Narrative Information Sheet:

1. **Applicant Identification:** Choctaw Nation of Oklahoma
   
   PO Box 1210, 1802 Chukka Hina
   Durant, OK 74702

2. **Funding Requested:**
   
   a. **Assessment Grant Type:** Community-wide Assessment Grant
   
   b. **Federal Funds Requested:** $500,000

3. **Location:** This proposal would serve a mixed tribal community located in and around Talihina, Latimer/LeFlore County, Oklahoma; located within the boundary of the Choctaw reservation. Majority of the community is held in trust for Choctaw Nation.

4. **Target Area and Priority Site/Property Information:**
   
   a. The target area is located on the border of Latimer and LeFlore counties. The community in this area is a historic district which was constructed on Choctaw Nation restricted trust land. The community encompasses 1,358 plus acres of developed and undeveloped lands, which retains historic structures dating back to the first Sanitarium for the Choctaws and Chickasaws in Indian Territory, built in 1917.
   
   b. The address of the site is: Rural Route 2 Box 1725, Talihina Oklahoma 74571

5. **Contacts:**
   
   Project Director: Lakesha Hawkins,
   
   Environmental Specialist
   
   Choctaw Nation of Oklahoma
   
   Environmental Protection Services
   
   PO Box 1210, 1802 Chukka Hina
   
   Durant, OK 74701
   
   Phone: (580) 642-6753
   
   Cell: (580) 740-1512

   Chief Executive/Highest Ranking Elected Official: Chief Gary Baton
   
   Chief Gary Baton,
   
   Chief of the Choctaw Nation of Oklahoma
   
   PO Box 1210 / 1802 Chukka Hina
   
   Durant OK 74702
6. **Population:** Total tribal population of the Choctaw Nation of Oklahoma is approximately 235,365.

7. **Other Factors Checklist:**

<table>
<thead>
<tr>
<th>Other Factors</th>
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<tbody>
<tr>
<td>Community Population is 10,000 or less.</td>
<td>9</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
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<td>The priority brownfield site(s) is impacted by mine-scarred land.</td>
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<td>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).</td>
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<td>The priority site(s) is in a federally designated flood plain.</td>
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<td>The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.</td>
<td>7</td>
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<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.</td>
<td>13</td>
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Project Area Description and Plans for Revitalization

IV.E.1.a.i. Target Area and Brownfield

Choctaw Nation of Oklahoma’s (CNO) reservation is positioned in lush, green Southeastern Oklahoma. CNO has an approximate global population of 235,365, with relatively 47,951 tribal members who live within the reservation boundaries. Much of the reservation is extremely rural with no major metropolitan cities within the reservation boundaries. CNO reservation, reaffirmed in 2020 by the US Supreme Court, encompasses more than 11,000 square miles or over 6.9 million acres. The boundaries for our reservation include the state of Arkansas on the east, the Red River along the south, and the South Canadian, Canadian, and Arkansas Rivers to the north. The western boundary generally follows a line slightly west of Durant, and then due north to the South Canadian River. CNO tribal members live in community pockets alongside non-tribal members of all ethnicities. There are also non-member Indians who live in these pockets as well. Choctaw children attend public schools, and tribal member’s lives are inseparably tied to the lives of all other community members. The Choctaws homeland was originally in modern-day Mississippi and Alabama. In 1830, the federal Indian Removal Act was signed into law forcing many Southeastern Indians onto what would later become known as the Trail of Tears. Upon the fraudulent signing of the Treaty of Dancing Rabbit Creek in 1832, the federal government abandoned the Choctaws to begin the removal process from Mississippi to modern-day Oklahoma. This destroyed our clan systems and resulted in thousands of deaths along our way. Later, the Dawes Act of 1887 authorized the President of the United States to further stripped Native American Tribes of their lands and divided it into allotments for individual tribal members. This obliterated much of what remained of tribal life until a resurgence of tribal pride during the 1970’s. Choctaws established a capital in the heart of the reservation near the present-day town of Talihina. Our counsel house still stands to this day and the surrounding grounds hosts a large annual homecoming celebration. Tulli-hena is the Choctaw word for the railroad (Iron Road) which reflects the importance of the Frisco Railroad that came to town in 1886, and sometime after that the spelling of the town’s name was changed to its present form. Talihina is positioned between the mountains, with the Kiamichi Mountains to the South, the Winding Stair Mountains to the North, and the Potato Hills to the west. Talihina is also known as the gateway to the Talimena Scenic Drive and the Ouachita National Forest. There are several lakes, streams, rivers, camping facilities, equestrian camps, hiking trails in the area and Choctaw history is deeply rooted here. The old BIA Talihina Indian Hospital (OTIH) campus community is located approximately 2 miles west of Talihina. The OTIH campus community is centrally located among many Choctaw speaking traditional communities; adjacent to the Latimer and LeFlore county lines, within census tract 873.

IV.E.1.a.ii. Description of Priority Brownfield Site(s)

There are three areas of concern within the target area; the old hospital building #201, associated medical waste dumps found around the outer limits or outside of the campus community but within the 1,358 approximate acres of the target area, and the associated historic 1917-1941 housing units located within the community. In 1912, Congressman Carter of Oklahoma secured congressional appropriations for the construction on an Indian hospital to serve the Choctaw and
Chickasaw tribes in southeastern Oklahoma. To accommodate this facility, four sections of unallocated federal land, located just west of Talihina, was transferred to the U.S. Indian Service for the construction of a tuberculosis sanatorium. One of the first hospitals built specifically for Indian people in the US, it was constructed in 1917. Originally named the “Carter Hospital” after its congressional benefactor, it was officially dedicated as the “Choctaw-Chickasaw Sanatorium” when it opened in 1917. The facility quickly became the center for medical care in southeastern Oklahoma and soon after its opening, the facility was remodeled as a general hospital with a tuberculosis wing. Between 1921 and 1925 additional buildings were added to expand medical care. They included cottages for the superintendent, employee’s cottages, a school building, commissary, livestock stables, and garages making the campus at that time virtually self-sufficient. In 1935, Congress passed the Emergency Relief Appropriation Act, which established a Works Progress Administration (WPA) for employing the jobless. The WPA put Choctaw men to work to complete the 1937 OTIH campus needed updates. The new campus came at the cost of many of the original buildings associated with the 1917 hospital. In 2005, the OTIH community campus and most of the remaining buildings were designated by the Oklahoma State Historic Preservation Office as eligible for inclusion on the National Register of Historic Places (NRHP) and as a historic district. From 2005 to present the Choctaw Nation continues to add new buildings around the historic campus and community. CNO has determined there is a high potential for hazardous substances including lead-based paint (LBP), asbestos, and polychlorinated biphenyls (PCB’s) among others. Hazardous contaminants at the sites stem from the original materials that were used to construct the original 1917 and 1937 hospital campuses based on the building materials available at the time. During the 1930’s lead-based paint and asbestos were commonly used for painting interior and exterior surfaces and as fire-retarders and many of the original building materials are still present. After 2003, the original hospital (Building #201) has been vacant and unused, each year falling farther into disrepair. Many of the original windows and interior and exterior painted surfaces are still left, which indicates there is the potential for lead-based paint and lead to be present at the site. Windows have now been broken out and the roof has continued to leak so every time it rains or there is harsh weather, the hospital building becomes more unstable and more important to address. Since we have several sites which are vacant at the hospital community campus and dumped medical waste material, there runs a high risk of mold and an ever-present potential for hazards to migrate on and off site. There is also a risk of finding RCRA metals within the soil around the community due to potential contamination from the various historic housing, medical activities practiced at both historic campuses, and the dumped materials. The old hospital and many of these historic houses are unused due to suspected contamination present in some of the buildings. Currently, there are basketball courts, playgrounds, and outside community areas located within the old hospital community for the enjoyment of current medical staff still living on campus. Lake Carl Albert is located approximately one mile northeast, as the crow flies, from the community. Lake Talihina is located approximately 1.6 miles north-northeast, as the crow flies, from the community. Lakes Carl Albert and Talihina, located upwind, are both considered drinking water sources for the area, and along with Rock Creek, located down
gradient, are headwaters that leads into the Kiamichi River, a foundational river for Southeastern Oklahoma. The Kiamichi has several impacted species that call it home who are both threatened and endangered. There are also associated medical waste dumps located around and outside the campus community that need to be tested, cleaned up and disposed of properly.

IV.E.1.b.i. Revitalization of the Target Area

Our focus this year is about revitalizing and memorializing an invaluable piece of our history! Each individual member within our Nation have either attended appointments or can trace a family member who may have been a patient at the Sanitarium, OTIH campus, or used health programs at the OTIH campus. The OTIH community campus is an invaluable asset to our Nation’s history and is forever entwined with Talihina village and areas surrounding it. Our redevelopment strategy is simple; to historically restore the hospital campus and redevelop the site into a potential historic landmark and to safeguard our history for our tribal members and any of the visitors to Talihina. Phase I’s and Phase II’s will be performed to determine where contamination levels begin and end. Since this area is so culturally and historically significant, the future goal for this site is to eliminate all contamination and establish a heritage site for the CNO. Once cleanup has occurred and after all environmental issues have been dealt with, plans will be developed for the use of Native plants, repair original stonework, and move the project into the reconstructive phase. Renewable energy projects for this site have not been fully explored at this time, but if awarded, CNO would further research renewable energy resources available to this property to be used in redevelopment. We have initially investigated using geothermal and other types of energy sources for redevelopments in this community. CNO has already shown a commitment to using renewable energy in some of our other properties like on the Jones Academy Campus located in Hartshorne, OK. Certain parts of the OTIH have flat roofs and are accessible, which could incorporate solar energy possibilities. Choctaw Nation will also plan to use any phytoremediation if applicable.

IV.E.1.b.ii. Outcomes and Benefits of Reuse Strategy

Choctaw Nation Brownfields is dedicated to not only improving public health in this area but planning an assessment, cleanup and revitalization that addresses all environmental concerns and upholds Choctaw traditional values of creating a healthier environment for animals and plants that share the space as well. Our goal is that OTIH campus community would be a tribute to the historical significance it has played. The potential for this to be a destination for the Choctaw people to come and visit has been established by refurbishment of the historic courthouse at Tushkahoma which attracts an encouraging number of visitors throughout the year. Although this may not generate much in revenue, it is invaluable as a heritage site to CNO. Choctaw Nation would like to create a space where members and non-members of the community can come and learn about the rich and long history of the Choctaw Nation, pre-removal, and post-removal.

IV.E.1.c.i. Resources Needed for Site Reuse
This assessment grant will be used to stimulate interest in renewal of the old BIA Talihina Indian Hospital (OTIH) campus community but also to stimulate additional funding opportunities for cleanup, remediation, and redevelopment including site updates. Our brownfields program will generate interest and additional funding resources through using our 128a Tribal response program for programmatic maintenance and outreach; however, our 128a funding cannot be used for addressing site cleanup and revitalization on this scale therefore we plan to apply for a 104-k cleanup grant and other National Park Service grants for Historical Preservation, such as the Tribal Heritage Grants. It is our departments’ intention to use funds issued from this request to conduct environmental assessments within the target area along with infrastructure and marketing analysis to create a viable reuse for this OTIH campus community.

IV.E.1.c.ii. Use of Existing Infrastructure
This grant will facilitate the use or safe continued use of existing infrastructure around the OTIH campus community, such as historic walkways, historic covered wagon trails, and will create a historically revitalized community to be commemorated creating a place of beauty for our elders, children, and those who wish to remember the history which exists here. Currently, the campus community includes playgrounds, tennis courts, community spaces, and roads to access the campus. We plan to engage the community and Choctaw Nation members to fully flush out ideas from the community for this project.

IV.E.2.a.i. The Community's Need for Funding
Talihina, because it is such a small town, has very few resources. There are no full-service grocery stores located within the town of Talihina. The town arose around the railroad, OTIH campus, the old Eastern Oklahoma Tuberculosis Sanatorium, and the Labor Day festival at Tushkahoma which generates much of the business’s yearly revenue. Talihina is a highly desirable tourist destination for the sheer beauty of the mountains, the Talimena Drive, that surround it and for all the history which surrounds the town. The main source of community economic drive is the CNO Health Center that employees over 1,200 employees, and tourism surrounding the previously mentioned event and destinations. Area statistics from 2020 census show 21.8% of the population is under the age of 18, with 6.1% of the population under the age of 5, and 22.1% of the population is over the age of 65. In comparison, the State of Oklahoma has a youth population of 24.1% and 6.5% under the age of 5, and 16.1% of the population is over the age of 65. This is a rural area, which cannot afford to directly finance a major project such as the rehabilitation of the OTIH campus community or any other brownfields within their area. Given this information, Choctaw Nation is proposing to do a limited community health survey with youth, elders, and Choctaw community members to engage these various groups to gain perspectives on community health and social challenges around the area. Choctaw Nation public health associates are working on state accreditation, it could be that Choctaw Nation could reach out to the public health educators to help with this initial limited assessment. We plan to use this data to inform redevelopment planning options in years 2 and 3. Our Brownfields program also plans to hold bi-annual meetings for the third year of this grant after all
assessments and analysis is complete. The meetings will be held in Talihina, OK in our community center, which is centrally located, to update and discuss the OTIH campus community project, inform attendants, and answer any questions those in attendance may have. These public meetings will be advertised in the tribal newspaper and using a social media and digital campaign. Another type of community involvement we will implement with this grant is the use of local labor, if feasible, and supporting local Southeastern Oklahoma businesses to help with the OTIH project. We plan to add in our MOA’s and contracts that local labor, when applicable, is to be used to aid in the fulfillment of this project. This will help stimulate local economy around the Talihina area, for as long as the project is operative.

IV.E.2.a.ii. Threats to Sensitive Populations
Sensitive populations in the area are the elderly, minorities, families below the poverty line, and children. There are families who live around the OTIH campus, a CNO Head-Start facility is located within one mile, American Indian/Alaska Native pregnant women also use the CNHC for prenatal care only located half-a-mile away from OTIH, a drug rehabilitation center is located in close proximity, and an Independent Elder’s Living campus is located between the CNHC and OTIH along D1555 Rd. According to current area-wide statistics, the population of Talihina is 925, 43.6% identified as American Indian, with a median household income of $28,667 with 26.9% poverty rate. We can also look at this by comparing Latimer County and the state where poverty rates are 18.90% whereas for Oklahoma rates are only 15.2%. The population of Latimer County is 9,444. By comparison, Leflore County has a poverty rate of 21.7% and a population of 48,129. So, where Leflore County has more people living there, a greater percentage live below the poverty line. Both counties lead the state and national averages for minority, both family and individual poverty rates, and unemployment rates (Latimer: 31% and Leflore: 32.8%). According to the 2020 Economic Innovation Group (EIG) distressed communities index, Latimer and Leflore counties are #13 and #4 on the Oklahoma ranking for most distressed communities with scores of 71.1 for Latimer and 92.7 for Leflore. This project would provide temporary economic stimulus in this distressed region; as well as promote environmental justice in an area where impacts from hazards at the site are potentially compounding to not only human, but plant and animal life as well. Also, according to the 2020 EIG report minorities (Blacks, Native Americans, Hispanics, Asians, and individuals of another or multiple races) made up more than half of the population of distressed communities-56.4 percent-during the 2014-2018 period even though they represented only 39 percent of the population nationwide. Native Americans were three times more likely to live in distressed areas, more than white Americans. Thirty-seven percent of Native American’s live in distressed communities. Latimer county also experiences 41.3 drug overdoses per 100,000 population and is considered socially and economically distressed with an overall prosperity index of 4 where 5 indicates the lowest resilience in a community. For centuries, Native Americans, including Choctaws, have hunted, and gathered on and off our reservation. It is no surprise then that according to the National Tribal Toxics Council Understanding Tribal Exposures to Toxics report, tribal members are considered highly exposed based on a higher consumption of
contaminated foods and higher risk activities involving toxics. In this report it highlights and identified a potential lack of consideration on the part of EPA to consider toxic chemical exposures in commerce in previously unrecognized ways such as ecological and cultural exposure/toxicity. These activities include hunting wild game, gathering edible plants or mushrooms, and gathering for wild resources to create cultural objects or art.

IV.E.2.b.i  Project Involvement
Choctaw Nation has identified the following stakeholders for this project: Choctaw Nation Land Assessment Team, Choctaw Nation Historic Preservation offices, Choctaw Nation Land Title and Natural Resources, Choctaw Nation Cultural Department, and Choctaw Nation Risk Management, and Choctaw Nation Legal Department. We also plan to reach out to the Choctaw Nation tribal members at the previously identified times and present them with a more comprehensive plan to critique, we plan to reach out specifically to our tribal elders at our community building in Talihina. Many of those, who work in these departments are also Choctaw Nation citizens and therefore, are active in communications within our tribal communities. We have developed data that shows there has previously been community interest in the previously stated site reuse plan. Choctaw Nation also peer-models with the Oklahoma Department of Environmental Quality Brownfield program, Inter-Tribal Environmental Council-Cherokee Nation, and other tribal brownfield programs.

IV.E.2.b.ii. Project Roles
The Choctaw Nation Land Acquisition Team (LAT) oversees developments within the Choctaw Nation reservation. This team is comprised of a representative from the following departments: legal, cultural, historic preservation, risk management, land and title offices, natural resources, real-estate development, Assistant Chief and/or Chief’s office, member services, housing authority, GIS (Geographic Informational Services), emergency management, information technology, appraisals, business and marketing, safety department, and strategic development. This comprehensive LAT team undertakes each development project which comes to Choctaw Nation, and both evaluates department activities and needs for the project. They meet monthly to follow up with both developing and current projects. Each identified stakeholder will also meet with the Brownfields Program separately from the LAT process to receive updates on portions of those specific areas where their expertise will be needed for project implementation and input.

IV.E.2.b.iii. Incorporating Community Input
Our strategy for success starts with the continued use of our programmatic website. CNO has a public brownfield list which is located on www.choctawnation.com/choctaw-nation-brownfields-program. We have outreach information, our public list, and other programmatic publications located on this site which informs site visitors as to what exactly is a “brownfield site” and informs them of grant activities. We also report all applicable site activities on ACRES (Brownfields Assessment, Cleanup, and Redevelopment Exchange System). Our department
plans on including this community-wide assessment grant activity as part of our ongoing social media and other digital campaigns. Later, after we have an accurate picture of contamination levels, locations, and marketing data for the community, CNO will host bi-annual meetings, at least, with the members of the community and surrounding area to discuss reuse options. For this project funding request, our department will also partner and coordinate with internal departments to facilitate limited community health assessments using interviews or consensus discussions from Tribal members from the Talihina area using public health educators at coordinated events. Community engagement will also likely result from infrastructure and marketing analysis which will either be conducted internally or with the assistance of a contractor. Any communal input on this project will be considered and responded to in an intentional way. Any in-person meetings planned, in the event of an increase in Covid-19 cases, will be moved to a virtual platform.

IV.E.3.a.i. Project Implementation
We will complete a Phase I ESA and Phase II ESA at the target areas within the identified community. Phase II assessments will include both ASTM-Phase II ESAs and inspections for asbestos, lead-based paint (inside and out), PCB (Polychlorinated biphenyls)’s, RCRA (Resource Conservation and Recovery Act) metals in soil, medical hazardous waste dump sampling, and any Lead-based paint risk assessments or Asbestos management plans needed. There is a potential of dumped medical waste locations existing beyond the boundaries of the community boundaries, this potential will be explored, all inter-target and external target area dumps identified, and assessed for potential hazards. If any dumped material is identified external to the target area, CNO will update EPA and our grant deliverables. The Brownfield Coordinator will oversee activities at the sites and create reports for the Program Manager and Senior Director. The coordinator will also help to plan the limited community health assessment, market research and evaluation, a historic campuses cultural survey, funded by our historic preservation department, and the infrastructure evaluation for the site. Further, as the community site assessments occur, the LAT meetings will be held once a month and will be required to conform to the LAT process where each of the internal Choctaw Nation departments will perform their analysis at the community target areas. In this way, the internal departments of Choctaw Nation will support this project. The applicant will not charge any salary or fringe dollars or IDC greater than 5% and thus contributes to this funding request its own resources to carry out programmatic oversight and grant administrative activities.

IV.E.3.a.ii. Anticipated Project Schedule
The anticipated schedule for work at the site will be reliant on allocation of funding, but approximately site activities will commence around October 1, 2022 starting with the CNO bidding process. The first year we will dedicate to four main activities: enrollment of project into internal CNO Land Acquisition Team (LAT) process, initiate limited community health assessments, and updates to website and digital outreach campaigns, Phase I ESA activities, and Phase II ESAs. The second year will be dedicated to completing both the limited community
health assessments, and any additional Phase II’s around the campus uncompleted in the previous year, completing the historic campus cultural survey, continuing the internal LAT process, marketing and infrastructure analysis and evaluations. The third year will be a transition period where CNO will dedicate time to coordinating any finalizing market research and analysis, completing all outstanding grant requirements, community outreach, cleanup planning, and campus visioning (reuse planning, or solar/geothermal energy planned usage) with an indigenous-based or other minority community planning company in order to prepare for a 104k Cleanup or other grant to fulfill the next step in our process for completion of addressing the potential issues in this community. To generate interest in funding redevelopment CNO will develop a more specific redevelopment pitch report for the OTIH community.

IV.E.3.a.iii. Task/Activity Lead
Task 1- Phase I, II, and other Environmental Site Assessments: Coordinator and Project Manager will oversee our internal procurement process to solicit bids for work. Environmental leadership, project manager, and coordinator will evaluate these solicitations and use contractors for these activities as selected under the procurement and RFP (request for purchase) process. Coordinator will consult and work with CNO community health educators to facilitate a limited health assessment of the community.

Task 2- Other Cultural and Infrastructure Site Assessments: CNO Historic Preservation to provide voluntary in-kind work for historical and cultural surveys at the sites. LAT and CNO appraisals, business and marketing, safety department, and strategic development departments to facilitate contracts and provide internal knowledge for marketing analysis and infrastructure assessments contract selections or any additional needed work at site not covered under this grant.

Task 3- Outreach Activities and Associated Costs: Coordinator will plan and facilitate outreach and other tasks under this item. The coordinator or a representative will attend and conduct in-person outreach. Coordinator will also facilitate updating of the digital campaign and maintenance of the website updates.

Task 4- Analysis of Brownfields Cleanup Alternatives (ABCA) and Final reporting: ABCA report will be completed by a selected contractor using CNO’s internal RFP process. Project Manager and Coordinator will collaborate to complete a final report for environmental leadership to be presented to LAT and Tribal Council.

IV.E.3.a.iv. Outputs
Outcomes will be fully assessed sites and site reuse plans for our Tribal members and leadership. Measuring output and deliverables will be done in the form of quarterly reports, tracking billable expenses to this grant, individual assessment reports, specific environmental contaminants sampling reports (one report per contaminant), community meeting summaries, and a final cleanup plan.

IV.E.3.b. Cost Estimates
Task 1, Phase I and II Environmental Site Assessments
- **Contractual Costs** = 1 large ESA at an estimated cost of $8,000. Three Phase II ESA’s with soil, other identified sampling needed at an estimated cost of $75,000.
- **Contractual Costs** = Lead-based Paint, Asbestos, RCRA metals, Hazardous material and PCB testing and all other environmental assessments needed around the community at an estimated cost of $307,400.

Task 2, Other Cultural and Infrastructure Site Assessments
- **Contractual Costs** = 1 limited community health assessment estimated at $25,000; Market research and evaluation at an estimated cost of $75,000; and an infrastructure evaluation estimated cost at $42,480.

Task 3, Outreach Activities and Associated Costs
- **Travel and public planning costs** = 2 biannual meetings in Talihina at an estimated cost of $8,000. Outreach to be held in Talihina, Coordinator over-night stays will be needed, estimated per Diem and hotel for one = $55 + $100 (two in Year 3) = $310 plus supply costs of $3,000 and mileage estimates for travel to and from the site for onsite contractor site supervision = $ 4,690.

Task 4, Analysis of Brownfields Cleanup Alternatives and Final reporting
- **Analysis of Brownfields Cleanup Alternatives** = 1 analysis of brownfields cleanup contractor consultation and report to be proposed to community and LAT = $10,000.
- **Final Report for Stakeholders and Council** = No costs associated. Report will be sent to Council for consideration with a final estimate of cleanup alternatives and associated costs.

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Travel to brownfields-related training conferences is an acceptable use of these grant funds. EPA defines equipment as items that cost $5,000 or more with a useful life of more than one year. Items costing less than $5,000 are considered supplies. Generally, equipment is not required for Brownfields Grants. Administrative costs (direct or indirect) cannot exceed 5% of the total EPA-requested funds.

IV.E.3.c. Measuring Environmental Results
CNO has sufficient experience and practice in tracking outcomes and ensuring that Brownfields funding is well-utilized. Under our current 128a Tribal Response Programmatic grant, CNO uses quarterly reports submitted to the EPA. CNO will submit quarterly reports for all activities associated with the OTIH campus community and listed site activities. Outcomes will be
measured by completing the task activities listed in this funding request and comparing those to projected deliverables. Internal processes will be utilized to store and organize reports, photos of sites and site work, and complete additional in-kind work by non-brownfield departments. Tracking will be accomplished using internal CNO databases, Smartsheets database, excel spreadsheets, and completion of ACRES databases. CNO also updates our public brownfields list bi-annually; this list reflects the name and number of sites assessed along with any public meetings or events of significance. Our digital campaign will envelope this additional grant requirement for reporting at the OTIH campus community and will incorporate public notification requirements into the campaign and website. Further expected outcomes include but are not limited to a complete limited community health assessment, completed all proposed assessments, completed in-person or virtual outreach, a completed marketing analysis and infrastructure evaluation, and site cleanup plans.

**Programmatic Capability and Past Performance**

**IV.E.4.a. Programmatic Capability**

The CNO contract bid process follows the federal bid process and will be adhered to throughout this three-year process. CNO Post-Grant Award and Accounting departments are responsible for aiding in the tracking of financial expenditures to all environmental grants and send reports to the Program Manager monthly. Our Brownfields Coordinator and Program Manager will oversee all aspects and deliverables of this grant with supervision by the Environmental Protection Services leadership. The Brownfields and Program Manager oversee and administer all aspects of the 128a TRP grant which is also supervised by the Environmental Assessments Director under Environmental Protection Services. The Program Manager has over five years of experience working in environmental services and is the current Environmental Specialist for our programmatic grants. The Brownfields Coordinator has a Master of Jurisprudence in Indian Law and a Bachelor of Science in Biology with emphasis in Wildlife and Fisheries. The Brownfields Coordinator also has four years of experience in environmental and health-related fields. CNO also has an established network of environmental professionals which we have networked and contracted with in previous years who would be willing to assist us with OTIH community project. CNO has dedicated staff in our Financial and Grants Management to help in the facilitation and implementation of all aspects of EPA assessment or brownfield agreements.

**V.4.b. Past Performance and Accomplishments**

The CNO currently has no active EPA 104-k assessment agreements, as of November 22, 2021. However, CNO has successfully managed our 128a TRP programmatic grant awarded for $270,000 in 2017 under RP01F35401. CNO has a history of satisfactorily meeting all grant requirements including required workplans, schedules, and terms and conditions of our current 128a grant. CNO has never received an adverse audit finding on a Brownfields grant.
FY 22 Community-wide Assessment Grant

Threshold Criteria:

1. The following applicant is a federally recognized Indian tribe, as such is an eligible applicant for this community-wide assessment grant.

2. Community involvement will happen in two parts. First, during Fiscal Year 1 CNO will update its current digital campaign to include the Old BIA Talihina Indian Hospital in our digital outreach campaign while we conduct a limited community health assessment using public health educators, or equivalent job titles within the Choctaw Nation of Oklahoma, to initially evaluate public health within the community. In Fiscal Year 3, after all environmental and marketing assessments are completed, we plan to conduct public meetings which will inform the community of any contamination and present marketing information at the same time to both have accurate information and be able to navigate conversations about the redevelopment of the property.

3. Choctaw Nation of Oklahoma will employ our procurement and legal departments internally, to complete an RFP process to award any contracts for assessments completed within this community. At this time, no contractor has been procured.

4. Choctaw Nation of Oklahoma has no open balances for any previous EPA 104-K Assessment or Multipurpose Grants.