

# SWEETGRASS DEVELOPMENT

SERVING BLACKFEET AND LITTLE SHELL CHIPPEWA TRIBES, CASCADE, GLACIER, PONDERA, TETON AND TOOLE COUNTIES

## Sweetgrass Development Corporation FY24 Brownfields Assessment Grant Application Narrative Information Sheet

1. Applicant Identification Sweetgrass Development Corporation  
521 1<sup>st</sup> Avenue NW  
PO Box 170  
Great Falls, Montana 59404
2. Funding Requested
  - a. Assessment Grant Type: Community-wide
  - b. Federal Funds Requested: \$500,000
3. Location: Sweetgrass's Brownfield Program serves Glacier, Toole, Teton, Pondera, and Cascade Counties, the Blackfeet and Little Shell Chippewa Tribes, in northcentral Montana.

4. Target Area and Priority Site Information:

Our target areas include the northern Glacier County census tract (30035940400), the town of Browning census tract (30035940200), and the northern Toole County census tract (30101000100). Site addresses for the priority sites proposed in our Narrative include:

Site Name	Address	City, State, Zip
Coop's Corner Conoco	330 W Central Avenue	Browning, MT 59417
Cowboy Museum	215 1 <sup>st</sup> Avenue SE	Browning, MT 59417
Glacier Village Restaurant	304 U.S. Rte 2	East Glacier Park, MT 59434
Suta North	48°53'06" N, 111°54'19" W	Sunburst, MT 59482
Sunburst Car Wash	7 W Main Street & 15 W Main Street	Sunburst, MT 59482

5. Contacts

a. Project Director

Sarah Converse  
Brownfields Coordinator  
521 1<sup>st</sup> Avenue NW  
Great Falls, MT 59404  
406.899.7959  
[sweetgrassdevelopment@gmail.com](mailto:sweetgrassdevelopment@gmail.com)

a. Chief Executive

Sarah Converse  
Executive Director  
521 1<sup>st</sup> Avenue NW

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

Browning, MT	1,018
East Glacier Park, MT	315
Sunburst, MT	333

7. Other Factors

<b>Other Factors</b>	<b>Page #</b>
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, 5, 6, 8
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.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	3, 6
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

Sweetgrass has attached a letter of acknowledgement from the Montana Department of Environmental Quality as well as a letter from the Blackfeet Environmental Office.

9. Releasing Copies of Applications

Not Applicable – The application does not have confidential, privileged, or sensitive information.

**Narrative Information Sheet Attachment**

Letters of Acknowledgement

Montana DEQ

Blackfeet Environmental Office



October 31, 2023

Ms. Sarah Converse  
Executive Director  
Sweetgrass Development Corporation  
521 1st Avenue NW  
Great Falls, MT 59404

RE: Letter of Acknowledgment: Sweetgrass Development Corporation's Application for a Brownfields Assessment Grant

Dear Ms. Converse:


I am writing to express Montana Department of Environmental Quality's (DEQ's) support for Sweetgrass Development Corporation's efforts to obtain a U.S. Environmental Protection Agency Brownfields Assessment Grant.

I understand that the assessment funds will be used to assess hazardous substance and petroleum contaminated sites in Cascade, Teton, Pondera, Toole and Glacier Counties. DEQ understands that this funding is essential to Sweetgrass Development Corporation's efforts in redeveloping Brownfields properties in these areas. 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 contact Colleen Owen at (406) 755-8954 or [COwen@mt.gov](mailto:COwen@mt.gov).

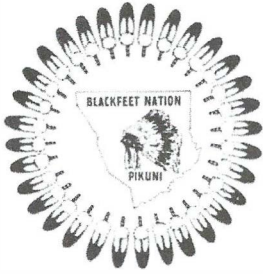
Sincerely,

DocuSigned by:

  
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Amy Steinmetz, Administrator  
DEQ Waste Management & Remediation Division

cc: Colleen Owen; Brownfields Coordinator; Cleanup, Protection, and Redevelopment Section; [cowen@mt.gov](mailto:cowen@mt.gov)  
Jason Seyler; Brownfields Coordinator; Cleanup, Protection, and Redevelopment Section; [jseyler@mt.gov](mailto:jseyler@mt.gov)



# BLACKFEET NATION

P.O. BOX 850 BROWNING, MONTANA 59417  
(406) 338-7521 FAX (406) 338-7530

## EXECUTIVE COMMITTEE

Ilf"Scott" Kipp, Sr., Chairman  
Lauren J. Monroe, Jr., Vice-Chairman  
Patrick Armstrong, Jr., Secretary  
Joe A. Gervais, Treasurer

## BLACKFEET TRIBAL BUSINESS COUNCIL

Timothy Davis  
Lyle Rutherford  
Shelly Hall  
Patrick Armstrong, Jr.  
Virgil Last Star  
Everett Armstrong  
Lauren Monroe, Jr.  
Ilf"Scott" Kipp, Sr.  
Marvin Weatherwax, Jr.

November 13, 2023

Sweetgrass Development Corporation  
Sarah Converse, Executive Director  
521 1<sup>st</sup> Avenue NW  
Great Falls, MT 59404

RE: Sweetgrass Development Brownfields Assessment Grant Application

Dear Ms. Converse:

As Director of the Blackfeet Environmental Office, I am pleased to present you with this letter of commitment and support for Sweetgrass Development's Brownfields grant application to assess sites that may be contaminated with petroleum and hazardous waste throughout the Sweetgrass Development region, including the Blackfeet Reservation.

We have worked with SDC over the past eight years to identify sites on the reservation that would benefit from assessment. These sites have been located on fee-simple land and we are unable to utilize our funding, as they are not tribally owned properties. Our partnership has been incredibly successful, and we look forward to continued conversations. SDC has been able to work with our office and property owners for potential redevelopment and because of the program, additional economic development opportunities have arisen from the redevelopment potential.

The Blackfeet Tribe strongly supports Sweetgrass Development's Brownfields assessment grant application and our department looks forward to our continued partnership and working with your organization to successfully assess properties in our communities.

Sincerely,

Gerald Wagner | Director | Blackfeet Environmental Office | Blackfeet Tribe

## **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**

Sweetgrass Development Corporation (Sweetgrass), a non-profit, economic development organization, is applying for a \$500,000 EPA Brownfields Assessment grant to assess contaminated properties in north-central Montana. Our geographic area includes Glacier, Toole, Teton, Pondera, and Cascade Counties as well as the Blackfeet Indian Reservation bordering the eastern side Glacier National Park. Our geographic area is bisected by two main thoroughfares, U.S. Highway 2 (east/west) and U.S. Interstate 15 (north/south), with the BNSF railway running east/west across the northern portion of the region. Centered around these major transportation routes are several small towns that thrive primarily on agriculture (wheat, cattle, lentils, and other pulse crops) and tourism from travelers passing through the area to reach destinations such as Glacier National Park and Canada. Over the years, businesses supporting the agricultural industry, such as former fueling stations and industrial facilities, as well as properties lining our major transportation corridors, have closed and become blighted properties in need of environmental remediation and future redevelopment.

Within the geographic area outlined above are census tracts 30035940400 and 30035940200 within Glacier County and 30101000100 within Toole County, which make up our three target areas. All three of these census tracts are designated as disadvantaged by the US Climate and Economic Justice Screening Tool (CEJST)<sup>1</sup>. Glacier County is of primary importance for our region because it is the gateway to Glacier National Park and home to the Blackfeet Reservation. Toole County, adjacent to Glacier County to the east, is home to the main U.S. Customs entry point for tourists travelling to and from Canada. These areas are rich with redevelopment opportunities, catering to the nearly 3 million<sup>2</sup> tourists that visit Glacier Park each year and another 1 million<sup>3</sup> that travel through the area into Canada, yet low incomes and small populations make environmental assessment difficult. An EPA Brownfields Assessment grant would allow us to assess blighted properties along our major travel corridors, move them to cleanup through our existing EPA Brownfields Revolving Loan Fund. This will ultimately spur local investment, create jobs, and expand services for our small communities.

#### **ii. Description of the Priority Brownfield Site(s)**

This application highlights five priority sites within our target areas based on input from our communities, redevelopment potential, and community need:

*Suta North* – Located in Sunburst (Toole County; Census Tract 30101000100) directly off an I-15 exit, this 1.8-acre site is a former fueling station with an unresolved petroleum release. The landowner would like to sell the property to the Town of Sunburst for the development of an electric car charging station for travelers visiting the area on I-15. However, additional assessment of the site is needed before the property can be sold and redeveloped.

*Sunburst Car Wash* – Located in downtown Sunburst (Toole County; Census Tract 30101000100) near the I-15 exit lies the Sunburst Car Wash site which spans five city lots across from the rail line. The property is currently for sale, but the threat of contamination from historic use as a lumber yard and car wash has stymied the redevelopment and reuse of this property. Once environmental concerns are addressed, local developers are interested in purchasing the property to construct apartment units to better accommodate the workforce that is currently travelling 60+ miles roundtrip from their homes in Shelby, MT to their jobs at the Canadian border.

*Coop's Corner Conoco* – Located in downtown Browning (Glacier County; Census Tract 30035940200), this 1.59-acre corner lot is situated one block east of the major U.S. Highway 2/U.S. Highway 89 junction. Additionally, several other previously assessed and cleaned-up Brownfield sites are located within a one-block radius and have sparked development interest in the area. Browning is an important tourist hub for those visiting Glacier National Park as it is the nearest town with major services on the eastern side of the park. This site is currently a fueling station with an unresolved petroleum release. Redevelopment plans for the property include expanding the convenience store's services to offer more retail items

<sup>1</sup> Climate and Economic Justice Screening Tool (<https://screeningtool.geoplatform.gov/>)

<sup>2</sup> Stats Report Viewer ([nps.gov](https://www.nps.gov/stats/))

<sup>3</sup> U.S. Customs and Border Protection ([cbp.gov](https://www.cbp.gov/))

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such as clothing and basic household essentials for both locals and passersby, as well as laundromat facilities and a car wash.

*Cowboy Museum* – Constructed in 1921 and located in Browning (Glacier County; Census Tract 30035940200), the former Cowboy Museum building sits vacant. The property is in a prime location given it is directly off U.S. Highway 2 and in Browning’s downtown corridor. However, potential buyers are discouraged by the possibility of asbestos and lead-based paint given the age of the building. Once assessed, an interested developer would like to purchase the site to relocate his established home goods, hardware, and ranching and feed supply store to the larger property.

*Glacier Village Restaurant* – Located in East Glacier Park Village (Glacier County; Census Tract 30035940400) on the Blackfeet Reservation, this 1,100 square foot building, constructed in 1932, sits vacant and boarded-up as visitors turn by onto MT Highway 49, the pathway to the East Glacier Lodge and Two Medicine Park Entrance. Interested buyers would like to redevelop the property as an eatery or local tourist shop but concerns of asbestos and lead-based paint are deterring investment. Reuse of this property will create jobs and amenities for residents of Glacier County and the Blackfeet Reservation while continuing to grow the area’s tourist-based economy.

iii. Identifying Additional Sites

Sweetgrass currently has a site inventory of 15 sites located within the geographic area with 11 of these sites located in the target areas. If we complete assessments on all 11 sites within our target areas with assessment funds remaining, we will then consider projects within our greater five-county geographic area. To solicit community input on additional sites not yet on our site inventory, we will issue a press release, communicate with our board of directors, steering committee members, and local bankers and realtors. When selecting additional sites, we will prioritize projects based on redevelopment plans, community need, feasibility of cleanup and reuse, landowner investment in the project, additional funding sources, and community partners involved in the project. Projects that benefit underserved communities, such as tribal projects, towns with populations of 5,000 or less, areas with persistent poverty where 20% or more of the population has lived in poverty over the last 30 years, and areas with environmental justice challenges and/or close proximity to state and federal superfund sites, will be given preference for assessment funding.

**b. Revitalization of the Target Area**

i. Reuse Strategy and Alignment with Revitalization Plans

Sweetgrass’s 2022-2026 Comprehensive Economic Development Strategy (CEDS), the primary revitalization plan for the geographic area, summarizes community input and leadership goals for the Sweetgrass region. The CEDS identifies several overarching themes, each with specific goals and objectives, including: Workforce/Resident Retention and Community Development; Transportation and Community Infrastructure; Tourism and Supporting the Visitor Economy; and Community Collaborations and Access to Financial Resources. Assessment and redevelopment of our 5 priority sites support these themes as well as their accompanying objectives and goals in the following ways:

*Suta North* – Redevelopment of this site as an electric vehicle charging facility aligns with Goal #1 of the Transportation and Community Infrastructure theme which strives to develop a Regional Comprehensive Transportation Safety Action Plan that will enhance transportation infrastructure along major travel corridors in the region. Redevelopment of this site is also in line with goals of the Montana Department of Transportation and Montana Department of Environmental Quality who have announced that the Bipartisan Infrastructure Law has allowed them to create a plan for the state which will include an early focus on filling large charging gaps along the I-15, I-90, and I-94 corridors ultimately spacing electric vehicle charging infrastructure no more than 100 miles apart. The Suta North site is immediately off an I-15 exit and meets the plan’s criteria.

*Sunburst Car Wash* – Redevelopment of this site into workforce housing near the Canadian border supports Goal #3 of the Workforce/Resident Retention and Community Development theme which aims to increase available housing in the region with a special emphasis on increasing the supply of affordable and workforce housing.

*Coop’s Corner Conoco, Cowboy Museum, and Glacier Village Restaurant* – Redevelopment of these sites promotes Goal #2 of the Workforce/Resident Retention and Community Development theme which focuses on addressing Main Street



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and downtown issues that do not support business growth or community positivity. Redevelopment of these three sites bring additional commerce and retail opportunities while removing blight along the main drags of Browning and East Glacier Park Village. Redevelopment of these sites also supports Goal #3 of the Community Collaborations and Access to Financial Resources theme which states Sweetgrass’s desire to continue to work in partnership with the Blackfeet Nation to support the Tribe’s economic goals.

**ii. Outcomes and Benefits of Reuse Strategy**

Assessment, cleanup (if needed), and redevelopment of our priority sites would provide significant community and economic benefits. Redevelopment of the Suta North site as an electric vehicle charging facility will help accommodate the high-volume of tourists travelling on I-15 through northcentral Montana while boosting the local tourism economy in Sunburst, a small community with less than 400 residents, as travelers will be more apt to visit local shops and eateries while their vehicles charge. Redevelopment of the Sunburst Car Wash will create 12 new multifamily apartment units in the center of Sunburst that will better accommodate the workforce travelling to the Canadian border each day. The expansion of retail services at the Coop’s Corner Conoco will create 2 new jobs and provide both locals and travelers with essential goods that are not otherwise accessible in the area, while the redevelopment of the Cowboy Museum and Glacier Village Restaurant will create 6 new jobs, diversify commercial options for both residents and tourists, and support the economy by capturing tourism dollars that are currently being spent in other markets outside of the Blackfeet Reservation.

Improvements to the Coop’s Corner Conoco, Cowboy Museum, and Glacier Village Restaurant sites will include energy efficient windows, lighting, and insulation. The new apartment units at the Sunburst Car Wash will utilize energy efficient HVAC systems and building materials. The creation of an electric vehicle charging station at the Suta North site supports local climate adaptation and mitigation efforts by encouraging alternative modes of transportation not dependent on fossil fuels.

**c. Strategy for Leveraging Resources**

**i. Resources Needed for Site Reuse**

Sweetgrass Development Corporation is an expert at identifying local, state, and federal funding sources to move a project from the early stages of assessment to completion. As a non-profit economic development organization and federally recognized Economic Development District, we are eligible for a wide variety of funding and have experience applying for and managing grants and loans from various state, federal, and local sources. Landowners and developers who utilize our assessment grant program will also be eligible to apply for our commercial CDBG loan program for site redevelopment and reuse as well as our newly established EPA Brownfields RLF program for site remediation. For each project, we will help landowners identify funding sources that fit their specific needs. For example, the Suta North site is eligible to receive funding as part of the federal Electric Vehicle Infrastructure Deployment Plan, which provides grants to disadvantaged communities to install electric charging stations. Montana has secured \$43 million and intends to use funds to support projects within 1 mile of interstates. Sunburst meets this criterion. The Sunburst Car Wash site may also be eligible to receive financing through the federal Low-Income Housing Tax Credit or Montana Housing Trust Fund Program for multifamily rental homes. Sites within our target areas in Glacier County are included in a federally recognized Opportunity Zone meaning an investor's capital gains must be invested in a Qualified Opportunity Fund with 180 days of the sale or exchange that generated the gains. Investors are then eligible to defer the tax on their capital gains until the earlier of the date the Opportunity Fund investment is sold or December 31, 2026. Specific funding sources that will be sought for each priority site reuse include:

<b>Priority Site Name</b>	<b>Redevelopment &amp; Reuse Funding Sources</b>
Suta North	40% of cleanup costs to be repaid by Petrofund; Montana Tourism and Business Development Grant; Electric Vehicle Infrastructure Deployment Plan funds
Sunburst Car Wash	Low-Income Housing Tax Credits; Montana Housing Coal Trust Housing Program; Montana Multifamily Loan Program
Coop’s Corner Conoco	Petrofund; ICDBG grant funds; EDA Indigenous Communities grants; Opportunity Zone funding; private financing
Cowboy Museum	Private financing -- Developer has already gotten pre-approval for financing provided he can find a location for his business establishment; Opportunity Zone funding

Glacier Village Restaurant	ICDBG grant funds; Native American Business Development Institute grants; EDA Indigenous Communities grants; Siyeh Development Corporation private funding; Opportunity Zone funding
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## ii. Use of Existing Infrastructure

Each of our priority sites represents an opportunity to utilize existing infrastructure and public services. Additional primary right of way infrastructure would not be needed for any of our priority brownfield sites, as we are focusing on in-fill properties within the limits of established communities. All of our priority sites have public water, sewer, electricity, etc. Using existing infrastructure will reduce redevelopment costs.

## 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

### a. Community Need

#### i. The Community's Need for Funding

The counties and towns within our geographic region, and especially in our target areas, consist primarily of sparsely populated, rural communities that do not have the discretionary funding or manpower to assist landowners with environmental assessment, cleanup, and/or redevelopment of brownfield sites due to their small and low-income populations. For example, Census Tract 30035940400 (Glacier County) includes approximately 2,160 square miles (mi<sup>2</sup>) of land in the northern portion of the Blackfeet Reservation, minus Browning, and has a total population of 4,613 (population density of 2.14 people/mi<sup>2</sup>); Census Tract 30035940200 encompasses 11 mi<sup>2</sup> in and around Browning, the Reservation's largest town, and has a total population of 5,333 (population density of 494 people/mi<sup>2</sup>); and Census Tract 30101000100 includes 894 mi<sup>2</sup> in northern Toole County and has a total population of only 1,393 residents (1.56 people/mi<sup>2</sup>)<sup>4</sup>. Median household incomes for both Glacier and Toole Counties (\$39,441 and \$54,137, respectively) are well below the Montana average of \$67,631 and the national average of \$74,755<sup>5</sup>. The small, wide-spread, isolated, and low-income nature of communities in our region make it difficult to assess blighted properties as local, regional, and state governments must manage large swaths of land with very little population and income on which to build a tax base.

Furthermore, many of the challenges the communities in our target areas face are captured through the CEJST interactive map. This tool shows that Browning (Census Tract 30035940200) ranks in the 97<sup>th</sup> percentile for low income, 95<sup>th</sup> percentile for poverty, 92<sup>nd</sup> percentile for unemployment rates, and 96<sup>th</sup> percentile for energy costs. Glacier County (excluding Browning; Census Tract 30035940400) ranks in the 86<sup>th</sup> percentile for low income while northern Toole County (Census Tract 30101000100) ranks in the 61<sup>st</sup> percentile. Another challenge unique to northern Toole County is the quantity of adults with less than a high school education (17%).

An EPA assessment grant will greatly benefit the individuals within our communities by encouraging the establishment of new businesses, creating jobs, increasing wages and household incomes, and strengthening the tax base for our small communities through assessment and redevelopment of our priority sites.

#### ii. Threats to Sensitive Populations

##### *(1) Health or Welfare of Sensitive Populations*

Our most vulnerable populations in the target areas are the indigenous communities in the Blackfeet Reservation and the youth in Glacier and Toole Counties. The Blackfeet Nation faces significant economic challenges with a 31.1% poverty rate (compared to 12.1% for Montana), lower median household income at \$35,955 (compared to \$67,631 for Montana), and lower life expectancy (80-85<sup>th</sup> percentile compared to the U.S.). In addition to economic hardship, the overall welfare of the Blackfeet Nation is of critical concern. A 2017 Community Housing Assessment illustrated alarming suicide rates among both Indian adults and youth when compared to their white counterparts. Substance abuse, including opioids and methamphetamine, is prevalent on the reservation in both adult and youth populations, with serious consequences. For example, the opioid death rate for Native Americans is twice that of non-native people in Montana. The Indian Health Services contribute these spikes due to an increase of the drug availability nationwide, unsatisfactory home conditions,

<sup>4</sup> U.S. EPA Environmental Justice Screening and Mapping Tool – Version 2.2 (ejscreen.epa.gov/mapper)

<sup>5</sup> United States Census Bureau (data.census.gov)

and a lack of proper health care resources. They also acknowledge the underlying issues facing the Blackfeet Nation such as poverty, housing, and food insecurity.

Youth throughout the region, not just on the reservation, are also at disproportionate risk due to drug trafficking routes along the I-15 corridor, leading to increased accessibility to drugs such as fentanyl and methamphetamine. Furthermore, low high school graduation rates (in the 90<sup>th</sup>ile for the U.S.) in western Toole County highlight the lack of access to quality education for some children in this target area.

Redeveloping Brownfield sites in our target areas, including our priority sites, is essential to strengthen our communities. This will stimulate the local economy, improve major traffic corridors, and provide continuous support to our most vulnerable populations.

### *(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions*

While the Blackfeet Reservation experiences disproportionately high rates of asthma (99<sup>th</sup>ile in Browning), residents within the Browning census tract also suffer from chronic diabetes (91<sup>th</sup>ile) and heart disease (96<sup>th</sup>ile). In addition, cancers are common among people on the Blackfeet Reservation in Glacier County. Residents of Glacier County are hospitalized at a rate of 88/100,000 compared to that of 48/100,000 for the state of Montana. Asbestos, a known carcinogen, is commonly found in older commercial and industrial buildings such as the Coop's Corner Conoco, Cowboy Museum, and Glacier Village Restaurant, all located on the Blackfeet Reservation in Glacier County. According to the Blackfeet Community Health Assessment, cancer was the top cause of death for members of the Blackfeet Nation, accounting for 16% of all deaths. Over 30% of cancer deaths on the Blackfeet Reservation are from lung cancer<sup>6</sup>. These health and welfare concerns are compounded by limited healthcare resources for tribal members, as 47% of residents from the Blackfeet Reservation are without health insurance.

In the Town of Sunburst, home of the Suta North and Sunburst Car Wash sites, residents have been exposed to high levels of benzene for the last 70 years due to an underground petroleum plume from the Sunburst Texaco refinery site, and chronic health concerns and cancer prevalence has been associated with the site for several decades<sup>7</sup>. Understandably, residents of Sunburst are particularly concerned about limiting additional exposure to benzene and other known carcinogens on sites such as Suta North and Sunburst Car Wash. Redevelopment of our priority sites will reduce the amount of contaminant exposure for residents within the target areas.

### *(3) Environmental Justice*

#### *a. Identification of Environmental Justice Issues*

Our target areas consist of low-income communities that are disproportionately impacted by several environmental factors. They exist in a negative feedback loop where blighted and contaminated properties are negatively impacting their health and wellbeing; however, they lack the resources to address contamination and improve their communities.

According to the Climate and Economic Justice Screening Tool, all three census tracts comprising our target areas and containing our five priority sites are considered disadvantaged. The Blackfeet Reservation is disadvantaged due to high rates of asthma (93<sup>rd</sup> percentile), their proximity to formerly used defense sites with legacy pollution, and their low-income status (86<sup>th</sup> percentile). The town of Browning is disadvantaged in several categories including climate change (90<sup>th</sup> percentile for projected flood risk and 95<sup>th</sup> percentile for projected wildfire risk), energy (96<sup>th</sup> percentile for energy cost), health (99<sup>th</sup> percentile for asthma, 91<sup>st</sup> percentile for diabetes, and 96<sup>th</sup> percentile for heart disease), workforce development (95<sup>th</sup> percentile for poverty, 92<sup>nd</sup> percentile for unemployment, and 12% of adults with less than a high school diploma), and their low-income status (97<sup>th</sup> percentile). The Toole County census tract is disadvantaged because they are surrounded by other disadvantaged census tracts and are considered low-income (61<sup>st</sup> percentile).

Low-income rates and high instances of poverty make it impossible for people to leave situations where they are forced to live and/or work near environmental toxins that negatively impact their health and wellbeing, but small populations and high unemployment rates do not provide a large enough taxbase for communities to address contamination and

<sup>6</sup> Blackfeet Reservation CHA, 2017.

<sup>7</sup> [http://www.cutbankpioneerpress.com/shelby\\_promoter/news/article\\_11ae4609-aeeb-5bef-ba9c-db6807f4d093.html](http://www.cutbankpioneerpress.com/shelby_promoter/news/article_11ae4609-aeeb-5bef-ba9c-db6807f4d093.html)

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environmental risks. In turn, communities are left in a stagnant, cyclical state where residents are chronically exposed to hazards, but there are no resources available to address them without outside resources such as Brownfields funds.

*b. Advancing Environmental Justice*

A Brownfield Assessment Grant would allow us to advance environmental justice in our target areas while minimizing the displacement of residents and businesses. The revitalization and expansion of businesses and services in Glacier County, including the Coop’s Corner Store and Cowboy Museum in Browning and the Glacier Village Restaurant in East Glacier Park Village, would remediate toxic substances such as asbestos, lead-based paint, and petroleum hydrocarbons that can contribute to chronic health conditions plaguing these communities. Furthermore, these advancements would stimulate the local economy by allowing local businesses to establish, grow, and flourish. This will subsequently increase the tax base so local and Tribal governments can continue to address environmental justice concerns and improve their neighborhoods and towns throughout the Reservation. Over time, this will create additional investment in our most disadvantaged communities to support businesses and attract more tourism in the desirable region, therefore bringing in tourism dollars, creating jobs for residents, and increasing the tax base, and eventually, decreasing rates of poverty and chronic health conditions that plague Glacier County and Blackfeet residents.

Similarly, revitalization in northern Toole County, specifically in the town of Sunburst, will provide space for new services on desirable lots that are currently vacant. The creation of workforce housing at the Sunburst Car Wash site will attract more residents into the area and help expand the town’s economy. Improvements at the Suta North site will allow for more people with electric vehicles to travel through the area while helping combat the global climate change crisis by encouraging alternative energy sources. This investment in the small town of Sunburst could help bring more outside money into the economy and encourage more tourists to stop in Sunburst to shop, eat, and explore all northcentral Montana has to offer.

**b. Community Engagement**

i. Project Involvement and ii. Project Roles

As an economic development organization, we regularly integrate local partners and community leaders into our projects. Specific project partners, their roles, and how they will support our brownfields assessment projects and program are outlined below.

<b>Select List of Partners</b>		
<b>Partner</b>	<b>Point of Contact</b>	<b>Specific Role in Project</b>
Blackfeet Environmental Office	Gerald Wagner, Director Beo.director@gmail.com 406-338-7421	Provide assessment/cleanup oversight on projects within the Blackfeet Reservation boundary; Assist with site identification and connecting us with landowners of fee-simple properties within the reservation; marketing program in Blackfeet country
Siyeh Development Corporation	Dennis Fitzpatrick, CEO dfitzpatrick@siyehdevelopment.com 406-338-5669	As the business and economic development arm of the Blackfeet Tribe, Siyeh personnel will help evaluate the feasibility, redevelopment and startup costs, and funding for redevelopment projects within the Reservation, including Glacier Village Restaurant.
Glacier Port Authority	Talia Edwards glacierportauthority@gmail.com 406-923-8048	Assistance with community outreach, community space, education materials, and soliciting input in Cut Bank and Glacier Counties.
Town of Sunburst, Montana	Ashleigh Byers, Clerk abyers@sunburstmt.com 406-937-2141	Coordinate town resources and leveraged cleanup funding for Suta North and Sunburst Car Wash sites. Advertise and provide public meeting space. Assist with tracking outcomes and achievements of these projects.
Chevron Corporation	John MacDonald John@jmacconsult.com 406-465-3558	Coordinate reuse funding donations from Chevron Corp. for EV charging station located at the Suta North site as part of Chevron’s ongoing community outreach and reparations.
Port of Northern Montana	Larry Bonderud neta@shlbymt.com 406-434-5203/406-450-5196	Assist with public engagement and input on the Suta North and Sunburst Car Wash projects; Help market and promote the EV charging facility to visitors once the site is redeveloped.
Opportunity Link	Barbara Stiffarm, Executive Director 406-265-3699	As a community-based non-profit organization focused on workforce development and poverty reduction, this partner will serve as a community liaison helping share project information and feedback between the grantee and community members.

Our goal is to have a member from each of these identified partner organizations serve on our Steering Committee so they can stay regularly informed on our assessment efforts and be included in site selection decisions.

iii. Incorporating Community Input

To encourage community input on each assessment project, Sweetgrass will employ a variety of communication tools. We will feature project information on our interactive website and create a secure forum to solicit comments and feedback on our projects. We will reach out to the local press with project updates and information, and readers will be invited to submit comments to Sweetgrass staff via phone or e-mail. Public meetings will be held for each project during the grant period to update the community on the assessment findings, cleanup, and redevelopment plans. Each meeting will allow plenty of time for questions and comments. Meetings will be publicly advertised, and a Zoom link will be provided to allow participants to join virtually. Information will be presented in English and the native Blackfeet language, when appropriate. Landowners/developers for each project will be asked to participate in meetings, as well as local community groups, affected residents, and stakeholders. Comments and input will be requested in writing or recorded as official notes from the public meeting and considered by Sweetgrass staff, the QEP (if applicable), Community Partners List (see above) and our Brownfields Steering Committee members. Community comments and feedback will be incorporated into the project whenever beneficial, feasible, cost effective, and scientifically sound.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Description of Tasks/Activities and Outputs**

(i.) project implementation, (ii) anticipated project schedule, (iii) task/activity lead, and (iv) outputs

<b>Task 1: Grant Management</b>
<p><b>i. Project Implementation</b></p> <ul style="list-style-type: none"> <li>• <i>Procurement:</i> Procure QEP</li> <li>• <i>Site Identification:</i> Update site inventory; Prioritize sites; Complete Eligibility Forms; Secure site access</li> <li>• <i>Reporting:</i> Quarterly Reports; ACRES; Annual Financial Reports; Closeout Report</li> <li>• <i>Communication:</i> Coordinate with EPA, landowners, developers, local governments; Meet with Brownfields Steering Committee quarterly to solicit input on site priorities</li> <li>• <i>Education:</i> Travel to 2 EPA National Brownfields Conferences and 2 Brownfields Regional Workshops</li> </ul>
<b>ii. Anticipated Project Schedule:</b> October 2024 – September 2028
<b>iii. Task/Activity Lead:</b> Sweetgrass
<b>iv. Outputs:</b> 1 QEP contract; 10 approved site eligibility forms; 10 access agreements; 16 quarterly reports; 16 ACRES updates (quarterly); 1 final closeout report
<b>Task 2: Community Outreach</b>
<p><b>i. Project Implementation</b></p> <ul style="list-style-type: none"> <li>• <i>Outreach Materials:</i> Create community outreach plan; update Brownfields webpage; monthly newsletter updates; development of 4 project fact sheets; update programmatic assessment brochure</li> <li>• <i>Outreach Meetings:</i> 6 public meetings; one-on-one meetings with landowners, developers, lenders, and real estate agents</li> </ul>
<b>ii. Anticipated Project Schedule:</b> December 2024 – September 2028
<b>iii. Task/Activity Lead:</b> Sweetgrass with assistance from QEP
<b>iv. Outputs:</b> 1 webpage; 48 newsletter updates; 1 Programmatic brochure; 4 project-specific fact sheets; 6 public meetings/workshops; 40+ one-on-one stakeholder meetings
<b>Task 3: Site Assessment</b>
<p><b>i. Project Implementation</b></p> <ul style="list-style-type: none"> <li>• <i>QAPP:</i> Update existing QAPP</li> <li>• <i>Phase I ESAs:</i> Complete 5 Phase Is</li> <li>• <i>Phase II ESAs:</i> Complete 10 Phase IIs (building material inspection reports to include cost estimates)</li> </ul>
<b>ii. Anticipated Project Schedule:</b> December 2024 – June 2028
<b>iii. Task/Activity Lead:</b> QEP
<b>iv. Outputs:</b> 1 Programmatic QAPP; 5 Phase I Reports; 10 Phase II SAPs; 10 Phase II Reports of Findings
<b>Task 4: Cleanup &amp; Reuse Planning</b>

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<b>i. Project Implementation</b> <ul style="list-style-type: none"> <li><i>Cleanup Planning:</i> Prepare ABCAs for 2 sites; Develop cleanup plans for 2 sites; Bid specification documents on 2 individual sites</li> <li><i>Reuse Planning:</i> Prepare conceptual site reuse plans; Develop 3-D models that display the conceptual site reuse design; Create 2 site renderings for each site</li> </ul>
<b>ii. Anticipated Project Schedule:</b> January 2026 – June 2028
<b>iii. Task/Activity Lead:</b> QEP
<b>iv. Outputs:</b> 2 ABCAs, 2 Cleanup Plans, 2 Bid Specification Documents, 2 Conceptual Site Reuse Plans, 2 3-D models (1 per site), 4 site renderings (2 per site)

**b. Cost Estimates**

The following table displays our budget breakdown by task for the proposed project with written rationales below. 82% of funding is allocated for site-specific assessment and planning activities.

PROJECT BUDGET					
Budget Categories	Project Tasks (\$)				
	Grant Management	Community Outreach	Site Assessment	Cleanup & Reuse Planning	Total
Personnel	\$41,600	\$10,400	\$0	\$0	\$52,000
Fringe Benefits	\$12,480	\$3,120	\$0	\$0	\$15,600
Travel	\$12,000	\$1,600	\$0	\$0	\$13,600
Supplies	\$0	\$1,000	\$0	\$0	\$1,000
Contractual	\$0	\$8,400	\$321,000	\$88,400	\$417,800
<b>Total Direct Costs</b>	<b>\$66,080</b>	<b>\$24,520</b>	<b>\$321,000</b>	<b>\$88,400</b>	<b>\$500,000</b>
Indirect Costs	\$0	\$0	\$0	\$0	\$0
<b>Total Budget</b>	<b>\$66,080</b>	<b>\$24,520</b>	<b>\$321,000</b>	<b>\$88,400</b>	<b>\$500,000</b>

**Task 1: Grant Management** – Personnel Costs: \$50/hr for 4 hours/week for 4 years = \$41,600; Fringe Benefits: 30% of Personnel Costs = \$12,480; Travel Costs: Assumes sending 2 employees to 2 National Brownfields Conferences and 2 regional EPA roundtable workshops with rates of \$400 for airfare + \$750 for lodging + \$250 for per diem + \$100 for transportation = \$1,500/employee/conference or workshop for a grand total of \$12,000.

**Task 2: Community Outreach** – Personnel Costs: \$50/hr for 1 hour/week for 4 years = \$10,400; Fringe Benefits: 30% of Personnel Costs = \$3,120; Travel Costs: Assumes 2 trips/year for 4 years at \$200 = \$1,600; Contractual Costs: \$120/hr for 5 hours for preparation, travel, and attendance of 6 public meetings = \$3,600 and \$120/hr for 40 one-hour meetings with landowners/stakeholder = \$4,800 for a total of \$8,400.

**Task 3: Site Assessments** – Contractual Costs: Assumes \$5,000 for QAPP Update + \$4,650/Phase I ESA x 5 sites = \$23,250 + \$22,800/Phase II Building Materials Investigation x 5 sites = \$114,000 + \$36,750/Phase II Subsurface Investigation x 5 sites = \$183,750 for a grand total of \$321,000. It should be noted that costs for Phase I and II investigations are estimated averages, and the cost per investigation will depend on site-specific details.

**Task 4: Cleanup & Site Reuse Planning** – Contractual Costs: 4 ABCAs at \$3,660 each = \$14,640 + 4 cleanup plans at \$6,540 each = \$26,160 + 2 bid specification documents at \$8,200 each = \$16,400 for a total of \$57,200 for Cleanup Planning; 2 redevelopment plans at \$6,000 each = \$12,000 + 2 3-D redevelopment models including 2 site renderings at \$9,600 each = \$19,200 for a total \$31,200 for Redevelopment Planning. Grand total for task = \$57,200 + \$31,200 = \$88,400.

**c. Plan to Measure and Evaluate Environmental Progress and Results**

Our Brownfields Coordinator will be responsible for tracking and measuring progress toward site assessment and eventual cleanup, redevelopment, and reuse. The coordinator will review the commitments of our EPA workplan each quarter and

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document progress via quarterly reports and ACRES. Furthermore, our extensive network of community partners and established local relationships will allow us to maintain communication regarding final outcomes and achievements for each site to report in ACRES even after the conclusion of the assessment project. Any challenges or difficulties relating to the proposed project will be discussed promptly with the EPA Project Officer to develop a solution and plan of action to achieve the desired outcome(s) described in the workplan. We are confident assessments will be completed within the four-year grant timeline. Final outcomes will include 1 EV charging station, twelve new apartments, 20+ jobs created, 2 new businesses created and 1 significantly expanded, additional tax base, removal of blight on a large portion of the downtown areas, additional revenue sources for the county and reservation, and a healthy, ongoing working relationship with the Blackfeet Nation.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

**i. Organizational Capacity, ii. Organizational Structure, iii. Description of Key Staff**

Sweetgrass is well qualified to manage an EPA Brownfield Assessment grant, as proven by our successful management of \$700,000 in EPA Brownfield grant funds since 2015. Established in 2004, Sweetgrass is a private, non-profit corporation that acts as the federally certified Economic Development District for northcentral Montana and aims to support economic development in Cascade, Glacier, Pondera, Teton, and Toole Counties as well as in the Blackfeet Nation and Little Shell Tribe of Chippewa Indians of Montana. Sweetgrass supports the diverse communities in this widespread region by providing multiple services including business technical assistance, Brownfields assessment and redevelopment, grant writing, and community networking. In the last five years alone, Sweetgrass has managed over \$19 million in state, federal and matching funds including those from the Economic Development Administration (EDA), EPA, Coronavirus Aid, Relief, and Economic Security (CARES) Act funding, Montana Department of Commerce, Community Development Block Grant (CDBG) Program, Montana Department of Transportation, and local governments.

Currently, our one full-time employee, three part-time employees, and a 18-member Board of Directors work together to achieve the overarching economic development goals of our geographic area. This is done in partnership with a local CPA firm, Gage Accounting, who completes all our daily accounting tasks, financial reporting, and fund-based accounting. Our partnership with Gage Accounting ensures the sources and uses of grant funds, including Brownfield funds, are accurately recorded.

The day-to-day activities of the Brownfields Program will be run by our Executive Director with support from our 7-member Brownfields Steering Committee. Together, this team will ensure that possible assessment opportunities align with the redevelopment goals of our CEDS and that we are adequately meeting the goals of our geographic region and target areas.

Our Executive Director, Sarah Converse, has 14 years of experience managing economic development programs and 8 years of experience managing Brownfields assessment grants. Ms. Converse is responsible for the overall management of our Brownfields Program and certifies that all program requirements, objectives, and deadlines are met. She also serves as the program's spokesperson, communicating with the public and landowners. Ms. Converse will ensure all project goals are on schedule and sites selected for assessment meet the development goals and priorities for the region.

Carrie Taylor is the Business Development and Loan Specialist for Sweetgrass and has served as our Brownfields Coordinator for the past year. Ms. Taylor specializes in small business consulting. Her passion for assisting small business owners achieve their goals led her to a 20+ year career in banking. As a former bank branch president, she focused on ag, commercial, and consumer lending. Ms. Taylor is approachable and skilled at explaining complex and detailed information to landowners in a way that is easy to understand. She is also experienced in performing financial analysis to determine if project redevelopment is feasible and will play an integral role in assisting projects as they transition from assessment, to cleanup, and eventually redevelopment. Ms. Taylor will be responsible for the daily operations of the grant, including reporting, budget tracking, contractor oversight, deliverable and task schedules, and regulator stakeholder communication.

Sweetgrass has curated an extraordinary team of staff, accounting partners, and board and steering committee members with a strong desire to promote redevelopment in northcentral Montana. Under the direction of our Executive Director,

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Brownfields Coordinator, and Brownfields Steering Committee, we are confident that our organization is well-equipped to successfully complete the technical, programmatic, administrative, and financial requirements of this project in a timely manner.

**iv. Acquiring Additional Resources**

Sweetgrass is committed to promoting strong labor practices, supporting local and disadvantaged businesses, and investing in our local economy. These principles will be maintained throughout all proposed project activities including, but not limited to, procurement of a QEP and solicitation of subcontractors for site-specific assessment and planning activities to ensure an equitable selection process for project partners.

Upon receiving a signed cooperative agreement from EPA, Sweetgrass will hire a QEP to assist with community outreach, Phase I and Phase II assessments, and cleanup and reuse planning tasks. Our QEP procurement will be completed in accordance with state and federal laws contained in 2 CFR Part 200. Ms. Converse and Ms. Taylor will assist with preparation and distribution of the RFP, and our Brownfields Steering Committee will help review proposals and select a QEP. Using this process, we will be able to obtain the expertise needed to successfully complete the project in a fair and objective manner.

**b. Past Performance and Accomplishments**

**i. Currently Has or Previously Received an EPA Brownfields Grant**

*1. Accomplishments* - EPA awarded Sweetgrass \$400,000 and \$300,000 Brownfields Assessment Grants in 2015 and 2019, respectively, as well as a \$1 million Brownfields RLF Grant in 2023. Our 2015 grant produced the following outputs: 1 Community Outreach Plan; 1 website; 1 steering committee established; 10 Phase I ESAs; 10 Phase II ESAs; 5 public meetings; 30+ landowner meetings; 1 programmatic brochure; and 4 Fact Sheets. Our 2019 grant produced the following outputs: 11 public meetings; 4 fact sheets; 40+ landowner meetings; 3 Phase I ESAs; 9 Phase II ESAs; and 3 cleanup plans. To date, these two grants have achieved the following outcomes: \$1,817,998 leveraged; 4 properties sold/redeveloped; 6 properties cleaned up; 1 property undergoing cleanup; and 3 No Further Action Letters obtained. These accomplishments are reflected in ACRES at the time of application submittal. Funds from our 2023 RLF Grant only recently became available, and Sweetgrass is working closely with EPA to finalize the cooperative agreement for this project.

*2. Compliance with Grant Requirements* – Sweetgrass has a proven history of completing and exceeding the requirements and goals laid out in our Cooperative Agreements and is in good standing with EPA Region 8. Our Brownfields Program has complied with all reporting requirements, including the filing of quarterly and technical reports and annual financial status forms. All funds have been expended appropriately to achieve the expected grant outputs and outcomes. All site-specific information for assessments is recorded in ACRES and is continuously updated, as needed, as redevelopment continues. All funds from our closed grants were expended completely.

We most recently closed out our 2019 grant on 9/30/2023. Although this grant was originally expected to close out in 2022, Sweetgrass worked closely with EPA to allow for a one-year extension to complete this project as we leveraged an additional \$90,000 in funds from the Montana Petroleum Release Compensation Board (PTRCB or “Petrofund”) to accomplish even more through this assessment grant, and we needed these funds to revolve back to the grant before closeout. Ultimately, we accomplished 50% of our Phase I goal, 100% of our Phase II goal, 183% of our community outreach goals, and 300% of our redevelopment and reuse planning goals under this grant award.

Looking into the future, Sweetgrass is excited to finalize the Cooperative Agreement for our new Brownfield RLF Program. This funding opportunity will expand our Brownfields Program by allowing us to offer funding options for cleanup activities as deemed necessary by site assessments. Our newly founded RLF program will pair nicely with the assessment activities described in this application as this proposed project could create a steady stream of sites eligible for cleanup activities through our RLF program. We anticipate meeting the goals and requirements of the RLF grant within the agreed upon project period.



**Attachment A**  
Threshold Criteria Response

## **ATTACHMENT A: THRESHOLD CRITERIA RESPONSE**

1. **Applicant Eligibility:** Sweetgrass Development Corporation (Sweetgrass) 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:** Sweetgrass highly values stakeholder involvement in the Brownfields assessment process. We will inform and involve community members and stakeholders during planning and implementation of this project.

We will develop a community outreach plan to provide guidance for public and community participation in our program. We will inform and educate our citizens and provide opportunities to learn more about our brownfields program, as well as give opportunities for input on our site inventory and a forum to address concerns regarding contamination on specific sites. Planning efforts will also be instituted as site redevelopment plans are finalized to allow the community to have a voice in site cleanup, redevelopment, and reuse. Regular meetings will be held with our Brownfields Steering Committee that consists of members from local cities and counties, private industry, and tribal government.

To encourage community input on each assessment project, Sweetgrass will employ a variety of communication tools. For each Brownfields project, we will feature project information on our interactive website and create a secure forum to solicit comments and feedback on our projects. We will reach out to the local press with project updates and information, and readers will be invited to submit comments to Sweetgrass staff via phone or e-mail.

Public meetings will be held for each project during the grant period to update the community of the assessment findings, cleanup, and redevelopment plans. Each meeting will allow plenty of time for questions and comments. Meetings will be publicly advertised, and a Zoom link will be provided to allow participants to join virtually. Information will be presented in English and the native Blackfeet language, when appropriate. Landowners/developers for each project will be asked to participate in meetings, as well as local community groups, affected residents, and stakeholders. Comments and input will be requested in writing or recorded as official notes from the public meeting and considered by Sweetgrass staff, the QEP (if applicable), community partners, and our Brownfields Steering Committee. Community comments and feedback will be incorporated into the project whenever beneficial, feasible, cost effective, and scientifically sound.

We will meet with landowners of sites selected for assessment. The purpose of the 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

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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:

- a. Community Outreach Plan
  - b. Brownfields Steering Committee
  - c. Site-specific fact sheets
  - d. Landowner meetings
  - e. Brownfields webpage
  - f. Engage local press
  - g. Public Meetings
  - h. 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:** Sweetgrass recently completed work under their FY19 Assessment Grant (#96892001) as of September 30, 2023. Grant closeout reports will be submitted to EPA by December 31, 2023. At this time, all 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 - Sweetgrass has not selected any contractors or subrecipients to conduct any work proposed in this application. Once an EPA cooperative agreement is awarded, Sweetgrass 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.