FORT BELKNAP INDIAN COMMUNITY
FY22 BROWNFIELDS CLEANUP GRANT APPLICATION
Narrative Information Sheet

1. Applicant Identification: Fort Belknap Indian Community
   656 Agency Main Street
   Harlem, MT 59526-9455

2. Funding Requested
   a. Grant Type: Multiple Site Cleanup
   b. Federal Funds Requested
      i. Requested Amount: $500,000
      ii. We are requesting a cost-share waiver.
      iii. We are not requesting a waiver of the $500,000 limit

3. Location: a) Fort Belknap Agency and Lodgepole; b) Blaine County; c) Fort Belknap Indian Reservation, Montana. Priority sites listed in the proposal are tribally owned lands.

4. Property Information: Former Lodgepole School
   275 Hoka Hey
   Lodge Pole, MT 59527

   Former Water Treatment Plant
   103 Agency Main Street
   Harlem, MT 59526

   Old Agency Dump
   Fort Belknap Indian Reservation
   48.475132° North and 108.781335° West (Rural Property)
   Harlem, MT 59526

   Sacred Heart Catholic Church
   5015 U.S. Highway 2
   Harlem, MT 59526
5. **Contacts**
   a. **Project Director**
      - Name: Ina L. Nez Perce
      - Title: Environmental Manager
      - Address: 656 Agency Main Street
                Harlem, MT 59526
      - Phone: (406) 353-8429
      - Email: inperce@ftbelknap.org
   
   b. **Chief Executive/Highest Ranking Elected Official**
      - Name: Jeffrey Stiffarm
      - Title: Tribal Council President
      - Address: 656 Agency Main Street
                Harlem, MT 59526
      - Phone: (406) 353-2205
      - Email: jeffrey.stiffarm@ftbelknap.org

6. **Population**
   Fort Belknap Indian Reservation: 3,429 Enrolled tribal members
## 7. Other Factors Checklist

<table>
<thead>
<tr>
<th>Other Factor</th>
<th>Page #</th>
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</thead>
<tbody>
<tr>
<td>X Community Population is 10,000 or less.</td>
<td>Narrative Info Sheet</td>
</tr>
<tr>
<td>X Applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>Narrative Info Sheet</td>
</tr>
<tr>
<td>The priority brownfield site(s) is impacted by mine-scarred land.</td>
<td></td>
</tr>
<tr>
<td>X Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.</td>
<td>Sacred Heart Church – Page 3</td>
</tr>
<tr>
<td>The proposed site(s) is adjacent to a body of water (i.e. the border of the proposed 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>
<td></td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td></td>
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<tr>
<td>X The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>Old Agency Dump – Pages 3&amp;4</td>
</tr>
<tr>
<td>X The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>School, Dump – Pages 2-4</td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recent closed (2011 or later) or is closing.</td>
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</tbody>
</table>

8. **Letter from the State or Tribal Environmental Authority**
   According to EPA Guidance, a letter from the Fort Belknap Environmental Office is not required since the Fort Belknap Indian Community is the applicant.

9. **Releasing Copies of Applications**
   N/A – The application does not have confidential, privileged, or sensitive information.
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area

i. The Fort Belknap Indian Community (FBIC) is applying for a $500,000 cleanup grant for four important sites on the Fort Belknap Indian Reservation. Established in 1888, the Fort Belknap Indian Reservation (Reservation) is home to the Gros Ventre (Aaniiih) and Assiniboine (Nakoda) Tribes. FBIC has approximately 6,700 enrolled members, of which about 3,400 live on the Reservation.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 people2 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. Life on our reservation is difficult due to persistent poverty and our isolated and remote location. As a result, our people suffer from high rates of suicide, drug abuse, and disease. Our tribal government and residents do not have the funds to maintain, renovate, or cleanup contaminated properties on our reservation. As a result, numerous buildings are vacant, uninhabitable, and contaminated with asbestos and lead-based paint, and former dumping grounds litter our lands. Despite our many challenges, we are hopeful and committed to a better future which will be realized in part through the redevelopment of blighted properties. With this cleanup grant, we will create a youth center, a disaster and emergency response office, a preserved historic church, and a solar energy field which will reduce energy costs for our members. Brownfields cleanup funding is essential to improve quality of life for the Gros Ventre and Assiniboine people.

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

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 until 2004, when a new school was constructed. Since 2004, the 16,225 square foot building has remained vacant and used for storage. The school is one of the only usable buildings in Lodge Pole that has access to good drinking water. It also has a gymnasium, commercial kitchen, multiple classrooms, and common areas. 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, and two mercury-containing thermostats.

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 3,750 square foot building has remained vacant. The building is centrally located in town and has additional acreage should

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1http://www.montana.edu/extensionecon/countidata/FortBelknap.pdf
2https://data.census.gov/cedsci/all?q=Fort%20Belknap%20Agency
expansion and/or equipment storage be needed. Asbestos was identified in the drywall joint compound on the interior of the building, as well as PCB-containing light ballasts. Four large concrete vault tanks used to hold chemicals for water treatment are located onsite with unknown contents. Drums containing chemicals are inside and near the building. Three drums contain diallyl dimethylammonium chloride, one contains a corrosive coagulant, and a final drum has unknown contents and is labeled “mix-up”.

Sacred Heart Catholic Church – Also known as the Pink Church, the two-story, 3,322 square foot building is located on the main highway through Fort Belknap Agency and the Reservation. Unlike some tribes, the Catholic presence on our reservation has been a positive one that has valued our native culture, language, and history. 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 received a variety of wastes dumped by residents, tribal entities, Indian Health Services (IHS), and the Bureau of Indian Affairs (BIA). After its closure in the 1980s, the site became an unofficial dump for debris such as concrete, pipes, and cars. Phase II ESAs confirmed the presence of Pentachlorophenol (PCP) and di(2-ethylhexyl)phthalate (DEHP) in surface soils at concentrations above generic regional screening levels (RSLs). The site poses a health and safety risk to children and families living in the adjacent Eagle Valley Estates subdivision, which is slated to begin construction in 2022.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

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 Comprehensive Economic Development Strategy (CEDS). At Hays Lodge Pole School District, the graduation rate is 60%, which is ranked in the bottom 50% of all 351 school districts in Montana. Families struggle with access to preschools or daycare, which makes it difficult to maintain employment. To combat these obstacles, we plan to clean up 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.

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 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 outbreaks.

Sacred Heart Church – Tourism to historic places was identified in our 2020 CEDS as an opportunity for economic growth on the reservation. The Sacred Heart Catholic Church is an unusual building that stands by itself on the edge of our community as a testament to the Catholic church’s influence on the Reservation, but visitors can only guess at its history and significance. The building is boarded up and blighted. After cleanup,

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we plan to restore the historic church and create an indoor viewing area where tourists and the faith community can be transported back to the 1930’s.

Old Agency Dump – One of the greatest challenges on our reservation is lack of housing. There are more than 230 people on our Tribal Housing waiting list, which is 7% of our enrolled tribal population. 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 energy for homeowners in Eagle Valley Estates.

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

Former Lodge Pole Elementary School – 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, and an estimated 100 children ages 5 and under could be enrolled in the center’s early childhood development programs. Research shows that providing a high-quality education for children before they turn five yields significant benefits, such as better academic performance, higher likelihood of graduating high school, and higher earnings in the workforce. National research on after school programs show that for every dollar invested, these programs return $9.60 back to the community in the form of parent’s earnings and cost savings for their communities.

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 crisis situations such as extreme COVID outbreaks or power outages during cold winter conditions. Increased preparedness and the ability to respond to an emergency 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 and responding quickly when they occur, our tribes will be able to reduce the damage and cost of rebuilding.

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 as a pink monument by itself on a hill as you enter the town of Fort Belknap Agency. Of the 3.3 million visitors to Glacier Park each year, many of them drive through our community. Reopening of the church as a museum and worship center would encourage passing visitors to stop, learn about our tribes, the relationship of the Catholic Church to Indian communities, and purchase food and gas on our reservation.

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

1.c.i. Resources Needed for Site Reuse

As a federally recognized tribe, FBIC is an eligible applicant for a number of redevelopment grants. The local O’Bryan-Gilbert Ranch has pledged $10,000 in restoration funding for the Sacred Heart Church project and has identified an additional $15,000 of funding through the State of Montana Historic Preservation Grant.
Fort Belknap Indian Community  
FY22 EPA Brownfields Cleanup Grant  
Ranking Criteria  

Program. We will work 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 church. FBIC Director of Planning, Ms. Delina Cuts The Rope, will help identify and 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 the youth center, we will consider 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.

1.c.ii. Use of Existing Infrastructure  
Each of our priority sites represents an opportunity to utilize existing buildings, infrastructure and city services. Reuse of existing buildings help us avoid the expense of new construction. Except for 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 our 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  

2.a. Community Need  

2.a.i. The Community’s Need for Funding  
Due to the unique relationship Reservation residents have with the United States government and its treaty obligations, FBIC does not tax its members. There are approximately 3,400 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 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, compared to 21% for the state of Montana. The per capita income is $12,488 per year while the Montana per capita income is $31,151 per year. 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.

2.a.ii. Threats to Sensitive Populations  
1) Health or Welfare of Sensitive Populations - 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. Drug

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7 Ejscreen.epa.gov  
8 www.census.gov  
9 http://metheffect.com/ReservationTreatment-Solutions.html
use is seen in children as young as third grade, because they are exposed to drugs at home through family members.\textsuperscript{10} Our brownfields program seeks to revitalize blighted buildings to provide space for safe youth activities (Lodge Pole School, Sacred Heart Church) and to remove abandoned dangerous places (former Water Treatment Plant) where disaffected youth go to use drugs.

We are combating a suicide epidemic. The Montana American Indian suicide rate is about 28.5 deaths per 100,000 people, more than twice the rate of the overall U.S. population\textsuperscript{11}. Additionally, Native American youth in Montana die from suicide at a rate five times higher than other groups between ages 11 to 24 statewide\textsuperscript{12}. In 2019, Fort Belknap declared another State of Emergency, this time to request help addressing our high rates of youth suicide.\textsuperscript{13} Creating a Youth Center at the former Lodge Pole School will provide kids with a safe place for recreation and for programs aimed at preventing drug abuse and suicide. Youth that participate in after-school programs with a suicide prevention curriculum are 65% less likely to consider suicide, and 67% less likely to attempt suicide than before the program.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions - 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 2009-2018) in our community is 479, higher than the white resident rate of 429.\textsuperscript{14} Exposure to asbestos and subsurface carcinogens may contribute to this rate. The primary contaminant of concern on three of our four sites is asbestos, which causes lung cancer. By cleaning up the Lodge Pole School, Water Treatment Plant, and Sacred Heart Church, we will provide safe, asbestos-free community spaces. Pentachlorophenol (PCP) and di(2-ethylhexyl) phthalate (DEHP) are the two contaminants of concern at the Old Agency Dump site. PCP is a probable carcinogen. Chronic exposure to PCP includes respiratory inflammation, anemia, and kidney and liver effects. DEHP has been linked to a range of adverse effects in the liver, reproductive tract, kidneys, lungs, and heart. Cleanup of these sites will reduce exposure to potentially cancer-causing contaminants for our vulnerable population.

(3) Promoting Environmental Justice - FBIC has been deeply affected by mining impacts to our water. The former Zortman-Landusky gold mine is adjacent to the Fort Belknap Reservation and the communities of Lodge Pole and Hays. 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 including asthma, thyroid problems, and diabetes have been on the rise on our reservation, especially among children. Other health impacts possibly associated with the former gold mining have also been reported, such as lead poisoning and chemical burns from swimming in the water that flows out of the mining area. Redevelopment of the former Lodge Pole School would improve the quality of life for Lodge Pole and Hays residents suffering from environmental injustice.

2.b. Community Engagement

\textsuperscript{10} https://www.npr.org/sections/health-shots/2017/05/27/529112467/two-sisters-try-to-tackle-drug-use-at-a-montana-indian-reservation
\textsuperscript{11} https://dphhs.mt.gov/Portals/85/suicideprevention/SuicideinMontana.pdf
\textsuperscript{12} http://nativenews.jour.umd.edu/2017/reaching-out-flathead/
2.b.i. Project Involvement and 2.b.ii. Project Roles
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.

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact</th>
<th>Role in Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Island Mountain Development Group</td>
<td>Sean Henderson, (406) 673-3031 <a href="mailto:sean.henderson@islandmtn.com">sean.henderson@islandmtn.com</a></td>
<td>Evaluate inclusion of solar power from solar plant at Old Agency Dump into energy configurations for homes.</td>
</tr>
<tr>
<td>Tribal Historic Preservation Office</td>
<td>Michael Black Wolf, (406) 353-2295 <a href="mailto:mbblackwolf@ftbelknap.org">mbblackwolf@ftbelknap.org</a></td>
<td>Conduct historical evaluation Sacred Heart Church. Evaluate historic preservation grant funding.</td>
</tr>
<tr>
<td>O'Bryan-Gilbert Ranch</td>
<td>Kyle Stiffarm, (406) 262-0448 <a href="mailto:obryanranch@outlook.com">obryanranch@outlook.com</a></td>
<td>Providing $10,000 in redevelopment funding; apply for grant funds through Montana Historic Preservation Grant Program</td>
</tr>
<tr>
<td>Opportunity Link</td>
<td>Barbara Stiffarm, (406) 265-3699 <a href="mailto:bstiffarm@opportunitylinkmt.org">bstiffarm@opportunitylinkmt.org</a></td>
<td>Identify funding sources for programs to be offered at Lodge Pole School. Facilitate community outreach meetings.</td>
</tr>
<tr>
<td>Tribal Planning Department</td>
<td>Delina Cuts The Rope, (406) 353-8435 <a href="mailto:Delina.cutstherope@ftbelknap.org">Delina.cutstherope@ftbelknap.org</a></td>
<td>Secure funding for site redevelopment; Incorporate brownfields discussions into public meetings hosted by the Planning Department.</td>
</tr>
<tr>
<td>Hays Lodge Pole School District</td>
<td>Reyna Monteau, 406-673-3120, <a href="mailto:rperez@hlpschools.k12.mt">rperez@hlpschools.k12.mt</a></td>
<td>Input and coordination on curriculum and programming for Youth Center at Lodge Pole School</td>
</tr>
<tr>
<td>Fort Belknap Disaster and Emergency Services</td>
<td>Byard Lamebull, 406-353-4874, <a href="mailto:blamebull@ftbelknap.org">blamebull@ftbelknap.org</a></td>
<td>Outreach and input on design of Disaster Response Center at the former Water Treatment Plant</td>
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2.b.iii. Incorporating Community Input
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 on the FBIC Facebook page and on the radio. Meetings will be held at the community center in Fort Belknap Agency, the Enemy Killer Gym in Lodge Pole, and will 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, use of ADA accessible facilities, and translation into the native White Clay language upon request. Given the current COVID-19 pandemic, we will hold our meetings at a location large enough to accommodate social distancing and provide a Zoom link for online participation. Notes will be taken at all meetings, with comments recorded in the minutes. All comments will be reviewed and considered, and the Fort Belknap Environmental Office will provide response directly to the person who provided the comment or question. We will create four fact sheets to describe the abatement processes (one for each site). We will also schedule two Brownfields Program interviews on 88.1 The Buckskin Voice, the local radio station.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS
3.a. Proposed Cleanup Plan
Former Lodge Pole School – The eleven asbestos-containing materials (ACM) inside the school would be abated with the building intact. Roofing materials are non-friable, would not be touched, and would not be abated. The lead-based paint (LBP) in the school will be managed in-place with an encapsulating paint. 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 – ACM in the Plant would be abated with the buildings intact. The drywall in the offices and storage room is regulated friable asbestos and will need to be abated. All existing drums will be removed prior to renovation. The tanks and piping inside the Plant will be emptied and removed. PCB light ballasts in all three buildings would be removed and disposed of.
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.

For all three building materials abatement projects listed above, FBIC will contract with an accredited asbestos abatement firm providing the lowest responsible, responsive bid aligned with our Tribal Employment Rights Ordinance. FBIC will engage a third-party accredited asbestos clearance firm to visually inspect for complete abatement and to perform post-abatement clearance sampling.

Old Agency Dump – Surface soils in three distinct 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 a Class II landfill. 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

1. Cooperative Agreement Oversight – We will issue a Request for Proposals (RFP) for a Qualified Environmental Professional (QEP) within two months 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 the ACRES database and submit quarterly reports; facilitate site access; attend the national Brownfields conference and the Tribal Lands and Environment Forum (TLEF); 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 reports; 12 ACRES updates; 2 Conferences.

2. Marketing & Community Outreach – FBIC and the QEP will develop a Community Relations Plan (CRP); prepare 4 fact sheets; hold 4 public meetings; engage local newspaper and radio stations; 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. Outputs: 4 fact sheets; 4 public meetings; 8 Facebook updates.

3. Cleanup Planning and Oversight – Before initiating any work, the QEP will draft a Programmatic Quality Assurance Project Plan (QAPP). For each of the four projects, the QEP will finalize the draft ABCA; write a Sampling and Analysis Plan (SAP) for post-cleanup clearance; create bid specifications; and organize a bid walk. The QEP will conduct clearance sampling to ensure no asbestos remains in the air or on building surfaces and contamination in soil has been fully excavated. The QEP will prepare Cleanup Completion Reports (one per site). Anticipated Schedule: December 2022 – September 2025. Task Lead: QEP (due to experience/expertise). Outputs: 1 QAPP; 4 final ABCAs; 4 Clearance SAPs; 4 bid specifications; 4 Cleanup Completion Reports.

4. Cleanup – Supervised by the QEP, a licensed asbestos abatement contractor will remove ACM, encapsulate LBP, and remove mercury thermostat switches at the school, plant, and church sites. A waste handling contractor will remove the tanks and drums at the plant. An excavation contractor with HAZWOPER training will remove contaminated soils at the Old Agency Dump site. Anticipated Schedule: April 2023 – June 2025. Task Lead: Abatement contractors with QEP supervision (due to expertise). Outputs: 13 ACMs abated; 978 cubic yards 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
3.c.i. – 3.c.iii. Development, Application, and Eligibility of Cost Estimates and Cost Share

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.

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Cooperative Agreement Oversight</th>
<th>Marketing &amp; Community Outreach</th>
<th>Cleanup Planning &amp; Oversight</th>
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<td>$5,500</td>
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<td>Equipment</td>
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<td>Supplies</td>
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<td>Contractual</td>
<td>$9,000</td>
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<td>$70,600</td>
<td>$374,268</td>
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<tr>
<td>Total Costs</td>
<td>$18,212</td>
<td>$10,712</td>
<td>$96,808</td>
<td>$374,268</td>
<td>$500,000</td>
</tr>
</tbody>
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| Total Federal Funding              | $18,212                         | $10,712                       | $96,808                     | $374,268| $500,000 |
| Cost Share                         | $3,642                          | $2,142                        | $19,362                     | $74,854 | $100,000 |
| Cost Share Waiver                  | $(3,642)                        | $(2,142)                      | $(19,362)                   | $(74,854)| $(100,000)|
| Total Budget                       | $18,212                         | $10,712                       | $96,808                     | $374,268| $500,000 |

1Travel to brownfields-related training conferences is an acceptable use of these grant funds.
2The applicant will comply with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326

Cooperative Agreement Oversight – Personnel costs: $30/hour for 3 hours per month for 36 months = $3,240; Fringe Benefits: 30% of Personnel Costs = $972; Travel: $2,000 for 1 employee to attend 1 National Brownfields Conference, plus 2 employees ($1,500 each) at 1 Tribal Lands and Environment Forum for a total of $5,000; Contractual: $125/hour for an average of 2 hours per month for 36 months for QEP to assist with reporting and EPA/grantee meetings; Cost Share: Waiver Requested.

Marketing/Community Outreach – Personnel costs: $30/hour for 3 hours a month for 36 months = $3,240; Fringe Benefits: 30% of Personnel Costs = $972; Travel = $500 for in-region travel to public meetings; Contractual: 4 fact sheets at $500/fact sheet = $2,000 plus 4 public meetings (includes meeting prep, travel, meeting) at $1,000 per public meeting = $4,000, $6,000 total; Cost Share: Waiver Requested.

Cleanup Planning and Oversight – Personnel costs: $30/hour for 4 hours/week for 3 years = $18,720 plus 48 hours to review plans/reports = $1,440, Total = $20,160, Fringe Benefits: 30% of Personnel Costs = $6,048; Contractual: Project Manager at $125/hour for 80 hours per project for 4 projects (total $40,000), field scientist at $90/hour for 480 hours (total $21,600), and a Senior Asbestos Inspector at $150/hour for 60 hours (total $9,000) for a total of $70,600. Approximately half of the contractual cleanup oversight budget ($35,500) will be allocated to the Lodge Pole School project, as this project will require multiple clearances as part of the abatement oversight. The remainder of the budget ($35,100) will be allocated between the church ($10,000), Water Treatment Plant ($15,000) and Old Agency Dump ($10,100) projects. Cost Share: Waiver Requested.

Cleanup – Contractual: Cleanup costs were estimated based on quantities of contaminants documented in the Phase II ESAs (includes contingency and TERO fees). Lodgepole School: $128,734; Water Treatment Plant:
3. Measuring Environmental Results
Each quarter, completed project deliverables and outputs will be compared to our quarterly schedule for the grant and be reported in ACRES. 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, during the project and 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; and $3.5 million leveraged in redevelopment funding.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE
4.a. Programmatic Capability
4.a.i & a.ii. Organizational structure and Description of Key Staff
Our FBIC Environmental Protection Department (EPD) has the experience, 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. In 2002, our Environmental Manager was awarded the EPA Region VIII A. Wade Vitalis Award “For outstanding work to protect the environment...” 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...” 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.

Experienced staff will manage this cleanup grant. Ms. Ina Nez Perce, EPD Manager, has led the DEP since 1992 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. Ms. Nez Perce will direct and assist DEP staff in public involvement, education initiatives, and outreach. Mr. Kermit “Dale” Snow, Jr. has worked for the Environmental Department in various positions since 2001 and currently serves as the Environmental Compliance Officer for the FBIC Brownfields program. 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. 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. Charlotte Lamebull, Chief Finance Officer 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, as well as accurate financial reporting of grant expenses.

4.a.iii. Acquiring Additional Resources
Environmental expertise will be contracted to support certain public involvement functions, conduct cleanup planning, cleanup oversight, cleanup, and cleanup reporting. All contracts under this grant will be 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
4.b.i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments - We have successfully managed federal, state, and local grants, including over $9 million in EPA grants. These include our Brownfields Tribal Response Program, which began in 2009. From 2014 - 2017, we administered $933,900 in 128(a) Tribal Response Funds and assessed and/or cleaned up six sites. As part of this grant, we completed cleanup of the historic Former People’s Creek Cattle Dip Vat site, which was contaminated with arsenic in soil. Approximately 750 ft³ of impacted soil was excavated, the area was backfilled, and a No Further Action letter was issued in 2015. An interpretive sign was installed to communicate and preserve the historic significance of the site. This project created three cleanup jobs. We also developed a Hazardous Materials Inventory of 18 sites within our reservation boundary. We completed Phase I, Phase II, and cleanup of petroleum, asbestos, and lead at the historic Lodgepole Community Hall, a 4-acre site that is currently being restored and is listed on the National Historic Register. This project created two cleanup jobs. From 2017 - 2020, we received $700,700 in 128(a) funds. Using these funds, we completed numerous Transfer Site inspections; held community meetings; provided Earth Day education outreach to area schools; investigated an herbicide spill; and investigated illegal dumping and former dump areas. We were awarded an additional $130,114 in 128(a) funds in 2021. To date, we have completed transfer site inspections for each of our communities; decommissioned four underground storage tanks at a former gas station in Hays; and reviewed compliance information for the Kwik Stop gas station in Fort Belknap Agency. In 2019, we leveraged an additional $50,000 in Montana Department of Natural Resources and Conservation (DNRC) grant funding to complete additional assessment at the Old Agency Dump site. Through the use of these additional funds, we completed supplemental assessment and delineated the extent of the release at the dump.

(2) Compliance with Grant Requirements – FBIC is currently in compliance with all EPA Brownfields grant agreements, reporting requirements, and is in good standing with EPA Region 8. Each quarter, our staff refers to the grant workplan and timeline to assure that goals for that quarter are achieved. If a workplan item scheduled for that quarter was not achieved, we develop a plan with our EPA Project Officer to complete that item in a subsequent quarter. In addition to our quarterly reporting, we have successfully tracked grant expenditures by budget category, provided workshop/conference trip reports, and submitted annual financial and MBE/DBE reports as required by EPA. We obtained an extension of our 2014 funding so we could complete assessment and cleanup tasks. We achieved our goals and objectives and closed this grant out with zero funds remaining. Thereafter, we had vacant positions intended for brownfields funding, and we returned funds to EPA from our 2017 grant funds, while still accomplishing grant tasks. Rather than spend these funds on something unnecessary, we chose to return this funding to EPA. Since that time, we have filled our staff positions, and our current grant funds are on track to be spent by September 2022. In accordance with our Montana DNRC grant requirements, we have submitted quarterly reports to DNRC, provided project updates, and included EPA as the environmental oversight agency for the project. Using these funds, we were able to develop an ABCA for the Old Agency Dump site as part of the Supplemental Assessment reporting. We are on track to expend our grant funds and closeout our DNRC grant by the end of 2022. Securing cleanup funds for the Former Lodge Pole School, Water Treatment Plant, Sacred Heart Church, and Old Agency Dump will allow us to fulfill the cleanup and redevelopment goals established for these sites during our previous 128(a) and DNRC grants.
ATTACHMENT A: THRESHOLD CRITERIA RESPONSE

1. Applicant Eligibility: Fort Belknap Indian Community is composed of two federally recognized Native American tribes, the A’aninin (Gros Ventre) and the Nakoda (Assiniboine).

2. Previously Awarded Cleanup Grants: The sites proposed for cleanup have not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds: Fort Belknap Indian Community does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership: The sites proposed for cleanup are currently located on the Fort Belknap Indian Reservation, which is owned by the Fort Belknap Indian Community. Fort Belknap Indian Community will retain ownership of all sites throughout the period of the grant.

5. Basic Site Information:

Site #1
a) Site Name: Former Lodgepole Elementary School
b) Address: 275 Hoka Hey, Lodge Pole, MT 59927
c) Current Owner: Fort Belknap Indian Community

Site #2
a) Site Name: Former Water Treatment Plant
b) Address: 103 Agency Main Street, Harlem, MT 59526
c) Current Owner: Fort Belknap Indian Community

Site #3
a) Site Name: Old Agency Dump
b) Address: Fort Belknap Indian Reservation (48.475132° North and 108.781335° West), Harlem, MT 59526
c) Current Owner: Fort Belknap Indian Community

Site #4
a) Site Name: Sacred Heart Catholic Church
b) Address: 5015 U.S. Highway 2, Harlem, MT 59526
c) Current Owner: Fort Belknap Indian Community

6. Status and History of Contamination at the Sites:
- Former Lodgepole Elementary School – The site is contaminated with hazardous substances. The school was built in 1957 and was closed in 2004 when a new school building was constructed. The school district has used the building for storage since 2004. The former school building contains 11 asbestos-containing building materials and 14 interior and exterior locations of lead-based paint. PCB-containing light ballasts are present in multiple rooms in the school. Two mercury-containing thermostats have been observed.
The property became contaminated with asbestos, lead-based paint, PCBs, and mercury when it was constructed in 1957.

- **Former Water Treatment Plant** – The site is contaminated with hazardous substances. The property became contaminated when it was constructed in 1973 and through the use of hazardous chemicals for water treatment during its operations from 1973 to 2010. The treatment plant was originally commissioned in 1973 to provide domestic drinking water to Fort Belknap Agency. The treatment plant was abandoned in 2010 when a new water treatment facility was constructed. The building has remained unused and unoccupied since 2010. Asbestos-containing drywall joint compound is present throughout the building. Several light ballasts contain PCBs. Chemical drums present inside and outside the building are full of diallyl dimethylammonium chloride, corrosive coagulant, and 1 drum with unknown contents that must be disposed of as hazardous substances. Four tanks containing hazardous substances used in the water treatment process are also present onsite.

- **Old Agency Dump** – The site is contaminated with hazardous substances. The Old Agency Dump reportedly operated on the site from the 1970s to the mid-1980s and was used by residents, tribal entities, the Indian Health Services (IHS), and the Bureau of Indian Affairs (BIA). During its operation, the dump 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. Pentachlorophenol (PCP) and di(2-ethylhexyl) phthalate (DEHP) are present in soils in the western and southwestern areas of the site.

- **Sacred Heart Catholic Church** – The site is contaminated with hazardous substances. The two-story building was constructed in 1931 to serve as a Native American Mission Church and was closed in the mid-1960s. The building is currently vacant. The property became contaminated with asbestos in the boiler jacket and lead-based paint on the window frames and doors during construction and upkeep of the building.

### 7. Brownfields Site Definition
The sites listed above meet the definition of a brownfield site and are a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issue to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government, except land that is held in trust by the U.S. government for an Indian tribe (Fort Belknap Indian Community).

### 8. Environmental Assessment Required for Cleanup Grant Applications
The following assessments have been completed on the sites listed above. The Phase II ESAs were conducted in accordance with ASTM Standard Practice E1903-19.

- Former Lodgepole School – Phase II ESA; March 2020
- Former Water Treatment Plant – Phase II ESA; March 2020
- Old Agency Dump - Two Phase II ESAs; March 2004 and November 2021
- Sacred Heart Catholic Church – Phase II ESA; March 2020

### 9. Enforcement or Other Actions
Fort Belknap Indian Community affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.
10. Sites Requiring a Property-Specific Determination
Based on the information provided in the Request for Applications guidance and the document entitled “Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k),” the sites do not require property-specific determinations.

11. Threshold Criteria Related to CERCLA/Petroleum Liability
   a) Property Ownership Eligibility – Hazardous Substance Sites
      The Fort Belknap Indian Community, as a federally-recognized Indian tribe, is exempt from CERCLA liability.
   b) Property Ownership Eligibility – Petroleum Sites
      Not applicable

12. Cleanup Authority and Oversight Structure
   a. Cleanup Oversight
      The sites listed above will be enrolled in Fort Belknap’s Tribal Response Program. Fort Belknap Indian Community’s Environmental Office Director will oversee the cleanups of the above sites with the assistance of a Qualified Environmental Professional (QEP). We have experience with similar cleanup projects on our Reservation. Fort Belknap Indian Community will consult with EPA to ensure that all cleanup plans are appropriate and the cleanup activities will be protective of human health and the environment.

      Fort Belknap Indian Community intends to hire both a QEP to manage and oversee the cleanup, and an abatement contractor to conduct abatement and removal of the hazardous materials. Consistent with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326, Fort Belknap Indian Community will perform the following actions to ensure this technical expertise is in place prior to beginning cleanup activities:

      i) Issue a Request for Proposal to select a QEP.
      ii) Issue a Request for Bids to select an abatement contractor.
      iii) Solicitations shall clearly set forth all requirements that the proposer/bidder shall fulfill in order to be evaluated by Fort Belknap Indian Community.
      iv) Awards shall be made to the bidder/proposer who is responsive to the solicitation and whose offer is most advantageous to Fort Belknap Indian Community based on price, quality, and other factors.
      v) Contracts shall be made only with responsible firms who possess the potential ability to perform successfully under the terms and conditions of the proposed procurement.
      vi) Cost or price analysis shall be made and documented in the procurement files in connection with every procurement action.
      vii) Procurement records and files for purchases in excess of the small purchase threshold shall include the following at a minimum: Basis for contractor selection; justification for lack of competition when competitive bids or offers are not obtained; and basis for award cost or price.
b. Neighboring Properties
Access to neighboring properties will not create problems for this project because the sites proposed for cleanup are parts of larger tracts that are all owned by the Fort Belknap Indian Community.

13. Community Notification
Fort Belknap Indian Community (FBIC) provided the communities of Fort Belknap Agency and Lodge Pole with a notice of its intent to apply for an EPA Brownfields Cleanup Grant on November 1st and 3rd, 2021. A public notice was for each of the two meetings was posted on the FBIC Facebook page and website (www.ftbelknap.org). A copy of the draft proposal and the draft Analysis of Brownfield Cleanup Alternatives (ABCAs) for each of the four sites were made available to the public through the FBIC website. FBIC held two public meetings on November 4, 2021, one in Fort Belknap Agency and a second in Lodge Pole, to discuss the draft proposal and consider public comments. Copies of the draft grant proposal and ABCA were available at the public meeting. Public comments were accepted through November 18, 2021. Copies of the following documents are provided in Attachment D:

1. Copy of the draft ABCAs;
2. Copy of the Facebook advertisement that demonstrates solicitation for comments on the application and when and where the public meeting will occur;
3. Summary of the comments received;
4. Fort Belknap Indian Community’s response to the public comments;
5. Meeting notes or summary from the public meeting; and,

14. Statutory Cost Share
Fort Belknap Indian Community is a federally-recognized Indian tribe with a population of 3,429. Due to extreme poverty and lack of funding on our Reservation, we will not be able to meet the 20% cost share. Meeting the 20% cost share requirement would place undue hardship on our tribal government and our community members. We are requesting a hardship waiver of the entire cost share. Please see the attached Hardship Waiver Request (Attachment C).

15. Waiver of the $500,000 Limit
Fort Belknap Indian Community will clean up multiple sites and is not requesting a waiver of the $500,000 limit.

16. Named Contractors and Subrecipients
Fort Belknap Indian Community has not identified any contractors or subrecipients to be named in this application. Fort Belknap Indian Community intends to hire a Qualified Environmental Professional (QEP) to manage and oversee the cleanup and an abatement contractor to conduct abatement and removal of the hazardous materials after an EPA cooperative agreement is awarded. Our procurement will be consistent with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326.