, and associated tasks (70.2%). 5) >25% of proposed funds will be associated with site remediation (46.7%). 6) <5% total indirect costs (4.8%).

**Development and Application of Cost Estimates:**

<p><b>Task 1 – Outreach, Grant Management, and Reporting: Total Budget = \$121,064</b></p> <p><b>Personnel costs of \$36,000</b> are budgeted for grant management, coordination, outreach, and reporting activities to be performed by PCUL staff. It is assumed that: 1) general project coordination activities will require an average of 1 hrs per week over four years (= 208 hrs); 2) reporting activities will require approximately 8 hrs per quarter (= 128 hrs over 4 years); and 3) outreach activities will require an average of 24 hrs/quarter (= 384 hrs over 4 years). Personnel costs assume average compensation for PCUL staff of \$50/hr. <b>Travel costs of \$7,320</b> are included for the PCUL project manager to attend up to four national or regional brownfields training conferences, at an average cost of \$1,830(which is based on estimated costs of \$500 per conference for airfare, \$760 per conference for hotel rooms (4 nights), \$200 per conference for meals and incidentals; \$370 for vehicle mileage (driving from Phillips to the Minneapolis/St. Paul airport). <b>Supply costs of \$3,400</b> include \$1,800 for copying and mailing expenses averaging \$450/year and \$1,600 for providing lunches for BAC meeting attendees (assuming \$100 cost/meeting). <b>Contractual costs of \$55,944</b> are budgeted and include: 1) \$18,720 for the QEP project manager to attend biweekly project coordination calls (104 calls X 0.5 hrs/call X \$180/hr); 2) \$8,640 for the QEP to attend monthly calls with PCUL and the USEPA PO (48 calls X 1 hr/call X \$180/hr), 3) \$8,640 for the QEP to assist with quarterly and annual reporting activities (3 hrs/quarter X 16 quarters X \$180/hr); 4) \$17,280 for the QEP to provide support for outreach activities (assuming 6 hrs/quarter X 16 quarters X \$180/hr); and 5) \$2,664 for QEP project management costs for Task 1 (budgeted @ 5% of other Task 1 contractual costs). <b>Other costs of \$1,600</b> are budgeted for the conference fees for the PCUL project manager to attend up to four national or regional brownfields training conferences.</p>
<p><b>Task 2 – Environmental Assessment Activities: Total Budget = \$234,050</b></p> <p><b>Personal costs of \$12,500</b> are budgeted for PCUL staff to coordinate and provide oversight for environmental assessment activities by the QEP (250 hrs X \$50/hr). <b>Contractual costs of \$221,550</b> are budgeted and include: 1) \$136,000 for supplemental Phase II ESA and remedial planning activities for the former Lionite Mill property, 2) \$25,000 for completion of up to five Phase I ESAs (\$5,000 each), 3) \$50,000 for Phase II ESAs or remedial planning activities at up to two additional small sites, and 4) \$10,550 for QEP project management costs for Task 2 (budgeted @ 5% of other Task 2 QEP costs).</p>
<p><b>Task 3 – Reuse Planning: Total Budget = \$146,250</b></p> <p><b>Personnel costs of \$15,000</b> are budgeted for PCUL staff to manage and assist with reuse planning activities completed by the QEP (300 hrs X \$50/hr). <b>Contractual costs of \$131,250</b> are budgeted for the completion of the area-wide revitalization plan focused on the former Lionite Mill site.</p>
<p><b>Task 4 – Environmental Cleanup Activities: Total Budget = \$467,500</b></p> <p><b>Personnel costs of \$25,000</b> are budgeted for PCUL staff to manage and coordinate environmental cleanup activities (500 hrs X \$50/hr). <b>Contractual costs of \$52,500</b> are budgeted for the QEP to prepare required plans, oversight, and reporting for cleanup activities. <b>Construction costs of \$390,000</b> are budgeted for a contractor to perform cleanup activities at the former Lionite Mill property. Construction costs assume payment of prevailing wages under the DBRA.</p>
<p><b>Administrative Costs: Total Budget = \$47,936 (equal to 4.8% of the total grant request amount)</b></p> <p><b>Direct Administrative Costs:</b> Personnel costs of \$4,000 are budgeted for 80 hrs of work by PCUL staff performing direct administrative activities (20 hrs/year X 4 years X \$50/hr). <b>Indirect Administrative Costs of \$43,936</b> are budgeted. Allowable indirect costs were determined by first calculating the modified total direct costs (MTDC) for the project (\$558,664) which equals the combined total of estimated personnel, fringe, travel, supply, and contractual costs. This was then multiplied by the de minimis indirect cost rate of 15%, which equals \$83,800 in potential allowable indirect costs. The budget was reduced to \$43,936 to have the total administrative costs be below the 5% maximum allowed on USEPA Brownfield Grants.</p>

**3.f. Plan to Measure and Evaluate Environmental Progress and Results:** We will closely track and monitor progress on the project throughout the grant period. Upon notification of grant award, tasks, milestones and reporting requirements will be integrated into a master project schedule. **Short-term outputs and outcomes** for the project will be tracked and documented and include: 1) the environmental assessment and cleanup documents that are completed for the project (including the CIP, SAP/QAPP, Phase I/II ESAs, procurement and bidding documentation, remedial documentation reports, DBWA compliance records, and WDNR permits and approvals), 2) the number of outreach meetings held and number of participants, 3) the mass of contaminated waste/soil/fill removed and landfilled, 4) the estimated mass of contaminants removed, and 5) the area of land made safe for reuse through soil removal, engineering cap construction, and other remedial measures.

**Longer-term redevelopment outcomes** will also be tracked and measured and will include: 1) the acres of land developed for parks, greenspace or other public use, 2) the acres of land restored for enhanced ecological use, 3) the feet of trails or public walkways created, 4) the number of affordable and other housing units created, 5) the square footage of commercial space created and associated number of jobs and annual wages, 6) the amount of public and private funding leveraged, and various sources from which it was obtained, and 7) the use of the various community amenities by area residents or visitors.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**4.a/b/c. Programmatic Capability – Organizational Capacity, Structure, and Key Staff:** Although PCUL was established relatively recently (in 2022), it grew out of efforts dating back nearly a decade by its leaders to bring positive change to our community. Since being formed, PCUL has contributed significantly to an update to the City of Phillips Comprehensive Plan, performed planning and pursued state grants for development of a trail system and for the reconstruction Highway 13 through the downtown, and purchased or secured options to purchase five brownfield sites that are a focus for this grant. The capabilities and commitment of PCUL to our community are evidenced by what has been our most challenging and significant accomplishment to date – the purchase in 2023 of the 26.2-acre former Phillips Lionite Mill property (which occupies nearly half of downtown Phillips) and the successful pursuit in 2023-24 of a \$1.68 million USEPA Brownfields Cleanup Grant which is being used to perform abatement, demolition, and cleanup within a 9.2-acre portion of the property. The opportunity to acquire this property became a possibility only in April 2023 after the roof for over 25% of the facility’s buildings collapsed. Recognizing the “once-in-140-years” opportunity to restore public access to the downtown lakefront, PCUL in seven months managed to: a) persuade the out-of-state owner to sell the property (and recognize a >\$8 million loss on his investment) through a complex, months-long process involving dozens of meetings and multiple law firms, b) complete \$30,000 of environmental due diligence activities, and c) prepare a successful application prior to the 11/13/2023 deadline. Over \$90,000 in consulting expenses were incurred by PCUL to make this high-risk pursuit a possibility, with the knowledge that only one previous community-based organization (CBO) in Wisconsin had ever successfully pursued a USEPA Brownfields Cleanup Grant. As purchase of the property was a requirement for grant eligibility, PCUL had to go “all in” and secure \$2 million in funding commitments to complete the transaction one day before the submittal deadline.

The leaders of PCUL have deep connections to Phillips and/or Price County:

- Dr. Lynda Ludwig is the executive director and co-founder of PCUL. She is a veterinarian who for the past 24 years has operated 2 of the 3 veterinary clinics serving Price County. Through her practice, she has come in contact with a significant portion of all households in both Phillips and Price County, at least 70% of which own pets. She is a 4<sup>th</sup> generation resident of Phillips. Her father was an electrical engineer and entrepreneur with 90 patents whose inventions revolutionized the corrugated box industry worldwide. His company, Marquip, went bankrupt in 2000 but was acquired by BW Papersystems (BWP), a \$650 million annual revenue global paper products and technology company that remains headquartered in Phillips and which with over 600 local employees, is the largest employer in Price County. Dr. Ludwig’s great grandfather cofounded the initial board mill constructed on the Phillips Lionite Mill property beginning in 1945. Dr. Ludwig founded The Meadows, now the Meadows of the North, an affiliated organization that works with Price County School District on student engagement and summer programming. Dr. Ludwig has managed the USEPA Brownfield Cleanup Grant awarded to PCUL in 2024.
- Blake Pluemer recently retired after serving in various roles including Vice President (VP) of Operations and Senior VP of Sales during a 40-year career with BWP, the largest employer in Price County. Blake has been engaged in the Phillips community through various organizations including the youth hockey programs in Phillips and Park Falls. He founded SEALS, a youth hockey team comprised of high school students from Phillips and Park Falls, as well as the Phillips Chain of Lakes Association (PCOLA) with over 400 members, which helps manage 1,200 acres of surface water resources, for which he has served as president for 31 years.
- Cheryl Moore grew up in Phillips and served as President of the Village of Catawba in Price County for >20 years. She coordinated a collaboration between the Kennan/Catawba sewer, fire department, and ambulance service. Cheryl brings more than 30 yrs of international accounting and finance experience to PCUL.

Run exclusively by community members who have deep connections to Phillips and Price County, PCUL combines local dedication with business expertise, contributing to the successes already demonstrated by this organization. The robust outreach completed by PCUL in 2024-26 as part of the USEPA Cleanup grant and in support of an application submitted for a USEPA Community Change Grant, demonstrates PCUL’s commitment to engaging the community and ensuring that future development strongly aligns with community needs.

In addition to the board members and their experience, PCUL is comprised of a variety of committees that report to the board on a monthly basis: Parks and Recreation/Trails, Housing, Brownfields, Economic Development, Community Outreach/Public Relations and Media, Buildings and Grounds, Arts and Culture, and Project Management. Committee leaders will bring further capabilities to the implementation of an MP grant. For example, the Arts and Culture Committee leaders Matt and Suzie Kendziera each have more than 30 years of experience as musicians. Matt has 20 years of experience in nonprofit leadership, and Suzie has more than 20 years of experience in event planning.

**4.d. Acquiring Additional Resources:** PCUL routinely contracts out for engineering and consulting services and has expertise in complying with the requirements in 2 CFR 200.317-326 – having completed a fully compliant solicitation for our previous USEPA Brownfield Cleanup Grant awarded in 2024. PCUL will complete new procurements, in accordance with these requirements for both the “contractual” and “construction” services to be funded by the MP grant. Our procurement system includes development of Request for Proposal (RFP)/Request for Qualifications (RFQ) in house, with review by PCUL’s attorney prior to issuance. We have also made use of the services of KSU TAB in

developing our previous RFQ. Proposals received are reviewed by 3-5 PCUL representatives, including our board members and 1 or more volunteers with specialized expertise relevant to the project. Interviews may be conducted depending on the size of the project and the quality and number of proposals received. Consultants are scored, ranked, and selected based on the scoring/selection criteria specified in the RFP/RFQ. Contracts, that include appropriate USEPA and federal contract clauses, are then executed with the selected firm, subject to legal review. As part of our FY2024 grant award, we successfully completed our pre-award compliance review with USEPA, for which our pre-award certification is valid through October 28, 2028.

**4.e. Past Performance and Accomplishments – Currently Has or Previously Received an EPA Brownfield Grant:** PCUL has been the recipient of one previous USEPA Brownfield Grant – a \$1,677,894 **FY2024 Cleanup Grant (CA No. 4B00E03877; Project Period = 8/1/2024-9/30/2028)**.

**4.e.(1) Accomplishments:** In May 2024, PCUL was awarded a USEPA Brownfield Cleanup Grant for a 9.2-acre area within the 26.2-acre former Phillips Lionite Mill property. Procurement of an environmental consultant was completed on an accelerated schedule. An RFQ for an environmental consultant/QEP was issued by PCUL on 6/10/2024. The bid response period was extended by an additional 30 days (from 7/12/2024 to 8/15/2024) in response to a request from the USEPA PO to incorporate an additional task in the Work Plan. Multiple proposals were received, reviewed, scored in accordance with the specified evaluation criteria, and an award letter issued by PCUL on 9/12/2024, and a contract executed with that firm on 10/2/2024. An initial public outreach event was held at the site on 7/18/2024 in conjunction with a site visit by the USEPA PO. While waiting for the cooperative agreement to be executed, PCUL cooperated with the City in having the City contract with a demolition firm that completed abatement and demolition for a building at the north end of the property that had collapsed.

PCUL paid over \$340,000 of back taxes that were owed by the former owner on the property.

Additional activities completed during 2024-26 have included: 1) establishment of a BAC, 2) establishment of a collaborative work group with representatives from the City, PCUL, and other local government entities, 3) completion of multiple public outreach events, 4) hiring as a part-time PCUL employee a retired local resident who had served as the plant's environmental coordinator for 20 years, to assist with management of proper disposal of hazardous chemicals, petroleum products, universal wastes remaining within the plant buildings, 5) completion of environmental review record (ERR) and National Historic Preservation Act (NPHA) reviews, 6) removal and recycling (at no cost) of all petroleum products and hydraulic fluids stored in tanks and equipment, 7) inventorying and consolidation of all paints, solvents, and other hazardous materials stored in hundreds of containers throughout the former plant buildings, 8) preparation an initial ABCA focused on the removal or abatement of chemicals, universal wastes, and of ACM on industrial equipment, 9) completion of a structural assessment of all buildings to determined appropriate safety measures for abatement, equipment removal, and potential future demolition or reuse, 10) negotiation of a long-term lease with the City for a portion of the property in use as a parking lot for the City's Elk Lake Park, 11) abatement of ACM on all industrial equipment within the plant designated for sale for reuse or for recycling as scrap, and 12) attendance at the National Brownfields Training Conference in Chicago.

**4.e.(2) Compliance with Grant Requirements: Open Agreements - USEPA Brownfield Grant – a \$1,677,894 FY2024 Cleanup Grant (CA No. 4B00E03877; Project Period = 8/1/2024-9/30/2028)** – PCUL has complied with all work plan, schedule, terms and conditions, and other requirements under its assistance agreement. As of 1/26/2026, \$1,331,226 in grant funds remain. We anticipate fully expending the remaining funds before the project end date. The progress during 18 months of the project has been extraordinary given some of the unique challenges posed by the Site, including the presence of massive equipment still belonging to the former owner, the poor structural condition of many of the buildings, the presence of hundreds of containers of hazardous materials and petroleum stored throughout the complex, and the challenges of the northern Wisconsin climate (with a short construction season, and a low temperature of -38 F occurring within the past week). The level of coordination with the WDNR on the project has reportedly been unique among USEPA Brownfield Cleanup Grant projects completed in Wisconsin to date, with up to 20 different WDNR staff having participated in calls and provided input on various state environmental requirements.

**ATTACHMENT A**

LETTER OF ACKNOWLEDGEMENT FROM THE WISCONSIN DEPARTMENT  
OF NATURAL RESOURCES



January 23, 2026

Dr. Lynda Ludwig, President  
Price County United Limited  
W6880 Hilly Haven Lane  
Phillips, WI 54555  
Via Email Mail Only to [REDACTED]

**Subject: State Acknowledgement Letter for Price County United Limited**  
FY26 EPA Brownfield Multipurpose Grant

Dear Dr. Lynda Ludwig,

The Wisconsin Department of Natural Resources (DNR) acknowledges the application of Price County United Limited (PCUL) for the U.S. Environmental Protection Agency (EPA) brownfield grant identified above.

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

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

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

Sincerely,

*Christine Sieger*

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

Attachment:  
Request dated January 17, 2026

cc:  
David Holmes, Stantec – David.Holmes@stantec.com  
Barb Herbst, DNR NOR – Barbara.Herbst@wisconsin.gov