



**Bear Paw Development Corporation
FY24 Brownfields Assessment Grant Application
Narrative Information Sheet**

1. Applicant Identification Bear Paw Development Corporation
300 Second Ave
PO Box 170
Havre, MT 59501
2. Funding Requested
 - a. Assessment Grant Type - Community-wide
 - b. Federal Funds Requested - \$500,000
3. Location
Bear Paw Development's Brownfield Program serves Liberty, Hill, Blaine, Phillips, and Chouteau Counties, as well as the Rocky Boy's Reservation in North Central Montana.
4. Target Area and Priority Site Information
Our target areas include the Downtown Havre census tract (30041040300) and the Box Elder census tract (30041940300). Site addresses for the priority sites proposed in our Narrative include:

Site Name	Address	City, State, Zip
Bullhook Clinic Homes	316 3 rd St, 527 3 rd St, 300 6 th Ave, 316 6 th Ave, 320 6 th Ave	Havre, MT 59501
Havre Police/Fire Station	520 4 th Street	Havre, MT 59501
Havre Senior Center	2 2 nd Street West	Havre, MT 59501
Former Box Elder Landfill	48°19'05.11" N, 110°02'53.06" W	Box Elder, MT

5. Contacts
 - a. Project Director
Ms. Sara Strissel
Brownfields Coordinator

 300 Second Avenue. PO Box 170. Havre, MT 59501



406-265-9226



www.bearpaw.org

300 Second Ave
PO Box 170
Havre, MT 59501
406.265.9226
[REDACTED]

a. Chief Executive

Mr. Paul Tuss
Executive Director
300 Second Ave
PO Box 170
Havre, MT 59501
406.265.9226
[REDACTED]

6. Population (source: www.census.gov)

Havre, MT	9,213
Box Elder, MT	149

7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	Narrative Info Sheet
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1, 2, 3, 6
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3, 4, 6, 9
The reuse of the priority site(s) will incorporate energy efficiency measures.	3, 4, 6, 9
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3, 6
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority

Bear Paw has attached a letter of acknowledgement from the Montana Department of Environmental Quality as well as a letter from the Chippewa Cree Tribe.

9. Releasing Copies of Applications

Email addresses included in this application are considered confidential.



November 6, 2023

Paul Tuss
Bear Paw Development Corporation
P.O. Box 170
Havre, MT 59501

RE: Letter of Acknowledgment: Bear Paw Development Corporation's Application for a Brownfields Area-wide Assessment Grant

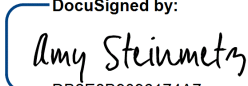
Dear Mr. Tuss:

I am writing to express Montana Department of Environmental Quality's (DEQ's) support for Bear Paw's efforts to obtain a U.S. Environmental Protection Agency Brownfields Area-wide Assessment Grant.

I understand that the assessment grant funds will be used to assess hazardous substance and petroleum contaminated sites in the five (5) counties that your organization represents. DEQ understands that this funding is essential in Bear Paw's efforts in redeveloping Brownfields properties in your area. DEQ supports Brownfields efforts in Montana, and wishes to promote assessment and cleanup activities that allow contaminated properties to be put into productive and beneficial use.

If you have any questions or comments about brownfield sites, please feel free to contact Wally Jemmings at 406-444-6547 or email [REDACTED].

Sincerely,

DocuSigned by:

DB2E8B9096174A7...

Amy Steinmetz, Administrator
DEQ Waste Management & Remediation Division

cc: Wally Jemmings; Brownfields Coordinator; Cleanup, Protection, and Redevelopment Section; [REDACTED]
Jason Seyler; Brownfields Coordinator; Cleanup, Protection, and Redevelopment Section; [REDACTED]

Narrative and Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area - Bear Paw Development Corporation of Northern Montana (Bear Paw), a non-profit economic development organization, is applying for a \$500,000 Brownfields Community-Wide Assessment Grant to assist landowners within the geographic boundaries of Liberty, Hill, Blaine, Phillips, and Chouteau Counties as well as the Rocky Boy's Indian Reservation. Our geographic area consists of 17,670 square miles and 35,213 residents. Primary industries in our area include agriculture, railroad, and natural gas and oil, which have left a legacy of contaminated properties in nearly every small town within our district. Limited access to new infrastructure in our small towns as well as the high cost of construction means developers must utilize existing building inventory within our downtowns. Unfortunately, many of our properties currently for sale or ready for expansion are contaminated with petroleum or asbestos and lead-based paint, which is hindering redevelopment of these sites.

While every county within our geographic boundary is considered disadvantaged by the White House Council on Environmental Quality¹, we plan to focus our assessments in two specific census tracts that are the most disadvantaged. The Downtown Havre census tract (30041040300) is located within the largest town in our geographic area, Havre (Hill County), and includes 3,747 residents. This census tract represents the oldest part of town, where many buildings are in need of investment and renovation, as well as the Highway 2 and railroad corridors, which are the locations of numerous former gas stations and bulk fueling facilities. Our second target area is the Box Elder census tract (30041940300). This census tract is located approximately 25 miles south of Havre along US Highway 87 and includes 2,631 residents in the small town of Box Elder and the Rocky Boy's Reservation. Fee-simple lands around and on the reservation cannot be reused or redeveloped due to the concern of contamination. The award of a FY24 EPA Community-Wide Assessment Grant will allow us to improve quality of life within these two census tracts through the expansion of a community health center, redevelopment of a police and fire station, renovation of the local senior center, and creation of a solar field to reduce energy costs to the Rocky Boy's Indian Reservation. Assessments within these disadvantaged communities will also allow us to move the sites toward cleanup and redevelopment through our existing EPA Brownfields Revolving Loan Fund (RLF) program, which currently has \$2.5 million available in cleanup funding.

ii. Description of the Priority Brownfield Site(s) - We have 18 sites in immediate need of assessment and/or cleanup planning within the geographic boundaries of our region. These properties range in size from 0.13 acres to 42 acres. Of these 18 sites, 4 are petroleum sites, 2 contain solvents, and 12 are suspected to contain asbestos and lead-based paint in building materials. We have selected 4 priority sites to highlight in this application based on their locations within the target areas as well as redevelopment potential and community need:

Bullhook Clinic Homes: The Bullhook Community Health Center (Bullhook) is in the Downtown Havre census tract on 5th Avenue, the main north-south thoroughfare through town. Bullhook is in the process of expanding their existing health clinic to offer more medical, dental, behavioral health, and mental health services. The current health center is on 0.627 acres of land and the building is currently 26,600 square feet. To complete the expansion, Bullhook has purchased vacant homes located on the same city block, and plans to expand the Bullhook campus to approximately 2.8 acres. In preparation for this expansion, five additional homes must be assessed for lead-based paint and asbestos and abated, if necessary, prior to demolition.

¹ <https://screeningtool.geoplatform.gov/en/#7.19/48.4/-110.693>

***Bear Paw Development Corporation
FY24 EPA Brownfields Community-Wide Assessment Grant
Narrative Evaluation Criteria***

Havre Police/Fire Station: Across the street to the south of the Bullhook Clinic lies the combined Havre Police Station and Fire Station in the Downtown Havre census tract. Currently, women are not allowed to serve as firefighters in the Havre Fire Department because the building does not offer a separate women's locker room and dormitory. The Fire Department would like to convert the police station's unused shooting range into these needed spaces to allow women to join the department. However, asbestos, lead, and heavy metals have been confirmed in the shooting range and on surfaces throughout the building at levels of 6.2 million units in a square centimeter, which is dangerously high. The City of Havre would like to utilize Bear Paw's Brownfields RLF to clean up the asbestos and metals, but extensive cleanup planning is needed to evaluate the best approach to remove the contaminants.

Havre Senior Center: Also within the Downtown Havre census tract is the Havre Senior Center, which is owned by Hill County. Currently, the Senior Center offers a daily meal to local seniors with the occasional bingo game. The center would like to offer more education, outreach, and events, but a suspected petroleum release hinders these plans. A Phase I and possible Phase II Environmental Site Assessment (ESA) are needed to evaluate any potential risks the county should consider when determining future investment in and use of the property.

Former Box Elder Landfill: Located 25 miles south of Havre within the Box Elder census tract is the former Box Elder Landfill. The former landfill is 42 acres and operated from approximately the early 1970's to the early 2000's. The property has become a place of violence, illicit drug use, and illegal activity. The current site owner, Hill County, would like to consider redevelopment of the site as a solar farm that would help reduce energy costs to residents of Box Elder and the Rocky Boy's Reservation. However, the former landfill must first be assessed to determine if any hazardous substances are present and if cleanup is required.

iii. Identifying Additional Sites - If grant funds remain after addressing the priority sites listed above, Bear Paw will consider sites from our existing site inventory list as well as market the program through media, community meetings, and word of mouth. For example, we will work with the area newspaper and radio to run a press release about available funding and program benefits. We will also highlight program successes at our annual meeting, in our annual report, and at each board meeting. We will employ a Site Prioritization Matrix tool that will evaluate each site to determine if it is a good fit for our program. Ranking criteria will include whether the site is located in a disadvantaged area; redevelopment potential and timing; commitment of additional resources/leveraging; alignment with local community needs assessments, our Comprehensive Economic Development Strategy (CEDS), and area-specific strategic plans; creation of economic impacts such as jobs, housing, or commerce; and local government and community partnerships. The White House Climate and Economic Justice Screening Tool (CEJST) will be used to determine whether a site is located within a disadvantaged census tract. Our Brownfields Steering Committee will review the Site Prioritization Ranking for each site prior to commencing assessment/cleanup planning.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans - Our assessment and redevelopment goals are directly aligned with Bear Paw's 2020 Comprehensive Economic Development Strategy (CEDS). The CEDS, a regional strategic plan developed by local business and community leaders², identifies the following goals:

(1) Collaborate with Tribal entities to coordinate services, technical assistance, and funding for infrastructure and economic development projects on the Rocky Boy's Indian Reservation AND (2) Enhance the development and delivery of the region's natural and renewable resources, including alternative energy options.

² 2020_CEDS_Final-e.pdf (bearpaw.org)

***Bear Paw Development Corporation
FY24 EPA Brownfields Community-Wide Assessment Grant
Narrative Evaluation Criteria***

The development of a solar field on the former Box Elder Landfill site adjacent to the reservation will help reduce energy costs to area residents, allowing for more discretionary income on the reservation. The CEDS also identifies several opportunities (in italics). *Removal of blight; downtown investment:* Redevelopment of the Bullhook Clinic homes will remove blight in downtown Havre given many of the homes are uninhabitable due to lack of maintenance. Redevelopment of the Havre Senior Center and Police/Fire Station will also create downtown investment. *Diversifying the economy and creating high-paying jobs and Increase health care opportunities:* The expansion of the Bullhook Health Center will create numerous high paying jobs for medical professionals in the Havre community and will increase health care opportunities for residents, including low-income and uninsured community members.

ii. Outcomes and Benefits of Reuse Strategy - Redevelopment of the priority sites will result in numerous benefits to the target areas as well as consideration for climate/adaptation/mitigation measures, given extreme heat and drought have become concerns for our area. The Bullhook Clinic expansion is expected to create approximately 15 jobs above the median household income. With job creation in the medical field comes new residents to the Havre community, which results in more funding for our schools and has a multiplier effect on money spent at locally owned businesses. The Bullhook expansion will incorporate the use of drought-tolerant plants and xeriscaping as well as the incorporation of numerous trees to protect residents from heat and drought. The Havre Police/Fire Department expansion project would create employment opportunities for approximately 2 new firefighters who would also serve as Emergency Medical Technicians (EMTs). This would improve area residents' access to fire suppression as well as emergency medical care and ambulance services. The redevelopment would include energy efficient lighting and insulation as well as water-efficient fixtures. Redevelopment of the Havre Senior Center will allow Hill County to offer more services to our increasing aging population, resulting in a healthier senior community with a longer average lifespan. The Senior Center improvements would include energy efficient lighting and insulation, water-efficient fixtures, and a reflective roof for the currently flat roof line, which will reduce sensitivity to extreme heat during the summer months. The former Box Elder landfill project will preserve greenspace for a non-profit solar energy field to reduce energy costs both on and around the Rocky Boy's Reservation and improve the area's access to renewable energy. The energy costs savings will increase discretionary income for area residents.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse - Bear Paw utilizes our expertise regarding federal and state funding sources to connect landowners to funding for cleanup and redevelopment. Funding for the Bullhook Clinic Homes cleanup will be secured through a loan from Bear Paw's Brownfields RLF program. Redevelopment will be funded through the Community Health Center Fund, which is appropriated by Congress annually and provides grant funding under Section 330 of the Public Health Service Act. The Havre Police/Fire Station cleanup will also be funded through Bear Paw's Brownfields RLF program. Subsequent redevelopment costs will likely be covered through grant funding from the Department of Justice's grant program as well as the Assistance to Firefighters Grants Program and the Staffing for Adequate Fire and Emergency Response (SAFER) Grant program, both administered by the U.S. Department of Homeland Security. If any petroleum cleanup is required at the Hill County Senior Center, cleanup funding will likely come from the Montana Petroleum Tank Release Compensation Board (Petrofund) as well as Bear Paw's Brownfields RLF program. Funding for the improvements to the center will include grants from the Community Development Block Grant Program. Cleanup required at the former Box Elder Landfill will be funded by Bear Paw's Brownfields RLF program, while redevelopment funding to build a solar field will come from a variety of funding sources, including the Rural Energy for America Program (REAP), U.S. Department of Energy Office of Indian Energy, and the State of Montana's EPA Climate Pollution Reduction Grant program.

ii. Use of Existing Infrastructure - With the exception of the former Box Elder Landfill, our priority brownfields sites are all connected to community water and sewer and have power, natural gas, phone, and high-speed internet available. Sites within the Downtown Havre census tract all focus on infill development and do not require any additional infrastructure. The former Box Elder Landfill site will require additional infrastructure to connect the solar field to the power grid and provide electricity to area residences and agricultural producers. Funding for the additional infrastructure will come from the U.S. Department of Agriculture's Rural Energy for America Program (REAP) as well as the U.S. Department of Energy Office of Indian Energy grant programs.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding - Bear Paw and the communities within our demographic region and target areas have no funds for brownfield assessment. While our geographic area is large (17,670 square miles), we only have 35,213 residents across all five counties, giving us a very limited tax base to fund community needs. Per capita income for the geographic area is \$40,942 compared to \$47,538 for Montana and \$54,538 for the nation. The poverty rate for the geographic area is 20.4%³. The town of Havre has a population of only 9,213 residents with 3,747 of those residents living within the target area of the Downtown Havre census tract. In households within the Downtown Havre census tract, income is less than twice the federal poverty level and rank in the 87th percentile for poverty in the nation. Similarly, the Box Elder census tract has a population of only 2,631. Household incomes within this tract are also less than twice the federal poverty level, and rank in the 96th percentile for poverty in the nation⁴. Funding of this grant request will allow expansion of our community health center, which provides medical, dental, and mental health services to residents throughout the entire geographic area, including those who are uninsured and low-income. It will also allow us to expand our firefighter and EMT services to serve residents more adequately within the Havre community, provide wellness opportunities for our senior citizens, and develop a solar field to cut energy costs for individuals living in extreme poverty within the Box Elder census tract.

ii. Threats to Sensitive Populations

1. Health or Welfare of Sensitive Populations - American Indians are an important sensitive population within both of our target areas. American Indians account for 20% of the population in the Downtown Havre census tract and 93% of the population in the Box Elder census tract. The average life expectancy for Native Americans within these two census tracts is about 13.5 years shorter than that of their white counterparts⁵. A recent community health survey of Native Americans within the two census tracts showed only 44% of community members reported having a regular doctor that they see for medical issues while 64% reported trouble accessing adequate medical care in the past year. 32% of those surveyed reported they had a friend or relative who had attempted suicide in the past year⁶. The expansion of the Bullhook Community Health Center will provide greater access to medical and mental health services for Native Americans within our target areas. Poverty in these communities plays a primary role in the increased rate of mental illness and substance abuse. While redevelopment of the former Box Elder Landfill as a solar field won't alleviate poverty within the Box Elder census tract, the provision of low to no cost energy would help residents stay warm in Montana winters, help reduce the stress of paying the electricity bill each month, free up discretionary income, and hopefully create better living conditions for area residents, improving mental health and substance use rates.

³ US Census Bureau, American Community Survey, 2018 5-year Estimates

⁴ <https://screeningtool.geoplatform.gov/en/#10.67/48.5044/-109.7046>

⁵ US Census Bureau 2016 RB, MTPHHS HCCHP 2015.

⁶ https://mthcf.org/wp-content/uploads/2017/04/Chippewa_Cree_Tribe_Community_Health_Assessment_2019.pdf

2. *Greater Than Normal Incidence of Disease and Adverse Health Conditions* - Brownfields and contaminants found therein have led to health concerns for residents within the target areas. Petroleum releases, which is suspected at the Havre Senior Center, have high levels of benzene which is known to cause leukemia and other cancers. While census tract data was not available, the EPA Environmental Justice Screening Tool (EJScreen) shows residents in Hill County (where both target areas are located) rank in the 86th percentile in the state for proximity to both diesel particulate matter and underground storage tanks. Leukemia rates were not available given the small population of Hill County, but overall cancer rates for Native Americans in Hill County are at 684 cases per 100,000, compared to the state average of 589 and the national average of 393 for Native Americans, and a state average of 451 and national average of 462 for their white counterparts⁷. The assessment and cleanup of sites like the Hill County Senior Center and the former Box Elder Landfill will reduce residents' exposure to benzene and other contaminants.

Similarly, numerous buildings throughout the target areas are contaminated with asbestos, a known cause of asbestosis, mesothelioma, and lung cancer. Hill County has a lung cancer incidence rate of 68.5 per 100,000 for all races, the second highest in the state, compared to the state average of 47.5 and the national average of 54.0. Native American residents in Hill County suffer from a lung cancer incidence rate of 176.2, the highest in the state, compared to 96.1 for the state and 52.0 for the nation for Native American populations⁸. Hill County is also in the 92nd percentile in the state for exposure to lead-based paints. Assessment and cleanup of sites like the Bullhook Clinic Homes and Havre Police/Fire Station will reduce residents' exposure to asbestos-containing materials as well as lead-based paint.

3. *Environmental Justice*

a. *Identification of Environmental Justice Issues* – According to CEJST, all four priority sites listed in this application are located in disadvantaged census tracts with significant minority populations. The Downtown Havre census tract ranks in the 87th percentile for poverty in the nation, and 20% of the population is Native American. The Box Elder census tract ranks in the 96th percentile for poverty in the nation, and 93% of the population is Native American. Many properties within these census tracts are older, in greater disrepair, more affordable for rent, and receive little investment and upgrades which means residents and workers at these locations are disproportionately exposed to contaminants because of their low-income and/or minority status. EJScreen shows residents in Hill County rank in the 86th percentile in the state for proximity to both diesel particulate matter and underground storage tanks. Hill County is also in the 92nd percentile in the state for exposure to lead-based paints and 80th percentile for Risk Management Program (RMP) Facility proximity⁹. Given our limited population and income, Havre has only one combined police and fire station, and our community members and city employees have no choice but to utilize a building with dangerously high rates of asbestos fibers and heavy metals on its surfaces. The firefighters live at the station during their shifts and are therefore subjected to exposure at an even greater rate. Havre has only one senior center, so local seniors looking for meals and activities must eat and spend time at a facility where they may be inhaling petroleum fumes from an unidentified petroleum release. Residents in the Box Elder census tract do not

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<https://statecancerprofiles.cancer.gov/incidencerates/index.php?stateFIPS=30&areatype=county&cancer=001&race=07&sex=0&age=001&stage=999&year=0&type=incd&sortVariableName=rate&sortOrder=default&output=0#results>

8

<https://statecancerprofiles.cancer.gov/incidencerates/index.php?stateFIPS=30&areatype=county&cancer=047&race=38&sex=0&age=001&stage=999&year=0&type=incd&sortVariableName=rate&sortOrder=default&output=0#results>

⁹ <https://ejscreen.epa.gov/mapper/>

Bear Paw Development Corporation
FY24 EPA Brownfields Community-Wide Assessment Grant
Narrative Evaluation Criteria

have access to public parks or recreation areas, so adolescents and young adults are often found hanging out around the former Box Elder landfill, potentially being exposed to hazardous substances.

b. Advancing Environmental Justice - Redevelopment of our four priority sites will advance environmental justice in a variety of ways. The Bullhook Community Health Center expansion will provide 15 new, well-paying jobs for residents in a disadvantaged census tract with a low median income. In addition, the health center will provide low-income and minority residents with more access to affordable and quality health care. Cleanup and redevelopment of the Havre Police/Fire Station will reduce exposure to hazardous levels of asbestos and heavy metals for local residents and workers while also allowing the station to hire female firefighters, thus creating jobs and increasing the community’s access to fire suppression and EMT services. The Havre Senior Center cleanup and redevelopment will ensure a safe environment for area seniors to enjoy healthful foods, educational presentations, social events, and engaging activities without being exposed to toxic petroleum fumes. Cleanup and redevelopment of the former Box Elder landfill will prevent adolescents and young adults from coming into direct contact with hazardous waste. Once the landfill is converted into a solar field, the benefits of renewable energy will help create more environmentally friendly energy sources as well as help reduce energy cost burdens for area residents. No displacement of residents or workers will occur. The Bullhook Clinic Homes that are being demolished have been vacant for several years as they have become uninhabitable due to large amounts of black mold and general disrepair.

b. Community Engagement

i. Project Involvement (5 points) and ii. Project Roles - Since 1968, Bear Paw has built strong community relationships and partnerships throughout our geographic region and target areas. Specific project partners for this grant and their roles are outlined below.

Select List of Partners		
Partner	Point of Contact	Specific Role in Project
Bullhook Community Health Center	Kyndra Hall, CEO, 406-395-6904, [REDACTED]	Work with area landowners to solicit community feedback on the Bullhook Clinic Homes project. Provide in-kind meeting space at the clinic to facilitate public meetings. Assist with media outreach, interviews, and publications.
City of Havre, Montana	Doug Kaercher, Mayor, 406-265-6719, [REDACTED]	Provide in-kind public meeting space and facilitate discussion regarding the Havre Police/Fire Station project. Assist with public outreach to area residents as well as city employees. Help disseminate informational materials. Determine site cleanup approach and redevelopment specifications.
Hill County Commissioners	Jake Strissel, Commissioner, 406-265-6481, [REDACTED]	Provide access to the former Box Elder landfill site. Provide in-kind public meeting space for public meetings regarding the project. Attend meetings with the Chippewa-Cree tribe and consider tribe’s needs in planning.
Chippewa-Cree Tribe Environmental Department	Nick Roseman, Brownfields Coordinator, 406-395-4225, [REDACTED]	Act as a liaison to the Chippewa-Cree Environmental Department and tribal government. Provide in-kind meeting space for public meetings regarding the Box Elder Landfill on the Rocky Boy’s Reservation.
Opportunity Link	Barbara Stiffarm, Executive Director, 406-265-3699	Non-profit focused on workforce development and poverty reduction will help share information about the Box Elder Landfill project with the Native American residents and the tribe. Help solicit feedback on the project.
Hill County Council on Aging	Bill Lanier, Director, 406-265-5464, [REDACTED]	Provide in-kind meeting space for meetings regarding the Havre Senior Center. Help solicit feedback from seniors and share information regarding the cleanup and redevelopment of the site with the senior community.
Havre Police Department	Gabe Matosich, Chief of Police, 406-265-4361	Secure site access and leverage funds through other grant funding for the Havre Police/Fire Station project. Solicit feedback and share information with employees working at the facility. Help implement health and safety measures.
Havre Fire Department	Nathan Courtnage, Fire Chief, 406-265-6719	Help leverage funds through other grant funding for the Havre Police/Fire Station project. Assist with site reuse visioning for the women’s locker room and dormitory. Help implement health and safety measures.

iii. Incorporating Community Input - Community engagement has been, and will continue to be, a cornerstone of our Brownfields program. Quarterly meetings will be held with our 12-member Brownfields Steering Committee comprised of local city, county, private industry, and higher education representatives. Program highlights will be included in our quarterly newsletter “Paw Prints” as well as in our annual report. Announcements for public meetings will be included in both press releases in the local newspapers and our Facebook page. Public meetings will be held to discuss each priority site project with the affected community members. For the Bullhook Clinic Homes project, we will hold a public meeting at the clinic and invite area neighbors via mailings and the local newspaper. For the Havre Police/Fire Station project, we will hold our meeting with the city council and invite all employees to attend via e-mail. For the Box Elder landfill project, we will hold one public meeting with the Hill County Commissioners and a second at Stone Child College on the Rocky Boy’s Reservation to communicate goals for the project and solicit feedback from the reservation community. The Havre Senior Center meeting will take place at the center and go over the findings of the assessment. All meetings will accommodate sight, hearing, and ADA needs, as needed. Information will be presented in English and the native Cree language, when appropriate. Meetings will be conducted at a location large enough to allow for proper social distancing protocols and Zoom links will be provided for remote attendance. Community input will be solicited and documented at each meeting. Community members can also submit comments in writing via email, and Bear Paw will issue responses in writing. Our Brownfields Coordinator will oversee the consideration of community input and preparation of a response for routine matters, and our Board President will provide a written response if significant concerns or complaints arise. Community input and feedback will be incorporated into the project whenever appropriate and feasible.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3a. Description of Tasks/Activities and Outputs

Cooperative Agreement Oversight - i. Project Implementation - Bear Paw staff will be responsible for hiring a Qualified Environmental Professional (QEP) within two months of award; updating the Bear Paw Board of Directors on progress quarterly; working with local government entities, landowners, and developers; leading the Brownfields Steering Committee; coordinating with EPA, Tribes, and MDEQ; updating Assessment, Cleanup and Redevelopment Exchange System (ACRES) quarterly; preparing EPA quarterly reports; facilitating site access; attending two national and one regional Brownfields conferences; and general grant management. ii. Anticipated Project Schedule – October 2024 – September 2028 iii. Task/Activity Lead – Bear Paw Development (grantee) iv. Outputs – 1 QEP hired; 16 quarterly board updates; 16 ACRES updates; 16 Board of Directors updates; 2 National and 1 Regional conferences attended; Steering Committee meetings as needed.

Community Outreach - i. Project Implementation - Bear Paw and the selected QEP will be responsible for preparing educational fact sheets and a programmatic brochure; developing project posters to display at meetings; fostering relationships with regional developers; consulting with local affected property owners; maintaining brownfields information on the Bear Paw website (www.bearpaw.org); providing regular brownfields updates on our Facebook page; creating opportunities to engage local press; and hosting public meetings. ii. Anticipated Project Schedule – October 2024 – September 2028 iii. Task/Activity Lead – Bear Paw Development (grantee) iv. Outputs – 4 fact sheets; 4 public meetings; 1 programmatic brochure; 4 project posters.

Site Assessments - i. Project Implementation – Bear Paw will gather access agreements and participation forms from landowners prior to beginning an assessment. Under the direction of Bear Paw, the QEP will begin assessments six months after award date and will complete all assessments three months prior to grant expiration; update Bear Paw’s current EPA-approved Quality Assurance Project Plan (QAPP); and assist with developing and submitting site

Bear Paw Development Corporation
FY24 EPA Brownfields Community-Wide Assessment Grant
Narrative Evaluation Criteria

eligibility forms to EPA and DEQ for review. ii. Anticipated Project Schedule – March 2025 – June 2028 iii. Task/Activity Lead – QEP iv. Outputs – 6 AAI Phase I ESAs; 9 SAPs; 6 Phase II Hazardous Substance Assessments; 3 Phase II Petroleum Assessments; 9 Phase II Reports of Findings.

Cleanup/Reuse Planning - i. Project Implementation – The QEP will be responsible for identifying cleanup options and costs consistent with redevelopment options based on site data and community input. We anticipate completing four cleanup plans to help facilitate redevelopment at four different sites throughout the region. These will include ABCAs, project design, clearance SAPs, and bid specifications for each site. Additionally, a planning contractor will complete a site reuse plan for selected sites, including assistance with community outreach, reuse visioning, creation of site renderings and 3-D models, and identification of key infrastructure for redevelopment. ii. Anticipated Project Schedule – June 2025 – June 2028 iii. Task/Activity Lead – QEP & Planning Contractor iv. Outputs – 4 cleanup plans; 2 site reuse plans.

3b. Cost Estimates – The following table reflects Bear Paw’s budget breakout by task with 92% of the grant funds going toward community outreach, assessment, and cleanup planning. Given we have a Brownfields RLF funded with BIL funding, 62% of our budget is allocated to assessment to move sites to cleanup through our RLF.

PROJECT BUDGET					
Budget Categories	Project Tasks (\$)				
	Cooperative Agreement Oversight	Community Outreach	Site Assessment	Cleanup & Reuse Planning	Total
Personnel	25,000	10,700	-	-	35,700
Fringe Benefits	7,500	3,210	-	-	10,710
Travel	10,000		-	-	10,000
Supplies	-	800	-	-	800
Contractual	-	8,200	309,000	125,590	442,790
Total Direct Costs	42,500	22,910	309,000	125,590	500,000
Indirect Costs	-	-	-	-	-
Total Budget	42,500	22,910	309,000	125,590	500,000

The following explains how costs shown in the project budget table were developed:

1. *Cooperative Agreement Oversight* – Personnel costs: \$20/hour for 1,250 hours = \$25,000; Fringe: 30% of personnel costs = \$7,500; Travel: \$2,000 per person for 2 national conferences for 2 people = \$8,000, and \$1,000 per person per 1 regional conference for 2 people = \$2,000.

2. *Community Outreach* – Personnel costs: \$20/hour for 535 hours = \$10,700; Fringe: 30% of personnel costs = \$3,210; Supplies: \$0.50 color printing costs for 600 brochures and fact sheets = \$300, plus 5 color posters at \$100 each = \$500, for a total of \$800. Contractual: \$130/hr assuming 5 hours per public meeting for 4 meetings (includes travel time) = \$2,600, \$100/hr assuming 6 hours per fact sheet for 4 fact sheets = \$2,400, \$100/hr assuming 8 hours per programmatic brochure = \$800, \$100/hr assuming 6 hours per poster for 4 posters = \$2,400, for a total of \$8,200.

3. *Site Assessments* – 6 Phase Is at \$4,000 each = \$24,000; 6 Hazardous Substances Phase IIs at \$20,000 each = \$120,000; 3 Petroleum Phase IIs at \$55,000 each = \$165,000. Total = \$309,000.

4. *Cleanup/Reuse Planning* – 4 Cleanup Plans at \$15,000 each = \$60,000; 2 Site Reuse Plans at \$32,795 each = \$65,590. Total = \$125,590.

3c. Plan to Measure and Evaluate Environmental Progress and Results - Each quarter, completed project deliverables and outputs will be compared to our quarterly schedule for the grant and be reported in our quarterly report. All outputs will be reported in ACRES quarterly. If any obstacles arise in completing a deliverable, we will discuss the situation with our EPA project officer and develop a plan to achieve the desired outcome in our workplan. We will also maintain up-to-date contact information for each landowner/developer so we will be able to track outcomes of the project after assessment is completed. Anticipated outputs for this grant include: 6 Phase I reports, 9 Phase II reports, 4 Cleanup Plans, 2 Site Reuse Plans, 4 Site Fact Sheets, 1 Programmatic Brochure, and a minimum of 4 Public Meetings. Anticipated outcomes for this grant include: a new solar field; reduced energy costs for the Rocky Boy's Reservation; 17 new jobs created; additional patients served through expanded medical and mental health services; 2 new female firefighters and greater fire suppression and EMT services; and additional healthy meals, activities, and education for area senior citizens.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4a. Programmatic Capability

i. – iii. Organizational Capacity, Structure, and Description of Key Staff – Founded in 1968 as one of the first non-profit economic development organizations created in Montana, Bear Paw is well-qualified to manage a Brownfields Assessment grant, and has managed \$5,450,000 in EPA Brownfields grant funds since 2009. Currently, Bear Paw has 10 full-time staff managing \$13.1 million in state and federal funds. Since 2006, we have managed over \$181 million in public and private funds. We are managed by a board of directors composed of 16 members of local governments within our district.

Mr. Paul Tuss, Executive Director, has more than 20 years of diversified economic development experience and has managed EPA Brownfields funds since 2009. Through his understanding of federal and state funding sources, Mr. Tuss helps leverage funding for Brownfields projects from EDA, HUD, USDA, and the Montana Department of Commerce. As Executive Director, he will be responsible for overseeing the Brownfields Assessment Program and certifying all program requirements, objectives, and deadlines are met.

Ms. Sara Strissel, Brownfields Coordinator, has five years of experience in the non-profit sector and has served as Bear Paw's Brownfields Coordinator for the past three years. Ms. Strissel is responsible for community outreach, Steering Committee and Board updates, site eligibility screening, project scheduling, QEP oversight, project reporting and updates, grant compliance, budget tracking, and ensuring cooperative agreement requirements are fulfilled. To date, Ms. Strissel has successfully managed two Brownfields Assessment Grants, one of which she was able to coordinate projects and spend the majority of grant funds in 2 years. She is also on track to invest \$2.15 million in supplemental RLF funding in seven Brownfields cleanup projects over the next five years.

Ms. Stefnie Redding, Director of Operations, has completed all the financial management for Bear Paw's Brownfields program for the last six years. Ms. Redding is responsible for tracking direct costs to the grant, paying contractor invoices, completing ASAP draws, and reconciling all grant financial statements with account and ASAP balances to ensure grant funding is accounted for accurately. Ms. Redding uses a fund-based accounting system to ensure EPA Assessment funds are managed separately from other funding sources. Should Ms. Strissel be unable to perform her duties, Ms. Redding would be able to meet grant goals and objectives until another Brownfields Coordinator could be hired.

*Bear Paw Development Corporation
FY24 EPA Brownfields Community-Wide Assessment Grant
Narrative Evaluation Criteria*

iv. Acquiring Additional Resources - Upon receiving a signed cooperative agreement, Bear Paw will hire a QEP, who will be contracted to support certain public involvement functions, site assessment, and cleanup planning. All contracts for this program will be completed and consistent with applicable and competitive Procurement Standards in 40 CFR Parts 30 or 31. As an economic development organization, we promote strong labor practices and link members of our communities to potential employment in Brownfields projects by educating local business owners about how they can get involved in each project. For example, on a recent asbestos abatement and demolition project, we invited locally and tribally owned excavation and trucking firms to attend the bid walk so they could introduce themselves to the abatement companies that were bidding on the project as the prime contractor. This approach has allowed local and/or disadvantaged companies and employees to get involved in our projects as subcontractors and/or vendors providing supplies and materials to each project.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

1. Accomplishments – Bear Paw was awarded \$400,000 assessment grants in 2009, 2011, and 2014; \$300,000 assessment grants in 2017 and 2020; a \$1 million RLF grant in 2011 with supplemental funding of \$500,000 in 2017 and \$2.15 million in 2022. Sites assessed and dollars leveraged are reflected in ACRES at the time of this proposal. The following are accomplishments from our three open cooperative agreements:

1. 2020 Assessment Grant – *Outputs:* 3 Public Meetings; 2 Phase I ESAs; 13 Phase IIs; 2 Cleanup Plans; 12 Quarterly Newsletters. *Outcomes:* \$2,820,000 in leveraged funding; 20 updated low-income apartment units; 3 properties moving toward cleanup; 2 community event sites made usable again; 1 new equine center to be constructed by Montana State University-Northern.

2. 2011 RLF Grant – *Outputs:* 1 Community Outreach Plan; 8 Subgrants; 4 loans; 10 properties cleaned up; 35 public meetings; 1 programmatic brochure; 4 cleanup posters created. *Outcomes:* \$10,344,850 leveraged; 110 senior citizens and non-elderly disabled provided with housing and day activities services; 4,000 low-income patients provided with access to consistent health care; 610 residents provided with a new library; after-school programming for 550 area youth; over 530 tons of petroleum-impacted soil removed; over 4,000 gallons of petroleum-impacted groundwater removed; and 19.1 tons of asbestos-containing building materials removed.

3. 2022 RLF Grant – *Outputs:* 1 QAPP; 2 cleanup plans; 1 Clearance SAP; 2 ABCAs; 2 public meetings; 2 loans; 1 petroleum cleanup; 4 asbestos abatements; 2 Community Relations Plans. *Outcomes:* Approximately \$7 million to be leveraged; expanded health services for 4,000 patients; future community dental office; 1,435 of petroleum contaminated soils removed; 600 tons of asbestos-containing building materials removed; 32 tons of lead-contaminated soil removed.

2. Compliance with Grant Requirements – Each quarter, our staff refers to the grant workplan and timeline to ensure that goals for that quarter are achieved. To date, we have submitted 100% of our quarterly reports on time and have provided ongoing updates in ACRES. Past assessment grants were completed on schedule and all workplan requirements met with no funds remaining, in accordance with the cooperative agreements. Our two current open grants are our 2009 and 2022 RLF grants. Our 2009 RLF grant (10/1/2009 – 9/30/24) currently has \$397,968 in funds remaining which are scheduled to be expended on the asbestos cleanup at the Big Sandy Hotel and soil remediation at the former Geraldine Grocery site. Our 2022 RLF (10/1/22 – 9/30/27) currently has \$2,145,943 in funds remaining, and Bear Paw currently has 6 sites waiting for cleanup with these funds. A FY24 Brownfields Assessment Grant award will allow us to assess and ready more sites for cleanup under our RLF grants, ensuring complete utilization of these funds in support of redevelopment in disadvantaged areas in North Central Montana.

Attachment A
Threshold Criteria Response

ATTACHMENT A: THRESHOLD CRITERIA RESPONSE

1. **Applicant Eligibility:** Bear Paw Development Corporation (Bear Paw) is an eligible applicant for an EPA Brownfields Assessment Grant as we are organized as a non-profit 501(c)(3). Documentation of our non-profit 501(c)(3) status from the Internal Revenue Services is provided as **Attachment B**.

2. **Description of Community Involvement:** Community engagement has been, and will continue to be, a cornerstone of Bear Paw’s Brownfields program. We are committed to creating a comprehensive community outreach plan aimed at facilitating public and community engagement within our program. This plan will encompass several key objectives:
 - a. **Informing and Educating:** Our primary goal is to inform and educate our citizens about our Brownfields Program. We will provide ample opportunities for residents to learn more about the program, its objectives, and its impact on the community.

 - b. **Seeking Input:** We value community input, and we will actively solicit feedback on our site inventory. We want to create a platform where concerns regarding contamination on specific sites can be expressed and addressed.

 - c. **Involving the Community in Redevelopment:** As site redevelopment plans are finalized, we will ensure that the community has a say in the decision-making process. This allows residents to actively participate in site cleanup, redevelopment, and reuse efforts.

 - d. **Engaging with the Brownfields Steering Committee:** We will conduct regular meetings with our Brownfields Steering Committee, composed of representatives from local cities, counties, private industry, and tribal government. This collaborative approach ensures a wide range of perspectives and expertise are considered in our decision-making processes.

In addition to our Community Outreach Plan, we will share information via meetings and publications. Quarterly meetings will be held with our Brownfields Steering Committee that consists of 12 representatives from local cities and counties as well as private industry and higher education institutions. Program highlights will be included in our quarterly newsletter “Paw Prints”, our annual report, and on the Brownfields page on our website. Announcements for public meetings will be included in both press releases in the local newspapers and our Facebook page. Public meetings will be held to discuss each priority site project with the affected community members. For the Bullhook Clinic Homes project, we will hold a public meeting at the clinic and invite area neighbors through mailings as and the local newspaper. All meetings will accommodate sight, hearing, and ADA needs,

Bear Paw Development Corporation
FY24 EPA Brownfields Assessment Grant Threshold Criteria

as needed. Information will be presented in English and the native Cree language, when appropriate. Fact sheets will be created to simplify information on each project and used as handouts at the meetings. Meetings will be conducted at a location large enough to allow for proper social distancing protocols and Zoom links will be provided for remote attendance. Community input will be solicited and documented at each meeting. Community members can also submit comments in writing via email, and Bear Paw will issue responses in writing. Our Brownfields Coordinator will oversee the consideration of community input and preparation of a response for routine matters, and our Board President will provide a written response if significant concerns or complaints arise. Community input and feedback will be incorporated into the project whenever beneficial, feasible, cost effective, and scientifically sound.

We will also meet with landowners of sites selected for assessment. The purpose of these meetings will be to gain an understanding of the owner's needs and to determine how to best utilize Brownfields funding to meet redevelopment goals for the site. We will also meet with the landowner and/or developer after a Phase I and Phase II report has been completed to discuss the findings and next steps for cleanup and reuse.

The following actions and deliverables outline our community outreach goals for this grant:

- e. Community Outreach Plan
 - f. Brownfields Steering Committee
 - g. Site-specific fact sheets
 - h. Landowner meetings
 - i. Brownfields webpage
 - j. Engage local press
 - k. Public Meetings
 - l. Conduct in-person meetings at locations large enough to allow for social distancing protocols and provide Zoom links to allow for remote attendance.
3. **Expenditure of Existing Grant Funds:** Bear Paw is currently in the process of closing out our FY20 EPA Assessment Grant (#96855501). As of October 1, 2023, more than 70% of our funding under this cooperative agreement has been received from EPA and disbursed. Documentation of our current grant balance from the Automated Standard Application for Payments (ASAP) is included as **Attachment C**.
4. **Contractors and Named Subrecipients:** NA – Bear Paw has not selected any contractors or subrecipients to conduct any work proposed in this application. Once an EPA cooperative agreement is awarded, Bear Paw will select contractors in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500 prior to beginning any assessment activities.