**1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (50 points)**

**1.a. Target Area and Brownfields (15 points)**

1.a.i. Background and Description of Target Area (5 points)

* + 1. The Fort Belknap Indian Community (FBIC) is applying for a $500,000 cleanup grant to cleanup four important sites on the Fort Belknap Indian Reservation. Established in 1888, the Fort Belknap Indian Reservation (Reservation) is home to the Assiniboine (Nakoda) and Gros Ventre (Aaniiih) Tribes. FBIC has a tribal membership of approximately 6,700 enrolled members, of which about 3,000 live on the Reservation. [[1]](#footnote-1) The Reservation encompasses 675,147 acres about 40 miles south of the Canadian border in north central Montana. The land is mostly rolling hills with the Little Rocky Mountains at the southern end of the Reservation. Historically, the Gros Ventre and Assiniboine were nomadic hunters and warriors following the buffalo which provided them the necessities of life. Today, the main industry on the Reservation is agriculture, consisting predominantly of the operation of small cattle ranches, irrigated alfalfa fields, and dry-land farming.

The target area for our brownfields cleanup activities includes the communities of Fort Belknap Agency and Lodge Pole, two small towns within the Reservation boundary. Fort Belknap Agency, the largest of four communities within the Reservation, has a population of 1,567 people[[2]](#footnote-2) and is the home of the Tribal Government and primary Tribal services. Lodge Pole is a small community of 294 people in the southeastern corner of the reservation boundary, which is bounded by the Little Rocky Mountains to the south and results in an isolated community. Due to our small population and our persistent poverty, our tribal government and residents do not have the funds to maintain, renovate, or cleanup contaminated properties on the Reservation. With few commercial businesses and the isolated nature of the reservation, 39% of our residents are not in the labor force.[[3]](#footnote-3) As a result, numerous buildings are vacant, uninhabitable, and contaminated with asbestos, lead-based paint, and biological hazards. Our tribes desperately need to redevelop these properties to offer community services such as disaster relief and response, youth education centers, cultural centers, and recreational opportunities in Fort Belknap and Lodge Pole. As a result of COVID-19, FBIC has received additional CARES Act funding that would allow us to pay for the redevelopment of contaminated structures but does not include funding for cleanup. Brownfields cleanup grant funding is essential to clean up and reuse our existing community structures to improve quality of life for the Gros Ventre and Assiniboine people.

1.a.ii. Description of the Brownfield Site(s) (10 points)

Using Brownfields Cleanup Grant funding, FBIC will cleanup four properties within the communities of Fort Belknap Agency and Lodge Pole. Phase II ESAs were completed on the four properties in 2020 and 2021.

*Former Lodge Pole Elementary School* – The former single-story elementary school, located in Lodge Pole, was built in 1957 and operated as an elementary school until 2004, when a new school was constructed. Since 2004, the XX,XXX square foot building has remained vacant and used for storage. A Phase II ESA revealed 12 asbestos-containing materials located throughout the building, including plaster, vinyl floor tile, and ceiling tiles. Lead-based paint (LBP) was identified on 11 surfaces, as well as PCBs in light ballasts, two mercury-containing thermostats, mold, and pigeon guano.

*Former Agency Water Treatment Plant* – The former single-story treatment plant, located in Fort Belknap Agency, was constructed in 1973 to provide domestic drinking water to the surrounding community. The plant was closed in 2010 when a new water treatment plant was constructed. Since then, the XX,XXX square foot building has remained vacant. Asbestos was identified in the drywall joint compound on the interior of the building, as well as PCB-containing light ballasts and pigeon guano. Four large concrete fuel vault tanks used to hold chemicals for water treatment are located onsite with unknown contents. Chemical containing drums are present inside and outside of the building and contain 3 diallyl dimethylammonium chloride, 1 corrosive coagulant, and 1 of unknown contents labeled as “mix-up”.

*Sacred Heart Catholic Church* – Also known as the “Pink Church,” the two-story, XX,XXX square foot building is located on U.S. Highway 2 on your way through Fort Belknap Agency and the Reservation. The onsite cemetery was established in 1924 by Jesuit priests as a resting place for Native American veterans of foreign wars. The church was constructed in 1931 to serve as a Native American Mission Church and was closed in the mid-1960’s. The building is an iconic symbol of Catholic influence on the reservation that dates back to 1885. Asbestos was confirmed in the boiler jacket, LBP is present on the exterior, and pigeon guano covers the floor of the building.

*Old Agency Dump* - The 24-acre site is located one mile southwest of Fort Belknap Agency and contains no permanent structures. The Agency Dump reportedly operated on the site from the 1970s to the mid-1980s and was used by residents, tribal entities, Indian Health Services (IHS), and the Bureau of Indian Affairs (BIA). During its operation, the dump reportedly received a variety of wastes. After its closure in the 1980s, the site became an unofficial dump for debris such as concrete, pipes, and cars. Waste and debris are still currently present and visible at the ground surface. Two Phase II ESAs confirmed the presence of Pentachlorophenol (PCP) and di (2- ethylhexyl) phthalate, or DEHP in surface soils at concentrations above generic regional screening levels (RSLs).

**1.b. Revitalization of the Target Area (20 points)**

1.b.i. Reuse Strategy and Alignment with Revitalization Plans (10 points)

In 2018, our Tribal Planning Department conducted a Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis that included several public meetings in four of the communities on the reservation, a series of tribal council and departmental planning sessions, and review of current and previous strategic plans of the tribe, tribal enterprises, major entities, and the North Central Montana region. The SWOT analysis informed FBIC’s Comprehensive Economic Development Strategy (CEDS), which was most recently updated in 2020. From the SWOT analysis and the CEDS, the following revitalization plans were developed for FBIC’s priority brownfields sites.

*Former Lodge Pole Elementary School –* Creating full-time programs for reservation youth is one of the top 10 community needs, and development of a youth activities center to meet the economic, education, social and cultural needs of the youth is one of our goals for the next 3-10 years identified in our 2020 CEDS. At Hays Lodge Pole School District, the graduation rate is 60%, which is ranked within the bottom 50% of all 351 school districts in Montana. [[4]](#footnote-4) Very little recreational activities are available, especially during the winter months when temperatures can reach – 40\*F. Families struggle with access to preschools or daycare, which makes it difficult to maintain employment. To combat these obstacles, we plan to cleanup and redevelop the former Lodge Pole School as a youth center. After renovation, a portion of the classrooms would be repurposed as a daycare and preschool facility, and the remainder of the classrooms and the gymnasium would be used for after-school recreational programming. During the summer months, the Summer Food program would operate out of this building to help reduce food insecurity. The former school would also be used by tribal groups and the local Aaniih Nakoda College to offer adult education courses as well as native language and cultural programs.

*Former Water Treatment Plant* – One of the top goals listed in our 2020 CEDS Action Plan is to improve local disaster and emergency services. After cleanup, FBIC will redevelop the Water Treatment Plant as a disaster response command center. As outlined in our Pre-Disaster Mitigation and Emergency Response Plans, our Tribal Disaster and Emergency Services (DES) Coordinator would operate out of this building and would assist the Fort Belknap community with response to floods, wildland fire, winter storm events, severe windstorms, hazardous materials transportation, drought, and COVID-19 response. 4

*Sacred Heart Church* – Two of the resources identified in our 2020 CEDS as providing opportunities for economic growth on the reservation are our historic places and tourism.4 The Sacred Heart Catholic Church presents an opportunity for us to capitalize on both of these resources. After cleanup, we plan to restore the historic church to its original historic integrity. We will create a viewing area inside the church where tourists along U.S. Highway 2 can stop and see how the church looked in the 1930’s and provide information about the Catholic church’s influence on the Reservation.

*Old Agency Dump* – One of the greatest challenges on our reservation is lack of housing. A 2014 HUD report on Indian Housing Block Grant confirmed 204 households in Fort Belknap experience overcrowding, and we have a housing shortage of 343 houses. Our current Tribal Housing data shows that there is a 230+ waiting list for housing. In an effort to address a portion of this housing need, FBIC is working on a new housing development called Eagle Valley Estates subdivision, which will create 120 new home sites in 2022. Adjacent to the Eagle Valley Estates subdivision is the Old Agency Dump site. Once cleaned up, the Old Agency Dump site will be used to create solar and wind energy for homeowners in Eagle Valley Estates. Not only will solar and wind generate clean energy, but it will help reduce energy costs for our low-income residents.

1.b.ii. Outcomes and Benefits of Reuse Strategy (10 points)

*Former Lodge Pole Elementary School* – Due to the proximity of the town of Hays to the town of Lodge Pole, the Youth Center would have the ability to serve children from both towns. Approximately 230 children in grades kindergarten through high school are currently enrolled in the Hays Lodge Pole school district. These children could utilize the Youth Center’s after school programs,[[5]](#footnote-5) and an estimated 100 children ages 5 and under could be enrolled in the center’s early childhood development programs for a total of 330 children served. Research shows that providing a high-quality education for children before they turn five yields significant benefits, such as better performance in school, higher likelihood of graduating high school, and higher earnings in the workforce.[[6]](#footnote-6) National research on after school programs like Boys and Girls Clubs show that for every dollar invested, after school programs return $9.60 back to the community in the form of parent’s earnings and cost savings for their communities. Children enrolled in after school programs have improved grades and reduced alcohol use.[[7]](#footnote-7)

*Former Water Treatment Plant* – The development of a Disaster and Emergency Response Center at the former water treatment plant would result in our community being more prepared for natural disasters. Increased preparedness and the ability to respond to an emergent situation will prevent fatalities and injuries for our residents, reduce damage to our buildings and equipment, protect the environment and community health, and will accelerate the resumption of normal operations after a natural disaster or emergency. By preparing for these events, our tribe will be able to reduce the amount of funding that is spent responding to and rebuilding from them.

*Sacred Heart Catholic Church* – Restoration of the historic church will result in the preservation of our tribe’s history and will generate tourism revenue for our community. U.S. Highway 2 is one of the main east-west thoroughfares through Montana, and the church is strikingly visible from the highway. Of the 3.3 million visitors to Glacier Park each year, many of them drive past the church on their way to/from the park.

*Old Agency Dump* – The development of the former dump site for solar energy will not only generate clean energy and be environmentally friendly, but it will also present a significant cost savings for residents of the Eagle Valley Estates subdivision. The 25-year net savings for solar energy in Montana is estimated at $23,488 per home. For the 120-unit subdivision, this would present a total energy savings of over $2.8 million.

**1.c. Strategy for Leveraging Resources (15 points)**

1.c.i. Resources Needed for Site Reuse (10 points)

As a federally recognized tribe, FBIC is an eligible applicant for a number of redevelopment grants. Unfortunately, we were not able to secure firm leveraged funding commitments from project partners for reuse of the sites prior to submittal of this application. However, we are currently working with Mr. Michael Black Wolf, FBIC Tribal Historic Preservation Office Director, to apply for National Park Service Historic Preservation Grant funds for the restoration of the Sacred Heart Catholic Church. We are also working with FBIC Director of Planning, Ms. Delina Cuts The Rope, to apply for redevelopment funding for the school, water treatment plant, and former dump sites. FEMA Tribal Homeland Security Grant funds will likely be used to fund the renovation of the Former Water Treatment Plant building. We plan to apply to the U.S. Department of Energy Office of Indian Energy for grant funds to help pay for the required solar power plant and solar panels at the Old Agency Dump. For youth center, we will apply for a US Department of Health and Human Services Child Care and Development Block grant to fund the daycare center and preschool. Additional funding for the renovation of the building will likely come from USDA Rural Development Community Facility funds. The FBIC Department of Environmental Protection (DEP) plans to contribute $10,000 from its Tribal Response Program to assist with cleanup grant activities (Attachment A).

1.c.ii. Use of Existing Infrastructure (5 points)

Each of our priority sites represents an opportunity to utilize existing infrastructure and city services. With the exception of the Old Agency Dump site, additional primary right of way infrastructure would not be needed for any of our priority brownfield sites, as we are focusing on assessing in-fill properties within the city limits and established communities. A solar power plant would be required at the Old Agency Dump site to make power and the electrical grid for power distribution. FBIC plans to work with GRID Alternatives’ National Tribal Program, which helps tribal communities across the United States achieve renewable energy goals. GRID will help identify funding sources in addition to the DOE grant programs identified in Section 1.c.i.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (40 points)**

**2.a. Community Need (25 points)**

2.a.i. The Community’s Need for Funding (5 points)

Due to the unique relationship Reservation residents have with the United States government and its treaty obligations, FBIC does not tax its members. The tribe does not have a sound financial basis to fulfill the basic human needs of our members, which means we have no funds for cleanup, and redevelopment of brownfields projects. There are approximately 3,000 tribal members living on the Reservation limiting financial resources. Our Reservation has very few retail establishments, and most of the wages earned on the Reservation are spent in neighboring towns between 50 and 200 miles away, off the Reservation. FBIC is a very low-income population as well as a young population, limiting the number of people in the workforce. On the Reservation, 44% of the population is under the age of 18[[8]](#footnote-8), compared to 21% for the state of Montana.[[9]](#footnote-9) The per capita income is $12,488 per year while the Montana per capita income is $31,151 per year.[[10]](#footnote-10) Our tribe continues to be challenged with a poverty rate of 51% and more than half of children under 18 live in poverty (62%). Female householders with no spouse present represent 46% of the households on our Reservation. Cleanup and redevelopment of the Lodge Pole School would allow us to help single mothers struggling to find childcare and after-school programs for their children. The Youth Center would serve as a safe, educational facility for the large percentage of our population that is below the age of 18 and living in poverty. The development of solar energy at the Old Agency Dump site would serve to offset energy costs for residents plagued with poverty. An Disaster and Emergency Response Center at the Old Water Treatment Plant would help our communities to avoid losses from natural disasters and subsequent repairs to area homes and buildings that we cannot afford to make.

2.a.ii. Threats to Sensitive Populations (15 points)

1. *Health or Welfare of Sensitive Populations (5 points)*

Drug abuse and suicide both plague youth on our reservation at alarming rates. In 2016, the Fort Belknap Indian Community declared a State of Emergency related to methamphetamine and other dangerous drugs. Indian Health Service officials estimate that between 2011 and 2015, dependence on meth and other psychostimulants more than tripled for tribal members in Montana.[[11]](#footnote-11) Drug use is seen in children as young as third grade, because they are exposed to drugs at home through family members.[[12]](#footnote-12) Boredom is cited as one of the reasons for trying meth. Cleanup of vacant buildings such as the Water Treatment Plant and the Sacred Heart Church reduces the number of blighted buildings where youth may go to get high. The increased rate of drug use also leads to a high rate of suicide. The Montana American Indian suicide rate is about 28.5 deaths per 100,000 people, as compared to 13.9 per 100,000 for the U.S. population[[13]](#footnote-13). Additionally, Native American youth in Montana die from suicide at a rate five times higher than other groups between ages 11 to 24 statewide[[14]](#footnote-14). In 2019, Fort Belknap declared a State of Emergency to request help addressing our high rates of suicide that were occurring almost daily. Most suicides that are attempted and completed on our reservation our occurring in our young people ages 18-22. “Suicide contagion,” drug abuse, isolation on the reservation, and the effects of social media have all been listed as contributing factors to the high rate of suicide.[[15]](#footnote-15) Creating the Youth Center at the former Lodge Pole School will provide kids with a safe place to be educated about the effects of drugs and alcohol and suicide prevention. It will help prevent boredom and feelings of isolation for school-aged children. Studies have shown that youth that participated in an after-school program with a suicide prevention curriculum were 65% less likely to consider suicide, 48% less likely to plan a suicide, and 67% less likely to attempt suicide than before the program.

1. *Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 points)*

The population of the Fort Belknap Indian Community has a greater than normal rate of cancer. The rate of cancer diagnosis (all types per 100,000 people from 2006 to 2015) in the Fort Belknap Indian Community is 564, higher than the Montana rate of 457. Lung cancer is the most common type of cancer diagnosed. Lack of safe public spaces may contribute to this rate as residents are exposed to asbestos used in building materials. The primary contaminant of concern three of our four sites is asbestos, a known carcinogen that can lead to lung cancer. By cleaning up the Lodge Pole School, Water Treatment Plant, and Sacred Heart Church, we will provide safe, asbestos-free community spaces.

Residents and children on our reservation are getting diabetes at an alarming rate. Due to our persistent poverty and a need to cut grocery costs as much as possible, many of our diets are made up of primarily processed foods. Many on our reservation are overweight and at risk of diabetes and other diseases. Parents are increasingly concerned with the obesity rates in schools. Nearly 60 percent of the students are in the abnormal weight category.[[16]](#footnote-16) Offering a summer food program for kids and providing adult education courses in gardening, canning, and food preparation at the former Lodge Pole School can help combat obesity and diabetes in our residents.

1. *Promoting Environmental Justice (5 points)*

FBIC has been deeply affected by mining impacts to our water. The former Zortman-Landusky gold mine sits adjacent to the Fort Belknap Reservation and the community of Lodge Pole. The USDA Natural Resource Conservation Service considers the Zortman-Landusky area one of only seven areas in Montana as an environmental justice community due to pollution of mine tailings. More than a dozen cyanide spills occurred during the life of the mine from 1979-1988, including one spill that released 50,000 gallons of cyanide solution, contaminating a domestic water supply on the Reservation. In the early 1990s the State of Montana, FBIC and EPA filed suits against Pegasus Gold for impacts to water resources due to long-term water quality violations, including cyanide, acids and metals. Pegasus Gold, is now bankrupt and there is limited funding to continue water treatment indefinitely, which is the only treatment option. Multiple streams in the Little Rocky Mountains continue to be polluted with metals from acid mine drainage. Health problems from asthma and emphysema to thyroid problems and diabetes have been on the rise on our reservation for the past 25 years, especially among children. Other health impacts possibly associated with the former gold mining, such as lead poisoning and chemical burns from swimming in the water that flows out of the mining area, have also been reported. In February 2021, Montana DEQ approved a mining company called Blue Arc’s plan to remove 1,000 tons of rock from an old Pegasus mine without consulting with FBIC or considering how impacts from the mining would affect our residents and natural resources. Cleanup and redevelopment of the former Lodge Pole School would provide additional resources and improve the quality of life for Lodge Pole residents suffering from environmental injustice.

***2.*b. Community Engagement (15 points)**

*To conserve space, you may present information for 2.b.i and 2.b.ii in the same response.*

2.b.i. Project Involvement (5 points) AND 2.b.ii. Project Roles (5 points)

FBIC will work with area organizations and other tribal departments to educate residents and solicit input related to planned site cleanups and reuse/redevelopment. The table below lists select organizations and their commitments for this grant.

|  |  |  |
| --- | --- | --- |
| **Partner Name** | **Point of Contact** | **Role in Project** |
| Island Mountain Development Group | Sean Henderson, (406) 673-3031sean.henderson@islandmtn.com | * Lead partner in Eagle Valley Estates subdivision.
* Evaluate inclusion of solar power from solar plant at Old Agency Dump into energy configurations for homes.
 |
| Fort Belknap Housing Authority | Harlan Mount, (406) 353-2601hmount@fbtha.org | * Educate homeowners at Eagle Valley Estates about solar energy; create informational pieces
 |
| Tribal Historic Preservation Office | Michael Black Wolf, (406) 353-2295mblackwolf@ftbelknap.org | * Conduct historical evaluation Sacred Heart Church.
* Evaluate historic preservation grant funding.
 |
| Nakoda Aaniiih Economic Development Corporation | Josie Cliff, (406) 353-4260Leslie.cliff@fbcedc.org | * Share project information at the Red Creek Trading Post, the one grocery store in Lodge Pole
* Facilitate public meetings at Red Creek Trading
 |
| Opportunity Link | Barbara Stiffarm, (406) 265-3699bstiffarm@opportunitylinkmt.org | * Identify funding sources for programs to be offered at Lodge Pole School
* Facilitate community outreach meetings.
 |
| Tribal Planning Department | Delina Cuts The Rope, (406) 353-8435Delina.cutstherope@ftbelknap.org | * Secure funding for site redevelopments
* Communicate progress to other tribal offices
 |
| Aaniih Nakoda College | Sean Chandler, (406)353-2607, Schandler@ancollege.edu | * Adult education programming at Lodge Pole School
 |
| Hays Lodge Pole School District | Reyna Monteau, 406-673-3120, rperez@hlpschools.k12.mt | * Input and coordination on curriculum and programming for Youth Center at Lodge Pole School
 |
| Fort Belknap Disaster and Emergency Services | Byard Lamebull, 406-353-4874, blamebull@ftbelknap.org | * Outreach and input on design of Disaster Response Center at the former Water Treatment Plant
 |

2.b.iii. Incorporating Community Input (5 points)

To garner the greatest community interaction, we will hold at least four community meetings (one per site) to communicate progress on the grant and receive input from residents. We will advertise meetings in the FBIC Facebook page and on the radio. Meetings will be held at the senior citizen center in Fort Belknap Agency, the current Lodge Pole School in Lodge Pole, and be coordinated with tribal council meetings. We have found these to be the best places to reach the largest audience and in turn obtain the most feedback. All public meetings will accommodate hearing and sight concerns as needed through large print publications, sign language interpretation, and use of ADA accessible facilities. Given the current COVID-19 pandemic, we will hold our meetings at a location large enough to accommodate social distancing. Additionally, we will provide a Zoom link so that individuals may participate virtually. Notes will be taken at all meetings, with comments recorded in the minutes. All comments will be reviewed and considered, and a response will be provided for all comments and sent to the individual who raised the comment or question. We will create four fact sheets to describe the assessment and abatement processes (one for each site). We will also schedule two interviews on 88.1 The Buckskin Voice, the local radio station. All communication will be in the English language as it is the primary language on the Reservation, although if the need arises, communication can be translated to the White Clay native language.

**3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS (60 points)**

**3.a. Proposed Cleanup Plan (10 points)**

*Former Lodge Pole School* – The eleven ACBM inside the school would be abated with the building intact. Due to the presence of pigeon guano and mold at the school, disinfecting all surfaces would be required prior to abatement. Roofing materials would not be abated and would be managed in place. The LBP in the school will be managed in place and painted with an encapsulating paint. Pigeon guano would be removed and disposed of at the Class II landfill using wet methods to control dust generation. All guano and will need to be wrapped with 6-mil plastic before transport to the landfill. When cleaning guano from non-ACBM flooring, there is the possibility that the contaminate will have permeated into the wood flooring. If so, the floors may need to be cut out and containerized for disposal. Mold contaminated surfaces are to be cleaned. If cleaning is not able to sufficiently remove the contaminated material or is impractical, contaminated surfaces are to be removed and disposed of as hazardous waste along with the asbestos waste generated during the abatement. PCB light ballasts and mercury-containing thermostats in the school would be removed and disposed of in accordance with solid waste regulations.

*Former Water Treatment Plant* – The ABCM in the plantwould be abated with the buildings intact. The drywall in the offices and storage room is regulated and will need to be abated in accordance with 40 CFR Part 61, subpart M. Pigeon guano would be removed and disposed of at the Class II landfill using wet methods to control dust generation. All guano and will need to be wrapped with 6-mil plastic before transport to the landfill. All existing drums will be removed prior to renovation. The unlabeled drums will need to be identified and labeled. The drum that is under pressure and “overpacked” will need to be relieved of pressure prior to being identified and labeled. The tanks and piping inside of the Plant will be emptied and removed. PCB light ballasts in all three buildings would be removed and disposed of in accordance with solid waste regulations.

*Sacred Heart Catholic Church* – The asbestos-containing boiler jacket in the church would be abated. LBP door systems and window frames will be repaired and painted with a lead-encapsulating paint. Soil containing elevated concentrations of lead around the perimeter of the Church would be removed and disposed of at the local Class II Landfill. Prior to excavation of these soils, a 10-point composite surface soil sample from 0-6 inches around the buildings will be collected and analyzed for total lead by the Toxicity Characteristic Leaching Procedure (TCLP) Method (EPA Method 1311). The TCLP result would be compared to hazardous waste TCLP lead threshold of 5.0 mg/L. If below 5.0 mg/L, the soil can be disposed of at the local landfill. Pigeon guano would be removed and disposed of at the Class II landfill using wet methods to control dust generation. All guano will need to be wrapped with 6-mil plastic before transport to the landfill. When removing guano from flooring, there is the possibility that the contaminant has permeated the wood flooring. If so, the floors may need to be cut out and containerized for disposal.

*Old Agency Dump* – Surfaces soils in three distinct areas (auto salvage area, and northern and southern trench areas) would be excavated to a depth of two feet to remove areas impacted with PCP and DEHP. Approximately 900 cubic yards of soil would be excavated and disposed of at the Hill County Class II landfill outside Havre, Montana. After soils are excavated, confirmation samples will be collected from the sidewalls and bottom of the excavations at a frequency consistent with DEQ regulations. Once confirmation samples indicate remaining soils do not contain contaminants of concern above SSSLs, the excavations will be backfilled and reseeded.

**3.b. Description of Tasks/Activities and Outputs (25 points)**

*1. Cooperative Agreement Oversight* – Our goal is to complete our cleanup project within three years of receiving grant funds. To do this, we will issue a Request for Proposals (RFP) for a Qualified Environmental Professional (QEP) within one month of award. Submitted proposals will be reviewed and scored by members of our Natural Resources Committee. Our Environmental Department will update the tribal council members on progress quarterly; coordinate with EPA; update Assessment, Cleanup and Redevelopment Exchange System (ACRES) quarterly; prepare EPA quarterly reports; facilitate site access; attend national Brownfields conferences and the Tribal Lands Forum; and perform general grant management. *Anticipated Schedule:* December 2022 – September 2025. *Task Lead:* Grantee. *Outputs:* 1 QEP hired; 12 quarterly tribal council updates; 12 EPA quarterly updates; 12 ACRES updates; 2 National Conferences.

*2. Marketing & Community Outreach* – FBIC and the QEP will develop a Community Relations Plan (CRP); prepare 4 fact sheets; hold 4 public meetings; create opportunities to engage the local press; maintain project information on our website (ftbelknap.org); and post updates on the project on our Facebook page. *Anticipated Schedule:* December 2022 – September 2025. *Task Lead:* Grantee & QEP. *Outputs:* 4 fact sheets; 4 public meetings; 8 Facebook updates.

*3. Cleanup Planning and Oversight* – Before initiating any work, the QEP will draft a Quality Assurance Project Plan (QAPP). For each of the four projects, the QEP will finalize the draft ABCA; write a Clearance Sampling and Analysis Plan (SAP); create a project bid manual; and organize a bid walk. The QEP will also conduct clearance sampling to ensure no asbestos remains in the air or on building surfaces and contamination in soil has been fully excavated. Once cleanup is complete, the QEP will prepare a Cleanup Completion Report certifying all abatement and cleanup was completed in accordance with EPA requirements. *Anticipated Schedule:* December 2022 – September 2025. *Task Lead:* QEP (instead of grantee due to experience/expertise). *Outputs:* 1 QAPP; 4 final ABCAs; 1 CRP; 4 Clearance SAPs; 4 project bid manuals; 4 Cleanup Completion Reports.

*4. Cleanup* – Supervised by the QEP, a licensed asbestos abatement contractor will remove ACBM, encapsulate LBP, and remove mercury thermostat switches at the school, plant, and church sites. A contractor will remove the tanks, drums, and piping at the plant. An excavation contractor will remove contaminated soils at the Old Agency Dump site. *Anticipated Schedule:* April 2023 – June 2025. *Task Lead:* QEP (instead of grantee due to experience/expertise). *Outputs:* 13 ACBM abated; 978 yds3 of contaminated soil removed; 20 LBP window systems encapsulated; 8 drums and 1 tank of hazardous materials removed; 175 PCB-containing light tubes removed; and 2 mercury thermostats removed.

**3.c. Cost Estimates (20 points)**

*Applicants will consolidate information for 3.c.i – 3.c.iii into one response. Reviewers must evaluate the response against the sub-criteria outlined below.*

3.c.i. Development of Cost Estimates (10 points)

3.c.ii. Application of Cost Estimates (5 points)

3.c.iii. Eligibility of Cost Share Activities (5 points)

The following table presents the project budget. FBIC is requesting a waiver of the 20% cost-share requirement. As shown in the table, 94% of the funds requested would go toward cleanup planning, cleanup, and cleanup oversight.



**3.d. Measuring Environmental Results (5 points)**

Each quarter completed project deliverables and outputs will be compared to our quarterly schedule for the grant and be reported in our quarterly report. All outputs will also be reported in ACRES quarterly. If any obstacles arise in completing a deliverable, we will discuss the situation with our EPA project officer and develop a plan to achieve the output in our workplan. Outcomes will be tracked and measured by quarterly meetings with the tribal planning department, even after the grant has been closed out. Anticipated outputs for this grant include: 4 fact sheets, 4 public meetings, 1 QAPP, 4 Clearance SAPs, 4 bid manuals, 13 ACBM abated; 978 yds3 of contaminated soil removed; 20 LBP window systems encapsulated; 8 drums and 1 tank of hazardous materials removed; 175 PCB-containing light tubes removed; and 2 mercury thermostats removed. Anticipated outcomes for this grant include: 1 youth center; 330 youth served; 4 new DES jobs created; $2.8 million net savings in home energy costs; $3.5 million leveraged in redevelopment funding; and $10,000 of annual increased tourism revenue.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (30 points)**

**4.a. Programmatic Capability (15 points)**

*To conserve space, you may present information for 4.a.i. and 4.a.ii. in the same response.*

4.a.i. & a.ii. Organizational structure (5 points) and Description of Key Staff (5 points)

Our FBIC Environmental Protection Department (EPD) has the track record, capability, and administrative capacity to successfully manage a brownfields cleanup grant. The FBIC EPD formed in 1991, and we currently employ 9 full-time staff members.

Ms. Ina Nez Perce, DEP Manager, has led the DEP since YEAR and will be will responsible for overseeing the grant and certifying that all program requirements, objectives, and deadlines are met. Ms. Nez Perce has successfully managed numerous EPA grants from programs including Performance Partnership, Climate Change, and Brownfields Tribal Response. She serves as the Quality Assurance Officer for QAPPs and ensures staff and contractors maintain and adhere to quality control procedures. Ms. Nez Perce will direct and assist DEP staff in public involvement, education initiatives, and outreach.

Kermit “Dale” Snow, Jr. has served as the Environmental Compliance Officer for the FBIC Brownfields program since 2001. Mr. Snow will ensure all cleanup planning and cleanup efforts comply with tribal and federal regulations. He will review all planning documents and reports and will be responsible for directing the QEP and contractors on specific cleanup tasks and field work.

Mr. Snow will also participate in public outreach and stakeholder meetings.

William Cochran has held the Brownfields Coordinator position for two years. Mr. Cochran will be responsible for developing and maintaining the public record for each site and will provide input on cleanup planning and cleanup tasks to the QEP and contractors. He will update EPA’s ACRES database quarterly and prepare and submit quarterly reports to EPA. Mr. Cochran will help coordinate and participate in public outreach efforts and engage local stakeholders.

Charlotte Lamebull, Chief Finance Offer for FBIC, will serve as our budget manager for the grant. Ms. Lamebull is responsible for daily accounting functions and preparation of financial reports consistent with Generally Accepted Accounting Principles. As recipients of multiple federal grants and state funds, FBIC has implemented internal controls consistent with OMB Circulars A-110, A-122 and A-133. Ms. Lamebull will ensure timely draws of grant funds monthly, as well as accurate financial reporting of grant expenses.

4.a.iii. Acquiring Additional Resources (5 points)

Environmental expertise will be contracted to support certain public involvement functions, conduct cleanup planning, cleanup oversight, cleanup, and cleanup reporting. All contracts with contractors who are selected as part of this grant will be completed and consistent with our tribal procurement process which includes applicable and competitive Procurement Standards in 40 C.F.R. Parts 30 or 31. The QEP and cleanup contractor selections will be overseen by a selection committee made up of members of our Natural Resource Committee.

**4.b. Past Performance and Accomplishments (15 points)**

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant (15 points)

We have successfully managed federal, state, and local grants, including over $9 million in EPA grants. These include our current Brownfields Tribal Response Program, which began in 2009. In 2002, the Environmental Manager was awarded the EPA Region VIII 2002 A. Wade Vitalis Award “For outstanding work to protect the environment of the Gros Ventre and Assiniboine Tribes of the Fort Belknap Reservation.” In 2004, the Wetlands Specialist, Water Quality Coordinator, and former Wetlands Specialist were the recipients of the EPA Region VIII 2004 Frank DeCouteau Award “in recognition of outstanding efforts in developing an Aquatic Resource Protection Ordinance for the Fort Belknap Indian Community.” Our primary funding sources are the EPA, U.S. Department of Agriculture, U.S. Department of Energy, Bureau of Indian Affairs, U.S. Fish and Wildlife Service, and PPL Montana, a local utility company.

1. *Accomplishments (5 points)*

*(2) Compliance with Grant Requirements (10 points)*

1. http://www.montana.edu/extensionecon/countydata/FortBelknap.pdf [↑](#footnote-ref-1)
2. https://data.census.gov/cedsci/all?q=Fort%20Belknap%20Agency [↑](#footnote-ref-2)
3. EJScreen ACS Summary Report [↑](#footnote-ref-3)
4. FBIC 2021 – 2026 CEDS, Revised April 2020. [↑](#footnote-ref-4)
5. https://nces.ed.gov/ccd/districtsearch/district\_detail.asp?ID2=3013660 [↑](#footnote-ref-5)
6. https://www.nea.org/student-success/smart-just-policies/funding-public-schools/early-childhood-education [↑](#footnote-ref-6)
7. https://www.bgcmanatee.org/national-study-shows-boys-girls-clubs-great-investment/ [↑](#footnote-ref-7)
8. Ejscreen.epa.gov [↑](#footnote-ref-8)
9. www.census.gov [↑](#footnote-ref-9)
10. www.census.gov [↑](#footnote-ref-10)
11. http://metheffect.com/ReservationTreatment-Solutions.html [↑](#footnote-ref-11)
12. https://www.npr.org/sections/health-shots/2017/05/27/529112467/two-sisters-try-to-tackle-drug-use-at-a-montana-indian-reservation [↑](#footnote-ref-12)
13. https://dphhs.mt.gov/Portals/85/suicideprevention/SuicideinMontana.pdf [↑](#footnote-ref-13)
14. http://nativenews.jour.umt.edu/2017/reaching-out-flathead/ [↑](#footnote-ref-14)
15. https://www.kxlf.com/news/montana-news/2019/07/25/fort-belknap-leaders-discuss-state-of-emergency-due-to-increase-in-suicides/ [↑](#footnote-ref-15)
16. http://nativenews.jour.umt.edu/2013/?page\_id=24 [↑](#footnote-ref-16)