U.S. EPA FY2022 Brownfields Assessment Grant Application –
Narrative Information Sheet

1. Applicant Identification: Northern Cheyenne Tribe, P.O. Box 128, Lame Deer, MT 59043

2. Funding Requested:
   a. Assessment Grant Type: Community-Wide
   b. Federal Funds Requested:
      i. Requested amount: $448,199
      ii. Cost share waiver requested: Not Applicable

3. Location:
   a. Tribally-owned lands within the Northern Cheyenne Indian Reservation in Rosebud and Bighorn counties, Montana. The USDA Economic Research Service has identified Bighorn County as a persistent poverty jurisdiction. The principal population centers are the communities of Lame Deer, Ashland, Birney, Busby, and Muddy.

4. Target Area and Priority Site/Property Information
   a. The Target Area is Lame Deer, Northern Cheyenne Indian Reservation, Montana
   b. Census tracts – not applicable (the Target area is a town).
   c. Addresses of priority sites:
      i. Old Fox Station: address unknown; southwest corner of the intersection of U.S. Route 212 and Montana Highway 39 (Cheyenne Ave.); approx. lat/long: 45.623140° & 106.666664°
      ii. Our Store Property: address unknown; southeast corner of the intersection of U.S. Route 212 and Montana Highway 39 (Cheyenne Ave.); approx. lat/long: 45.623284° & 106.666053°
      iii. Cady’s Gas Site: address unknown; ½ block south of the southwest corner of the intersection of U.S. Route 212 and Montana Highway 39 (Cheyenne Ave.); approx. lat/long: 45.622728° & 106.666482°
      iv. Air Force Homes: Dull Knife Drive; address numbers unknown; approx. 0.3 miles southeast of the intersection of U.S. Route 212 and Montana Highway 39 (Cheyenne Ave); approx lat/long: 45.621662° & 106.661126°
5. **Contacts:**
   a. Project Director: Charlene Alden, Director, (406) 477-6506 ext. 101, charlene.alden@cheyennenation.com, Northern Cheyenne Tribe, Environmental Protection Department, P.O. Box 128, Lame Deer, MT 59043
   b. Chief Executive: Rynalea Whiteman Pena, President, (406) 477-4867, rynalea.pena@cheyennenation.com, Northern Cheyenne Tribe, P.O. Box 128, Lame Deer, MT 59043

6. **Population:** Approximately 4,040 members of the Northern Cheyenne Tribe reside on the Reservation. About 1,900 tribal members live in Lame Deer. About 410 non-tribal members reside on the reservation.

7. **Other Factors**

<table>
<thead>
<tr>
<th>Factor</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>1</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe.</td>
<td>1</td>
</tr>
<tr>
<td>The priority site(s) is impacted by mine-scarred land.</td>
<td>N/A</td>
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<tr>
<td>The priority site(s) is adjacent to a body of water.</td>
<td>N/A</td>
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<td>The priority site(s) is in a federally designated flood plain.</td>
<td>N/A</td>
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<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>N/A</td>
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<tr>
<td>The reuse of the priority site(s) will incorporate energy efficiency measures.</td>
<td>N/A</td>
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<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities (Section I.A.) for priority site(s) within the target area.</td>
<td>N/A</td>
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<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
<td>4 *</td>
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* - Colstrip, Montana Power Plants 1 & 2 closed in January 2020; Units 3 & 4 will likely close in the next 3-5 years. Although this coal-fired power plant is not located on the Northern Cheyenne Reservation, many tribal members work or worked at the facility.

8. **Letter from the State or Tribal Environmental Authority**
   According to EPA guidance, a letter from the Northern Cheyenne Tribe Environmental Protection Department (EPD) is not required since the EPD is the applicant.

9. **Releasing Copies of Applications**
   Not applicable
Narrative Proposal / Ranking Criteria - Northern Cheyenne Tribe Assessment Grant Application

I. Project Area Description and Plans for Revitalization

a. Target Area and Brownfields

i. Background and Description of Target Area

The Northern Cheyenne Tribe (NCT) is requesting $448,199 in assessment grant funds to help expand our successful brownfields program. The recent history of our people began near Hudson Bay. From there, our ancestors travelled in a southwesterly direction before eventually settling in what is now called southeastern Montana. The stunning natural landscape of our nearly 700-square-mile reservation features rolling prairies, ponderosa pines, and sandstone outcrops. More than 4,000 tribal members live on the reservation in five communities. Our administrative and cultural center, Lame Deer (target area), lies approximately 40 miles east of the Little Bighorn Battlefield, where several NCT warriors fought in the historic battle under the leadership of Sitting Bull. Our people endured numerous other encounters with U.S. military forces, as well as smallpox and cholera epidemics. We suffered a lack of food and water, the Spanish influenza, German measles, and a battle for mineral rights. Despite all these challenges, we continue to look toward a future in which our communities and citizens benefit from improved economic opportunities and a clean and healthy environment. With these basic needs met, we will have time to maintain connections to culture, language, hunting and fishing, traditional foods, and ceremonies.

Lame Deer is the largest community on our reservation, and its central hub is the high-traffic roundabout at the intersection of U.S. Highway 212 and MT Highway 39. As visitors drive across our highways, many do not stop on the reservation due to blight caused, in large part, from brownfields sites in town. Persistent poverty and lack of funds have prevented us from developing a critical mass of functioning businesses, but we aim to use EPA funds to continue to turn these difficult conditions into opportunities. Lack of adequate, safe, & clean housing is a major problem, and numerous brownfields sites are abandoned housing units unfit for occupation. The NCT is applying for additional assessment grant funding to build on our successes with revitalizing brownfields sites. Specifically, we propose to focus on portions of the community that are 1) key high-visibility sites with significant economic potential and 2) characterized by unsafe and inadequate housing. The residential properties will re-used for infill development once existing structures can be properly assessed and removed or repaired.

ii. Description of the Priority Brownfield Sites

Brownfields are apparent in every Lame Deer neighborhood, including former fueling stations, unused commercial properties, auto repair centers, open/uncontrolled dumps, hazardous waste sites, meth-impacted properties, and older abandoned or damaged home sites. Such sites are often located in close proximity to residential areas, daycare centers, community facilities, schools, health centers, wetlands, and waterways. These properties thus represent threats to both human health and the environment. Using EPA Tribal Response Program (TRP) funds, the NCT developed a comprehensive inventory of more than 150 sites, including more than 30 high-priority properties that require assessment and cleanup.

Three petroleum-impacted properties lie at the very heart of Lame Deer. The Old Fox Station, Cady’s Gas Site, and Our Store Property are situated adjacent to the new roundabout at the intersection of U.S. Route 212 and Montana Highway 39. Leaking underground storage tanks at these historical fueling stations have caused subsurface petroleum releases. Contamination, which was first documented more than twenty years ago, has impacted groundwater, soil, and soil vapor. Groundwater plumes of dissolved petroleum compounds extend beyond the property boundaries. The properties were last investigated about five years ago, none of the sites has received regulatory closure, and these prime locations remain underutilized. The sites are prime locations for new businesses. In fact, our tribe constructed the new Northern Cheyenne Commerce Center, which houses numerous small businesses, on a portion of the Old Fox Station site. The Cady’s Gas and Our Store sites remain vacant and underutilized. The NCT recently purchased the properties from private owners and can now assume control over future assessment, cleanup, and redevelopment activities. Our residents and communities desperately need to develop additional economic opportunities such as those recently provided by the Commerce Center. The locations of these sites are the most prominent on the reservation, and are visible to tourists, truckers,
and other highway travelers. Redevelopment with anchor businesses will represent an economic jump-start and will inject much-needed revenue into our communities that will serve as a catalyst for additional investment.

Research shows that families suffer when residents lack access to homes that are affordable, clean, healthy, and uncrowded. This is especially true in our communities, where many homes on our reservation are substandard; some even lack basic amenities such as functioning plumbing and sewer systems. Others are riddled with contaminated building materials, including the Air Force Homes in Lame Deer. This site consists of 16 residential units brought to Lame Deer from the Malmstrom Air Force Base. The NCT assessed five homes using assessment grant funds and is preparing to remove asbestos-containing debris from the structures using our cleanup grant funds. Funds from our previous assessment grant were insufficient to evaluate the other 11 homes, where tribal members may suffer from exposure to asbestos and lead-based paint.

b. Revitalization of the Target Area
i. Reuse Strategy and Alignment with Revitalization Plans

The NCT participates in an annual Comprehensive Economic Development Strategy (CEDS) process. Over the past four years, the community identified several critical concerns for Lame Deer. First, economic problems include a lack of commercial spaces/structures to support businesses; an inability to attract private capital; and retail leakage (consumer spending outside the Lame Deer economy due to a lack of local businesses). Second, residents identified a lack of jobs and significant uncertainty associated with ongoing and future job losses from closures of nearby coal-fired power plants. Finally, health and welfare challenges result from inadequate/unsafe housing and blighted/dilapidated properties. The NCT identified overcrowding, poor quality housing, homelessness, and contaminated housing as one of the top five health-related issues of concern. More than 50 families appear on the housing waiting list. The EPA and the NCT conducted community surveys in the summer of 2019 at the annual NCT Powwow. The highest priority of respondents was the cleanup and redevelopment of downtown Lame Deer. The 2020 CEDS document identified several potential opportunities including a tribal office supply store, a tribal bank, an agricultural business, and a travel center at Lame Deer’s roundabout.

Assessment and eventual cleanup of the priority brownfield sites will help directly address concerns identified during the community planning process. Petroleum contamination at the underutilized Old Fox Station, Cady’s Gas, and Our Store sites is standing directly in the path of redevelopment at the community’s central hub (the intersection of Highway 212 and Highway 39). Once assessed, cleaned up, and redeveloped, these three properties can serve as economic engines for Lame Deer. The proposed travel center at the roundabout will attract consumers and, in the process, provide economic opportunities, create spaces for businesses, remove blight, and provide jobs. The NCT plans to assess, clean up, and reuse multiple Air Force Homes Site structures as residences that are healthy, safe, and free from hazardous building materials. This action plan will help shorten the housing waiting list. The assessment, cleanup and redevelopment of brownfields sites is critical to realizing our community’s vision of Lame Deer: an economic driver for our reservation where tribal entrepreneurs can incubate and build up thriving businesses that take advantage of both local and transient consumers, and where residents can afford to live in healthy homes.

ii. Outcomes and Benefits of Reuse Strategy

Lame Deer is considered a disadvantaged community based on the following indicators: low-income tribal jurisdiction, persistent poverty, high unemployment, jobs lost in the energy transition, distressed neighborhoods, substandard housing, limited access to specialty healthcare, environmental stressors, and problems with water and sanitation systems. Dilapidated brownfields sites within our reservation towns, and Lame Deer in particular, have a significant negative impact on local communities. Because visitors do not observe a vibrant and welcoming town, they often move on to the next off-reservation community to fulfill their travel needs. Many of these missed economic opportunities can be attributed to vacant, abandoned brownfields sites which are eyesores along and near our travel routes.

Assessment of additional sites in Lame Deer will help clear the way for the development of three revenue-generating small businesses that create between ten and twelve jobs. These changes will help our tribe capture significant tourist and traveler revenue. Removal of blight and redevelopment of brownfields will also increase property values and create a stronger sense of community. Assessment and cleanup of several commercial properties (such as the Old Fox Station, Cady’s Gas, and Our Store petroleum sites) will improve soil,
groundwater, and drinking water quality in these locations and therefore protect public health. Assessment and eventual cleanup/redevelopment of the Air Force Homes site will result in more than 11 new affordable housing options and would help move more than 30 people off the housing waiting list. In addition, new green space to be made available at current cleanup sites will help the community become more livable, sustainable, and healthy and also provide a welcoming environment to travelers who may need to purchase groceries, fuel, and other goods. These economic, public health, environmental, and community benefits will have a direct positive impact on our disadvantaged community.

c. Strategy for Leveraging Resources
   i. Resources Needed for Site Reuse

   We believe that award of an assessment grant will stimulate the availability of other funding for assessment, remediation, and site reuse. The EPD will seek funding commitments from project partners for reuse of our priority assessment/cleanup sites. The NCT Development Corp. will provide funding to assist with redevelopment of a travel center and other businesses at the roundabout petroleum sites. The Montana Petrofund is a state-funded program that provides cleanup dollars for petroleum-impacted sites. The NCT Housing Authority will help with planned renovations at the Air Force Homes. The NCT Board of Health will provide support through the development of green spaces associated with several ongoing cleanup sites. We will also seek in-kind support from other tribal departments to advance site redevelopment using tribal personnel and equipment. We will request a continued in-kind commitment from Western Native Voice (non-profit dedicated to promoting Native leadership), which has which has provided staff support to our brownfields program. We are exploring HUD’s Indian Community Development Block Grant program and USDA’s Rural Development Community Facility fund. These programs are designed for small, low-income communities and could help with redevelopment efforts. The EPD will also approach the Eastern Montana Brownfields Coalition about the possible use of its RLF loan/subgrant program to facilitate cleanups.

   ii. Use of Existing Infrastructure

   All priority assessment sites are located within the developed area of Lame Deer and generally have access to water, sewer, power, phone, and Internet service for redevelopment purposes. Reuse of each site will take advantage of such proximity. Depending on the use of each site, public utilities may be inadequate to meet development needs. In this case, we will seek assistance from the Northern Cheyenne Utilities Corporation, which controls local water and sewer infrastructure. Assistance from the Indian Health Service would also be sought to replace water or sewer mains in Lame Deer as needed. The location of the priority sites will encourage infill redevelopment, which will in turn help reduce Greenfields development and associated vehicle emissions. The reuse of pre-existing neighborhoods, infrastructure, and roads is consistent with equitable development principles. In addition, such redevelopment within the central community will help our tribe better respond to climate change.

2. Community Need and Community Engagement
   a. Community Need
      i. The Community’s Need for Funding

      Our tribe lacks a sound financial basis to fulfill the basic human needs of our members, which means we have no tribal funds for completing assessment, cleanup, and redevelopment projects. Fees currently charged for water and wastewater services are not adequate to cover utility maintenance costs. These shortfalls are due in part to the fact that many downtown properties served by the system are unoccupied brownfields sites, and fees are not collected at these properties. In addition, due to the relationship between our reservation residents and the federal government, the NCT does not tax its members. Our tribal departments are struggling. Most funding comes from grants that must be expended on specific line items; funds often may not be shared between departments. We have no funding sources other than grants that could be brought to bear to assess the sites included in this application.

      Lame Deer and our reservation continue to experience severe problems of unemployment, low income, poverty, poor housing, and overcrowding. The poverty rate in Lame Deer is more than 27%, well above equivalent figures for Montana (15%), and the nation (16%). The target area unemployment rate is more than
40% (almost six times the state of MT), and the per capita income is $15,099 which is approximately half that of Montana. In addition, our reservation is a “persistent poverty” jurisdiction as shown in the table below.

| Persistent Poverty – Northern Cheyenne Indian Reservation Poverty Statistics |
|---------------------------------|--------------|--------------|--------------|--------------|--------------|
| N. Cheyenne Indian Reservation  | 1990         | 2000         | 2010         | 2014         | 2019         |
|                                 | 20.4%* / 35.3%* | 46.1%       | 34.8%       | 44.5%       | 27.1%       |

Source: 2013-2019 American Community Survey 5-Year Estimates. * = Data for the Reservation not available. Rates are for Rosebud and Big Horn Counties, respectively, where the Reservation is located. Some information provided by KSU TAB Resources.

To make matters worse, the local economic outlook has declined due to a nearby industrial closure. A dwindling number of tribal members work at the Colstrip coal-fired power plant just north of the reservation and/or at businesses that the generating station supports. Two of the four Colstrip generating stations shut down in January 2020. The other two power stations will likely close in the next 3 to 5 years. These closures have been and will be significant local and regional economic disruptions which are impacting the few remaining jobs.

ii. Threats to Sensitive Populations

1) Health or Welfare of Sensitive Populations

Burdens of disease, disability, and death are consistently greater in Indigenous than non-Indigenous communities, and poor health in tribal communities is linked to poverty, overcrowding, and environmental contamination. Lame Deer, whose residents are 97% Indigenous, continues to experience severe problems of unemployment, low income, poverty, poor-quality housing, and overcrowding. The relative scarcity of economic opportunities is partly to blame. Our reservation’s median household income was under $35,000 in 2018 compared to Montana ($47,200) and the U.S. ($53,900). A community survey of 300 Lame Deer residents revealed major problems with housing: 15% lacked electricity, 19% did not have hot running water, 9% lacked heat, 22% did not have a functioning toilet, and 18 to 20% lacked a sink, faucet, tub and/or shower. More than 30% of our residents are struggling with overcrowding, and the community ranked the quality of its built environment at only 3.75 out of 10. Poverty, unemployment, substandard living conditions, and dilapidated neighborhoods contribute to feelings of hopelessness, and 26% of Lame Deer high school students attempted suicide in 2015 (16% in Montana). These challenging conditions are likely associated with increased rates of substance abuse in Lame Deer compared with the rest of Montana. Assessment of all of the priority sites will help address our health and welfare challenges. Our vision for the Old Fox Station, Cad’s Gas, and Our Store sites as high-visibility anchor businesses will provide local revenue, reduce retail leakage, and create much-needed jobs. Renovated and/or rebuilt Air Force Homes will expand housing options.

2) Greater than Normal Incidence of Disease and Adverse Health Conditions

Petroleum releases often contain high levels of benzene, which causes leukemia and other cancers. The Old Fox Station, Cad’s Gas Site, and Our Store Property are all associated with subsurface benzene-containing plumes of dissolved petroleum constituents. In addition to contamination of soil and groundwater, these conditions pose vapor inhalation risks to future construction workers and employees of businesses that may choose to relocate or open in this high-visibility economic development area at the Lame Deer roundabout. Assessment and cleanup of this contamination will reduce exposure of sensitive populations and our disadvantaged community to benzene and other toxic petroleum compounds.

Asthma is one of the most common types of chronic respiratory problems on our reservation. As the third-highest chronic disease diagnosis at the IHS hospital in Lame Deer, almost 20% of 10 to 14 year old children received an asthma diagnosis in 2015. Our homeland is an air quality non-attainment area for PM10, and the area is consistently unable to meet EPA air quality standards. Our brownfields sites exacerbate air quality problems when asbestos is released from dilapidated buildings that burn or are left in complete disrepair. Lung cancer is the third most common cancer on our reservation and asbestos causes lung cancer, asbestososis, and mesothelioma. Our members suffer from many types of cancer, including lung cancer, at higher rates and with more deaths than in the rest of the Montana population.

Many of our residences, such as the Air Force Homes, are substandard structures that contain asbestos, lead, mold, and poor indoor air quality. Environmental exposures to lead impact poor children and minorities at much higher rates than the rest of the population. Maternal exposure to lead in substandard homes likely increases the risk of preterm birth (e.g., in the Air Force Homes).
Tribal members in Montana, including on our reservation, die between 15 and 20 years sooner than their non-tribal counterparts. Only 4% to 8% of our residents are over age 65, which reflects our lower life expectancy. Exposure to brownfields-related contaminants and cumulative health problems exacerbates this situation.

Assessment and cleanup of these and other residential structures will 1) provide safe and healthy housing that is free from asbestos, lead-based paint, and associated cancer risks; 2) improve Lame Deer air quality, which will reduce the incidence of asthma, COVID-19, and other respiratory problems; 3) improve life expectancies; 4) reduce the incidence of pre-term births; and 5) reduce safety concerns.

3) Promoting Environmental Justice (EJ)

EJ indices for the target area reveal how Lame Deer compares to the state of Montana with respect to the number of low-income Indigenous residents who experience disproportionate environmental exposures (e.g., air toxics, particulates, lead-based paint, cancer risk, and nearby hazardous wastes). Compared with the rest of Montana, EJ indices are > 92nd percentile, indicating that our town experiences significant excess risk that contributes to greater pollution burdens on our disadvantaged community. EJ remains an unfulfilled goal on our reservation: Lame Deer and its low-income tribal residents experience adverse human health and environmental impacts, conditions which exacerbate economic challenges. In addition, many of our members are more susceptible to effects from environmental hazards because of existing medical conditions (diabetes, cancer, asthma), restricted access to health care, and substandard housing. Our members often have a reduced ability to participate in environmental decisions because of limited access to technical resources, challenges with communication and transportation, and language barriers. With respect to federal government action, the Malmstrom Air Force Base contributed to our problem of substandard housing by providing us with homes later determined to contain asbestos and lead-based paint.

The assessments proposed in this application will directly mitigate environmental injustice on our reservation. All activities will be carried out in Lame Deer, a town that houses and serves a low-income Indigenous community. Environmental, public health, and economic benefits realized during the project will accrue to those that need help the most. Our public involvement strategy will help ensure that residents will not only benefit from, but will participate in, decisions that will shape Lame Deer for the better. Our ongoing brownfields programs are helping provide opportunities for businesses, access to jobs, and more affordable and safe housing options. One of our principal goals for the assessment grant is to reduce human health and environmental risks while providing our people with concrete economic opportunities. For example, the proposed travel center would reduce human health and environmental risks while providing much-needed space for business start-ups and jobs in a prime retail location.

b. Community Engagement

i. Project Involvement and ii. Project Roles

Community involvement will be critical to the success of the assessment grant project and eventual cleanup and redevelopment of our high-priority sites. The NCT has developed strong partnerships with a variety of local organizations; the table below provides details of those that will be involved with the project.

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>POC (name, email, phone)</th>
<th>Specific Project Role/Involvement/Assistance</th>
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<tbody>
<tr>
<td>NCT Board of Health</td>
<td>Eugene Little Coyote; <a href="mailto:director@ncttribalhealth.org">director@ncttribalhealth.org</a>; 406-477-4900</td>
<td>Prepared Community Health Assessment; assist with decisions regarding how to prioritize assessments that will improve health outcomes.</td>
</tr>
<tr>
<td>Eastern MT Brownfields Coalition</td>
<td>Tori Matejovsky; <a href="mailto:tmatejovsky@gnde.org">tmatejovsky@gnde.org</a>; 406-653-2590</td>
<td>Discuss the provision of RLF subgrants to NCT for cleanups of assessed sites.</td>
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<tr>
<td>Tribal Employment Rights Office</td>
<td>Dominic Ortega; <a href="mailto:dominic.ortega@cheyennenation.com">dominic.ortega@cheyennenation.com</a>; 406-477-6287</td>
<td>Match unemployed individuals and/or firms with potential jobs related to brownfields sites; monitor proper implementation of Indian Preference policies.</td>
</tr>
<tr>
<td>Western Native Voice</td>
<td>Krystal Hill; 406-869-1938; <a href="mailto:info@westernnativevoice.org">info@westernnativevoice.org</a></td>
<td>Strengthen our program by providing in-kind labor support; assist with gathering community input for decisions re: assessment/reuse.</td>
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</table>
iii. Incorporating Community Input

The EPD will use regular Tribal Council meetings, Tribal District meetings, our web site, email, regular mail, social media, agency announcements, and bulletin boards in high-traffic areas to inform community members on a monthly basis about project updates and planned meetings, workshops, and events. We will engage with and inform community members with disabilities, the elderly, residents without telephones or Internet service, and those without reliable transportation. The EPD will request input and take notes at all meetings/workshops, with comments and responses recorded in the minutes. If in-person meetings are not possible due to COVID-19, alternatives will include 1) email, website updates, social media posts, and flyers/mailings for basic information and 2) quarterly phone conferences for two-way discussions and to solicit and respond to input. We will respond to comments in writing and/or during in-person meetings or phone calls. All community comments will be considered for adoption in site selection, assessment, cleanup planning, and redevelopment visioning. We will modify workplans as needed based on community input. A partner at the NCT Cultural Commission will assist with language accommodations and cultural considerations as needed. The EPD plans to staff a brownfields educational booth at the Northern Cheyenne powwow; in 2019 we gathered valuable community input at this annual event. We believe that the above communication plan is appropriate and effective for the Northern Cheyenne community, especially given specialized conditions such as multiple languages and lack of universal access to communication and transportation services.

3. Task Descriptions, Cost Estimates, and Measuring Progress

a. Description of Tasks/Activities and Outputs

Project tasks, schedules, and outputs for our proposed grant project are shown in the table below. The EPD will complete this work with the assistance of a Qualified Environmental Professional (QEP) and our proposed partners.

<table>
<thead>
<tr>
<th>Program Management</th>
<th>i. Project Implementation</th>
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<tbody>
<tr>
<td>→ Financial and administrative management of the grant; oversight of coop. agreement with EPA</td>
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<tr>
<td>→ Coordination with project partners and EPA; eligibility determinations; site access</td>
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<tr>
<td>→ Submission of quarterly reports and ACRES information</td>
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<tr>
<td>→ Procurement and management of a QEP; attend Tribal Lands and Environment Forum (TLEF)</td>
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ii. Anticipated Project Schedule: Coop. agreement completed with EPA as soon as possible following award; QEP procurement completed within 2 months of coop. agreement; grant management throughout the 3-year period; minimum quarterly meetings with EPA and project partners

iii. Task/Activity Lead(s): NCT-EPD (grantee)

iv. Output(s): 1 cooperative agreement, 1 RFP issued, 1 QEP contract completed, 12 Quarterly Reports, 12 ACRES updates, Brownfields Coordinator attendance at TLEF conference.

<table>
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<tr>
<th>Community Outreach</th>
<th>i. Project Implementation</th>
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<tbody>
<tr>
<td>→ Community Involvement Plan, community notices, fliers, phone meetings, announcements</td>
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<tr>
<td>→ Public or online meetings and planning workshops; fact sheet for each site assessed</td>
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→ Updates to the NCT-EPD’s existing Brownfields site inventory; updates to EPD web site
→ Incorporation of existing priorities & needs into reuse & redevelopment planning
→ Non-EPA grant resources: in-kind support from community partners.

ii. Anticipated Project Schedule: following procurement of a QEP; Community Involvement Plan completed within 3 months of completion of coop. agreement; at least three public meetings; minimum quarterly phone conferences and web updates; throughout the 3-year grant period.

iii. Task/Activity Lead(s): NCT-EPD with partner and QEP support (gathering input)

iv. Output(s): 1 Community Involvement Plan; three public meetings to gather community input; phone conferences; 1 updated site inventory; eight fact sheets

Site Assessment

i. Project Implementation

→ Site prioritization and selection will be guided by input from NCT-EPD staff, our project partners, the local communities, and the QEP; we will revise our existing QAPP
→ The preliminary list of key sites identified in this application was developed with community involvement. Final selection of priority sites will consider sensitive and disadvantaged populations.
→ Complete ASTM-compliant Phase I ESAs to identify Recognized Environmental Conditions (RECs) and other environmental concerns such as asbestos and lead-based paint.
→ Prepare Sampling and Analysis Plans (SAPs) and conduct ASTM-compliant Phase II ESAs to evaluate the extent and severity of contamination for those sites with environmental concerns.

ii. Anticipated Project Schedule: site prioritization, selection, eligibility, and access will be ongoing throughout the grant period (reviewed quarterly). Phase I and II ESAs will be completed within the first 2.5 years of the grant, which will leave time for cleanup planning.

iii. Task/Activity Lead(s): QEP with support from the NCT-EPD. The QEP will provide technical expertise and experience for all site assessment components above.

iv. Output(s): 1 updated site inventory; ten site access agreements & eligibility determinations; 8 Phase I ESA reports; 8 EPA-approved SAPs, and 8 Phase II ESA reports

Planning for Cleanup and Reuse/Redevelopment

i. Project Implementation

→ Cleanup planning: compare site data with cleanup standards; evaluation of costs and alternatives.
→ Reuse/Redevelopment Planning: incorporation of previously identified priorities and needs.
→ Non-EPA grant resources: in-kind support from community partners.

ii. Anticipated Project Schedule: to be completed during year 3 of the grant period.

iii. Task/Activity Lead(s): QEP with support from the NCT-EPD. The QEP will provide technical expertise and experience for all cleanup planning components above.

iv. Output(s): 3 conceptual cleanup plans, 1 Site Reuse Assessment (combined for the three petroleum sites @ Highway 212/Highway 39)

b. Cost Estimates


The tables below detail the project budget for the NCT grant project. We will use about 87% of the funds specifically for Phase I ESAs, Phase II ESAs, and cleanup/reuse planning.

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Project Tasks</th>
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<tbody>
<tr>
<td></td>
<td>Program Mgmt</td>
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<td>(Programmatic Costs Only)</td>
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</tr>
<tr>
<td>Personnel *</td>
<td>$ 9,672</td>
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<td>Fringe Benefits *</td>
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<td>Travel</td>
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<td>Contractual</td>
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<tr>
<td><strong>Total Budget</strong></td>
<td><strong>$15,824</strong></td>
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a = calculated at 30.0% of personnel cost; the NCT is not requesting indirect costs.

* = additional hours will be in-kind; no equipment or supplies will be purchased with grant funds.

**Program Mgmt/Personnel:** BF Coord@$31/hr; 0.15 FTE x 3 yrs = 312 hrs; $31/hr x 312 hrs = $9,672; on a quarterly basis: 5 hrs EPA reports & 6 hrs monthly progress meetings; 15 hrs site-specific work.

**Program Mgmt/Travel:** 2 trips to Tribal Lands & Environment Forum; per trip: airfare $900, 3 nights lodging@$450, per diem@$275 = $1,625/trip; 2 trips = $3,250

**Community Outreach/Personnel:** BF Coord@$31/hr; 0.10 FTE x 3 years = 210 hrs; $31/hr x 210 hrs = $6,510; on a quarterly basis: 9 hrs public meetings; 8.5 hrs redevelopment planning.

**Community Outreach/Travel:** fuel, vehicle, supplies for public meetings = $500

**Community Outreach/Contractual:** 3 public meetings; per meeting: vehicle@$400, per diem@$200, lodging@$300, labor for meetings & fact sheets @$3,000 per meeting; total = $11,700

**Site Assessment/Personnel:** BF Coord@$31/hr; 0.16 FTE x 3 years = 336 hrs; $31/hr x 336 hrs = $10,416; on a quarterly basis: 12 hrs for review of SAPs; 16 hrs for review of reports

**Site Assessment/Contractual:** QAPP revision@$2,750; 8 Ph I ESAs@$3,900 ea; 4 Ph II ESAs @$15,000; 4 Ph II ESAs @$63,000; Total = $2,750 + $31,200 + $60,000 + $252,000 = $345,950

**Cleanup & Reuse Planning/Personnel:** BF Coord@$31/hr; 0.1 FTE x 3 years = 204 hrs; $31/hr x 204 hrs = $6,324; on a quarterly basis: 8 hrs cleanup planning; 9 hrs review of plan documents

**Cleanup & Reuse Planning/Contractual:** 3 Cleanup Plans@$7,000 ea and 1 Site Reuse Assessment @$23,000 (for the 3 petroleum sites at Hwy 212/Hwy 39); Total = $21,000 + $23,000 = $44,000

c. **Measuring Environmental Results**

The EPD will routinely provide and evaluate project results, outputs, and outcomes via quarterly reports and ACRES. The brownfields coordinator will be responsible for measuring project progress and for tracking, measurement, and evaluation. Each quarter, we will compare completed project deliverables and outputs to our grant schedule and will include this information in quarterly reports. Our brownfields coordinator will discuss any obstacles and possible corrections with the EPA project officer. The EPD and EPA will develop a plan to resolve any problems to help ensure that the desired outputs and outcomes are achieved. A final report will compare all tracked data to our anticipated outcomes and project results. Anticipated outputs for this grant include a revised community outreach plan, a minimum of three public meetings, and eight fact sheets; eight Phase I reports, eight SAPs, eight Phase II reports, and three Conceptual Cleanup/Reuse Plans. Expected outcomes for this grant include three new business ventures, enhanced economic activity through site redevelopment, increased tourism revenue, and 10-12 new jobs; public input into site assessment and redevelopment options; and reductions in blight, environmental impacts, and human health & safety risks. Additional outcomes include minimized exposure to petroleum and hazardous substances; improved ecological health; up to 11 more affordable options for safe and healthy homes; more than 30 people moved off the housing waiting list; and at least seven fewer blighted parcels. The EPD will report these outputs and outcomes in ACRES and in quarterly reports. This information can inform comparisons between our work plan and our accomplishments. The NCT is confident that the assessment tasks will be completed within the three-year grant period.

4. **Programmatic Capability and Past Performance**

a. **Programmatic Capability**

   i. **Organizational Capacity**

   Founded in 1998, the NCT-EPD has more than 20 years of experience, capability, and administrative capacity to successfully manage a brownfields assessment grant. Our department has developed various environmental programs and manages an annual budget of almost $7 million. Grants include our Brownfields TRP, assessment,
and cleanup grants as well as other funds from the EPA; U.S. Dept. of Agriculture; U.S. Dept. of Energy; Bureau of Indian Affairs; U.S. Fish and Wildlife Service; and local utility company PPL Montana. In 2021, we are administering five EPA grants and three contracts/grants from other sources. We fulfill performance expectations, pass annual agency audits, and meet reporting requirements and deadlines for all funded programs. In addition to brownfields, we manage several core programs including water resources, non-point source pollution, air quality, and EPA’s General Assistance Program. Five of our staff members (see below) will provide experience and expertise to ensure the success of the grant project with respect to EPA’s programmatic, financial, and administrative requirements.

ii. Organizational Structure

The NCT, which is governed by a Tribal Council and Tribal President, handles the overall management of our personnel, tribal programs, and tribal lands. The EPD will implement the grant-funded brownfields program and will manage the program’s day-to-day operations. Within the EPD, a core group of key staff will commit time to the project. These include environmental administrators, brownfields specialists, and budget analysts. We believe that this efficient structure will ensure that the project will be completed successfully in a timely manner and that grant requirements will be fulfilled. Our personnel are adept at the technical, administrative, financial, and contracting aspects of managing grants of this size and scope. We have benefitted from knowledge gained during the management of our existing TRP, assessment, and cleanup grants. Our department structure is designed for clear communication, efficiency, and decision-making that directly affects each respective program. We are committed to building capacity, providing educational outreach, reducing human health risks for our people, and mitigating environmental degradation.

iii. Description of Key Staff

Charlene Alden, EPD Director and grants administrator, will provide direction and supervision to ensure the Brownfields Program objectives are fulfilled. Ms. Alden has been employed with the Department since 2009 in this capacity and has successfully overseen NCT’s TRP for 12 years. She will oversee Wayne Roundstone, the EPD Brownfields Coordinator. Mr. Roundstone will administer the technical work plan component of the grant. He is the manager of our existing TRP, our assessment grant, and our cleanup grant. He will serve as the day-to-day manager of assessment grant activities, including coordinating with EPA, completing site eligibility forms, reporting/documentation, and coordinating public meetings and events. Mr. Roundstone will also oversee the environmental contractor. He has worked at the EPD for four years and is well-qualified and motivated to continue expanding the EPD’s existing brownfields programs. Marty Ewing, EPD Office Manager, will fill the role of budget manager, as she does with the EPD’s existing TRP, assessment, and cleanup grants. During her four-year tenure with EPD, she has gained knowledge and expertise in the areas of federal grant administration and project management. Ms. Ewing will help ensure the timely expenditure of funds and the fulfillment of the grant’s financial requirements. Using assessment and cleanup grant funds, the EPD was also able to hire brownfields technicians Jade Sooktis and Joe “J.P.” Alden.

iv. Acquiring Additional Resources

The NCT’s formal procurement policy provides for the fair and equitable treatment of all persons in public purchasing; maximizes the purchasing value of public funds; and provides safeguards for maintaining and implementing a high-quality procurement process. Our system provides procedures for specifying a need for procurement, selecting the appropriate means and sources of acquiring services, evaluating proposals to meet our needs, selecting appropriate suppliers, and monitoring supplier performance. This system allows us to appropriately acquire expertise and resources by providing maximum free and open competition. We will select a contractor (QEP) in accordance with our procurement policy. This process has worked well for our EPD brownfields programs since 2015. Mr. Roundstone will assist the procurement officer with preparation and dissemination of an RFP, review of proposals, and selection of a QEP.

b. Past Performance and Accomplishments

i. Currently Has and Previously Received an EPA Brownfields Grant

1) Accomplishments

The EPD continues to build on our successful Brownfields program. Since the inception of our TRP in 2009, we have produced an inventory of more than 150 potential brownfields sites, nine Phase I ESAs, four Phase II
ESAs, and one site cleanup. In 2017, EPA awarded us a $300,000 assessment grant which resulted in the completion of two Phase I ESAs and eleven Phase II ESAs. We also oversaw the completion of four Phase I ESAs and two Phase II ESAs with the financial assistance of the Eastern Montana Brownfields Coalition. A $365,000 cleanup grant awarded in 2020 has allowed us to complete two site cleanups and we are actively planning for cleanups at four additional properties. Sustainable and equitable development outcomes associated with our completed brownfields efforts include enhanced economic activity through construction of the Northern Cheyenne Commerce Center, increased tourism revenue, four new businesses, and 10 new jobs. We also removed dilapidated structures from six sites, reduced environmental impacts, and mitigated human health and safety risks. At the conclusion of our ongoing cleanup grant, we will have provided more than 11 acres of land ready for reuse as well as seven new home sites. We submitted the above information to EPA in quarterly reports and via updated information in ACRES for all reservation brownfields sites, including 12 properties with recent assessment and/or cleanup activity.

2) Compliance with Grant Requirements

The EPD successfully manages existing grants and performs all phases of work under each grant. Programmatic and management components of grant administration for the TRP, the assessment grant, and the cleanup grant include timely preparation and submittal of quarterly reports; submittal of complete and accurate information within ACRES; provision of Phase I / II ESA reports to EPA; management oversight of subcontractors; and technical assistance to other NCT departments as needed. The EPD complies with brownfields grant workplans, schedules, and conditions, and we successfully manage grant funds. The EPD provides oversight during the successful completion of brownfields assessments and cleanups. We ensure that contractors perform activities in accordance with quality assurance plans and sampling plans, and we verify that all necessary activities are completed using appropriate methods.

The EPD began receiving TRP funding in 2009. We received $100,000 each year from 2009 through 2014, and approximately $105,000 from 2015 through 2021. We have expended all of our funds for each closed TRP grant from 2009 to 2020. Our current TRP grant began 10/1/21 and will continue through 9/30/22. Approximately $70,000 in grant funds remain. We plan to expend these TRP funds by paying salaries and fringe benefits, and by providing leveraged support of ongoing and future assessment/cleanup planning efforts described in this application. The period for our $300,000 assessment grant began 10/1/17. EPA extended the grant period to 12/31/21 due to difficulties associated with COVID-19. We expended more than half of our assessment grant funds on direct assessment activities (Phase I & II ESAs). As of 9/26/21, approximately $27,285 in funds remained in our assessment grant. We anticipate drawing down these funds by supporting ongoing site cleanup planning efforts. The period for our $365,000 cleanup grant began 10/1/20 and ends 9/30/23. Approximately $260,000 of the cleanup grant remains. We anticipate expending the totality of these funds on cleanups at four sites. In summary, we believe that the EPD has made and is making significant and timely progress toward achieving results for each grant.

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1 2017, 2018, and 2020 CEDS summaries for Lame Deer, Montana Prepared by Southeastern Montana Development Corporation
3 Greg Davis, EPA; Personal Communication, 9/27/19
4 NCT 2018 Community Health Assessment
5 U S Census, American Community Survey, 2018 estimates
6 The Lancet vol 374, 2009
7 U S Census information for Lame Deer CDP (2020)
8 NCT 2018 Community Health Assessment
9 NCT 2018 Community Health Assessment
10 NCT 2018 Community Health Assessment
11 NCT 2018 Community Health Assessment
12 2018 NCT Community Health Assessment
13 Montana Department of Public Health & Human Services (DPHHS), Cancer on the Northern Cheyenne Reservation, May 2016
14 Montana Department of Public Health & Human Services (DPHHS), Cancer on the Northern Cheyenne Reservation, May 2016
15 NCT 2018 Community Health Assessment
16 The Lancet, vol 374, 2009
17 Preterm Birth: Causes, Consequences, and Prevention Institute of Medicine Committee on Understanding Premature Birth, 2007
18 NCT 2018 Community Health Assessment
19 https://www.epa.gov/cjcreen
Threshold Criteria – Northern Cheyenne Tribe

1. **Applicant Eligibility**

   The Northern Cheyenne Tribe is an eligible entity to apply for an assessment grant because it is a federally-recognized Indian Tribe. Documentation of eligibility is not required because the applicant is a tribe.

2. **Community Involvement**

   Community involvement is and will be critical to the success of our brownfields program. We have held several public meetings beginning on our Reservation. The meetings informed the public of our previous assessment and cleanup grant applications, provided information related to ongoing site cleanups, and allowed interested citizens to comment on this proposal. As part of this grant award, NCT will prepare a Community Outreach Plan that will outline our community engagement efforts. The Community Outreach Plan will include sending newsletters and meeting invitations to members of our existing mailing list, maintaining and enhancing our existing brownfields website, conducting public meetings and one-on-one meetings with developers and future homeowners, and engaging local and regional media outlets. We will expand the participant list on an ongoing basis during the course of the project to maximize community engagement. We will also develop and/or update fact sheets for each site assessed.

   We will inform community members of meetings, activities, and events through announcements posted in agency offices and on our Facebook page. Announcements will be made at regular Reservation District meetings and at Tribal Council meetings. We also plan to have a brownfields presence again at our annual Northern Cheyenne Powwow. Proposed Brownfield-related events include community educational and planning meetings, one-on-one meetings with potential developers and property owners, field-based educational opportunities for Chief Dull Knife College students, and meetings designed to present the results of the assessments and next steps. We believe that these tasks will engage the public and all stakeholders to the maximum extent possible.

   We will make accommodations for community members with disabilities, the elderly, residents without telephones or Internet service, and those without reliable transportation to be able to attend meetings and events. We will identify a partner at the Tribal Cultural Commission to assist with language accommodations and cultural considerations for the benefit of target area residents.

   If in-person meetings are not possible due to COVID-19, alternatives will include 1) email, website updates, social media posts, and flyers/mailings for basic information and 2) quarterly phone conferences for two-way discussions and to solicit and respond to input.

3. **Named Contractors and Subrecipients**

   NCT has not selected any contractors or subrecipients to conduct any work proposed in this application. Once an EPA cooperative agreement is awarded, NCT will procure contractors in
accordance with procurement provisions of 2 CFR 200.317 through 200.327 as well as our tribal procurement requirements prior to beginning any assessment activities.

4. Expenditure of Existing Grant Funds

The Northern Cheyenne Tribe has an existing brownfields assessment grant (# 96856101). A report of general ledger entries provided by EPA (attached) indicates that approximately 91% of the total grant amount has been drawn down and disbursed ($272,715 of the $300,000 total) prior to October 1, 2021.