

**EPA CLIMATE POLLUTION REDUCTION IMPLEMENTATION GRANT
APPLICATION (General Competition)
Habematolel Pomo of Upper Lake
April 1, 2024**

The Habematolel Pomo of Upper Lake (“Habematolel” or “Tribe”) is a federally recognized Indian Tribe located in Upper Lake, California. The Tribe has fought for almost 120 years to establish and protect Tribal lands where members of the Tribe can thrive, preserve our culture, and create a harmonious and symbiotic relationship with other Tribal and non-Tribal neighbors. The Habematolel embrace five key objectives: 1) preserve our culture, 2) protect the interests of our children, with an emphasis on early childhood development and education, 3) use, conserve and control our Tribal lands and natural resources, 4) promote the stability and security of our Tribe, which in turn provides for the stability and security of our families, including caring for our elders, and 5) promote and grow the Tribe’s economic well-being by creating a sustainable Tribal economy to further self-governance, self-reliance and Tribal sovereignty.

The EPA’s Climate Pollution Reduction Grant Program seeks to reduce harmful Greenhouse Gas Emissions (GHG) and protect both human health and our environment by funding the implementation of effective GHG reduction measures. Both the EPA and the Tribe recognize that significant efforts must be made to protect our environment, not only for ourselves, but for generations to come.

In order to further the climate protection efforts of both the EPA and the Tribe, the Tribe proposes a solution to this problem by implementing key actions identified in its Priority Climate Action Plan (PCAP) including improving solid waste management, increasing recycling efforts, reducing GHG emissions and the construction/operation of biofuels production facilities. The construction and operation of these biofuels facilities would have transformative impacts on furthering the Tribe’s twin goals of climate protection and economic development.

1. OVERALL PROJECT SUMMARY AND APPROACH

a. Description of GHG Reduction Measures

Habematolel Pomo of Upper Lake, a federally recognized Indian tribe (the “Tribe”), was awarded a Climate Pollution Reduction Grant (“CPRG”) from EPA and is now preparing to formally roll out its climate pollution action plan. As a victim of climate change-induced fires in Northern California, the Tribe has devoted a great deal of effort into addressing GHGs. The Tribe has developed a Priority Climate Action Plan to reduce GHGs that, as stated above, includes improving solid waste management, increase recycling efforts and reduce emissions, with its cornerstone being the construction of biofuels production facilities in Maine and Washington capable of producing (in the aggregate) up to 80 million gallons per year from commercial forest waste (commonly referred to as “slash”) or the residue from forest management programs designed to reduce catastrophic forest fires. The Tribe also intends to add a smaller production facility on the Tribe’s reservation lands after the initial building program is complete.

Current Tribal operations generally consist of the operation and maintenance of Tribal governmental facilities including the Tribal headquarters building and call center, Running Creek Casino, several historic buildings in Upper Lake, California that have been acquired by the Tribe and converted into Tribal offices or community facilities, undeveloped property, homes, buildings, roadways, drinking water systems, and septic tanks. Planned future operations include the procurement of land for the construction of multiple biofuel production facilities, construction of the biofuel production facilities, and operation of the biofuel production facilities. The Priority Climate Action Plan (“PCAP”) that was submitted to the EPA on March 1 outlined the following goals/actions:

1. Reduce electricity consumption by 10% on existing Tribal property.
2. Reduce fossil fuel for building use by 10% on existing Tribal property.
3. Reduce fossil fuel consumption for transportation by 10% for existing Tribal vehicle fleet.
4. Reduce solid waste generation by 10% on existing Tribal property.
5. Complete the Workplan for the biofuel production facilities.
6. Select and acquire properties for the biofuel production facilities.
7. Construct and operate the Renewable Fuel Oil (“RFO”) production facilities.

Importantly, the Tribe is poised to rapidly develop the biofuel production facilities. The Tribe, through its wholly owned entity HPUL Green Energy, LLC, is working with its development partners to actively develop multiple biomass to biofuels projects—the first of which are proposed for Maine and Washington (each a “Project” and collectively “The Projects”).

The Projects will contribute to addressing the impacts of climate change by reducing greenhouse gas (“GHG”) emissions. Pomo culture, similar to that of other tribes, stresses the importance of proper stewardship of our lands and natural resources. The Tribe maintains a philosophy that the current generation is responsible for how its actions impact the next seven generations. The Tribe’s dedicated EPA department has long advocated for the importance of protecting the environment and natural resources of the Tribe. PCAP implementation advances our culture and benefits future generations. The Tribe believes its leadership in studying the potential positive impacts of multiple planned biofuels projects on the potential reduction of greenhouse gas emissions plays an integral role in advancing our objectives.

Based on work to date, the Tribe expects that the necessary ingredients are present for successful projects which would convert unwanted (and dangerous) forest residue into biofuel using a proprietary commercial rapid pyrolysis process developed by Ensyn (the “RTP® Technology” or “RTP”). The biofuel may be used as a heating oil replacement in commercial boilers or as a feedstock at refineries, among other uses.

It is important to point out that the Ensyn RTP technology we are deploying is proven at commercial scale in Canada and the U.S., and there are currently 8 operating facilities with the exact same technology and several years of operating history. The process yields are in the 70% range, and availability factors have been 95% or greater for the last 8 years. The technology was jointly developed with Honeywell UOP and they will provide a performance guarantee for the plants we are building.

We have worked diligently to ensure EPA compliance with our feedstock plans, both in terms of compliance with RFS rules that define slash or forest residue, and also in terms of partnering with entities and landowners that are ensuring net green growth (total new growth less harvest and mortality) such that CO₂ absorption is increasing, even as trees are harvested. We can demonstrate and certify that we will not contribute to any net increase in the intensity of logging, and we will contribute to healthier forests.

Additionally, the Tribe will also pursue other carbon sink opportunities, including applications in ag tech and regenerative farming, and invest directly in reducing existing GHG emissions from fossil fuel use and solid waste disposal.

The Tribe operates under a formal constitution which establishes the elected Executive Council as the governing body for the Tribe. The Executive Council has full authority to implement all of the PCAP programs including the priority GHG reduction measures outlined.

Biomass is renewable organic material which comes from plants and animals. As plants grow, they remove carbon in the form of CO₂ from the atmosphere via photosynthesis. When plants are harvested in agricultural and forestry applications, once the primary products (e.g. foods, lumber, etc.) have been collected, much of the material remains in the form of low-value residuals. Ensyn's rapid thermal processing technology recovers these residuals and efficiently converts them into higher value, biogenic carbon-based products.

Depending on the use of the products made using RTP® technology, some CO₂ may be emitted. For example, when fast pyrolysis bio-oil is used as a fuel, the biogenic carbon in the fuel is emitted as CO₂. Since the source of the carbon was biomass, all the CO₂ emitted was originally taken from the atmosphere by the plants during their growth. Taking a cradle to grave approach, the overall timeline is typically in the range of 1-100 years. This is on the order of a human lifespan and is why the use of biogenic carbon is considered carbon neutral, unlike its fossil counterpart.

There are other applications where biogenic carbon in the products from RTP is not emitted. Rather, the carbon is sequestered resulting in a net reduction of carbon circulating in the atmosphere. This is possible in sequestering applications or in a bioenergy application with carbon capture and storage configuration.

As it relates to each of the Projects (the "Maine Project" and the "Washington Project"), the following summarizes the current state of each opportunity:

Maine Project

A. Site Work:

1. Site Option Strategy:

- The development team has negotiated a site option in Millinocket and another in East Millinocket. Each option is a "no regrets" option because we know that each site meets the essential requirements including feedstock, power (a hydropower connection with ample power at \$.06/kWh), appropriate ingress and egress and sufficient water resources.
- Currently, Millinocket is the preferred site.

2. Engineering, Procurement and Construction (“EPC”) Strategy:

- Contractors will be selected based on their ability to professionally perform the required services, broadly including Front End Loading (“FEL”), Detailed Design, Procurement, Construction, and Startup & Commissioning at a competitive price while considering the value added to the development (lowest bidder is not always the best choice) as well as the overall Project risk profile.
- Certain FEL activities including, but not limited to, site assessment, engineering feasibility, preliminary plans and equipment layouts, and geotechnical assessments, may be performed by local engineering firms when technical and commercial drivers warrant this approach.
- The Detailed Design, Procurement, and Construction activity – whether direct-hire or construction management (“CM”) of subcontractors – will be performed by a nationally recognized EPC/EPCM contractor with the experience and willingness to perform the Project on a lump sum or lump sum-turnkey basis. The list of potential bidders currently includes S&B (previous experience with Ensyn technology through subsidiary Ford, Bacon, and Davis), Zachry Group, and Burns & McDonnell. Future contractors to be added as appropriate after vetting technical capabilities, experience with projects of this magnitude, and their interest in partnering for the development.

3. Ensyn Support - EPC:

- As a technology partner, Ensyn will play an integral role in the Project execution process. Specifically, site feasibility support, RTP technology process design, procurement and supply of RTP equipment, review of conceptual design information and data, review and assistance with detailed design activities, assistance in contract negotiation, and general support for oversight and management of project development and contract execution.

B. Feedstock Strategy:

- The location will use feedstock that complies with the federal Renewable Fuel Standard (RFS) mandates, which restrict forest-derived wood to material from non-federal forests that fall into one of three categories:
 1. Slash (tops and branches) generated during timber harvesting of other products (e.g., sawlogs and pulpwood);
 2. Pre-commercial thinnings, and
 3. Wood from forest plantations, where the timberland was an established plantation prior to December 2007.
- Within a 2-hour drive time of Maine’s Katahdin Region there are 6.1 million acres of private timberland. Existing timber harvesting on this land generates roughly 1.4 million green tons of slash annually, nearly 5 times the volume required for the proposed biorefinery. Due to the naturally regenerating forests of the region and limited use of pre-commercial thinnings, slash will be the primary feedstock utilized in Maine. This location has a feedstock plan that has received a letter endorsing the procurement strategy from the Environmental Protection Agency, issued July 28, 2022.

- The feedstock plan was developed by Eric Kinglsey at INRS. INRS will serve as point person for facilitating the negotiations in the feedstock agreements.

C. Offtake Strategy:

- The Project has solidified demand for a minimum of 17.5 million gallons per year of renewable heating oil from a variety of customers.
- After the execution of the lease option, the Project will engage in community outreach to affirm to customers that the Project is officially advancing towards realization and stimulate additional interest from potential offtake clients who align with our mission. This outreach also sets the stage for future collaborations and partnerships.

D. Community Benefits:

In addition to meeting the Tribe's GHG and economic development objectives, the Maine Project holds substantial potential for significant contributions to the economic growth of the state of Maine and the Millinocket region, spanning various sectors including forestry, renewable fuels, and trucking.

Forestry Industry:

- **Job Creation:** The Maine Project involves the procurement of biomass feedstock, requiring the services of licensed professional foresters. This creates job opportunities within the forestry sector, positively impacting employment rates.
- **Market for Wood Fiber:** The Maine Project provides a market for U.S. EPA-certified wood fiber, contributing to the sustainability of the forestry industry in the Katahdin region.

Renewable Fuels Industry:

- **Capital Investment:** The Maine Project anticipates a significant capital investment, potentially exceeding \$200 million. This infusion of funds will not only support the Project, but also stimulate economic activity in the region. The Maine Project will contribute to the local energy sector by providing a sustainable alternative and reducing dependence on traditional fossil fuels.
- **Job Creation:** During construction, the Maine Project is expected to create over 100 temporary construction jobs. Post-construction, the Maine Project is anticipated to sustain approximately 150 jobs both in the facility and in support of the facility's supply chain across several different industries.

Trucking Industry:

- **Transportation of Biomass:** The Maine Project's operations will necessitate the transportation of biomass feedstock to the facility. This creates opportunities for the local trucking industry and increased demand for transportation services.
- **Distribution:** With sales offtake contracts for FPBO, there will be a subsequent need for trucking services to distribute the products, further benefiting the local trucking industry.

In summary, the Maine Project is poised to have a multifaceted impact on the economic landscape of the Katahdin region. It not only brings about direct economic benefits through job creation and capital investment, but also serves as a catalyst for the growth of interconnected industries, such as forestry, renewable fuels, and trucking. The Maine Project's commitment to sustainability and innovation aligns with the broader goals of economic development in the region.

Washington Project

A. Site Work:

1. Site Option Strategy:

- The 3 preliminary proposed site locations are: (i) Hoquiam (up to 3 sites owned or controlled by one of our advisors); (ii) a 35-acre site in Elma owned by the Satsop Industrial Development Authority; and (iii) the Green Diamond Mill 5 site in the Stillwater Industrial Park in Shelton.
- Currently, the Washington Project is conducting feedstock surveys to determine optimal potential locations that leverage feedstock availability and proximity to offtake customers. Using the study results, the Washington Project will then confirm that potential sites have economically feasible access to transportation, power and water sufficient to meet plant needs.

2. Engineering, Procurement and Construction (“EPC”) Strategy:

- Contractors will be selected based on their ability to professionally perform the required services broadly including Front End Loading (“FEL”), Detailed Design, Procurement, Construction, and Startup & Commissioning at a competitive price while considering the value added to the development (lowest bidder is not always the best choice) as well as the overall project risk profile.
- Certain FEL activities including, but not limited to, site assessment, engineering feasibility, preliminary plans and equipment layouts, and geotechnical assessments, may be performed by local engineering firms when technical and commercial drivers warrant this approach.
- The Detailed Design, Procurement, and Construction activity – whether direct-hire or construction management (“CM”) of subcontractors – will be performed by a nationally recognized EPC/EPCM contractor with the experience and willingness to perform the Washington Project on a lump sum or lump sum-turnkey basis. The list of potential bidders currently includes S&B (previous experience with Ensyn technology through subsidiary Ford, Bacon, and Davis), Zachry Group, and Burns & McDonnell. Future contractors to be added as appropriate after vetting technical capabilities, experience with projects of this magnitude, and their interest in partnering for the development.

3. Ensyn Support - EPC

- As technology partner, Ensyn will play an integral role in the project execution process. Specifically, site feasibility support, RTP technology process design, procurement and supply of RTP equipment, review of conceptual design information and data, review and

assistance with detailed design activities, assistance in contract negotiation, and general support for oversight and management of project development and contract execution.

B. Feedstock Strategy:

- The location will use feedstock that complies with the federal Renewable Fuel Standard (RFS) mandates, which restrict forest-derived wood to material from non-federal forests that fall into one of three categories:
 1. Slash (tops and branches) generated during timber harvesting of other products (e.g., sawlogs and pulpwood);
 2. Pre-commercial thinnings, and
 3. Wood from forest plantations, where the timberland was an established plantation prior to December 2007.
- In the 10-county area within a 2-hour drive time of Olympia, WA, there are 3.3 million acres of private timberland; 3 million acres (91%) of this private timberland is in forest plantations. Existing timber harvesting operations on private timberland in the region generate an estimated 3.6 million green tons of slash annually, roughly 12 times more than the facility will use annually. Additionally, with the closure of a number of pulp and paper mills in the region over the last several years, there are opportunities to procure small diameter stems from timber plantations for use as a feedstock; private timberlands in the region grow an estimated 11.8 million green tons of wood annually. Much of this is used for lumber production, but there are opportunities to use smaller stems, or sawmill residuals from plantation wood, as an RFS-qualifying feedstock.
- We have begun working with major landowners on the Olympic peninsula to secure the approximately 230,000 green tons of slash and pre-commercial thinnings feedstock requirements to produce the intended volumes.
- The feedstock plan will be further developed by Eric Kinglsey at INRS. INRS will be the point person for facilitating the negotiations in the feedstock agreements.

C. Offtake Strategy:

- We have a signed offtake contract in hand for nearly 80% of the plant output from a major district energy system operator.

D. Community Benefits:

In addition to meeting the Tribe's GHG and economic development objectives and similar to the Maine Project, the Washington Project holds substantial potential for significant contributions to the economic growth of the state of Washington, spanning various sectors including forestry, renewable fuels, and trucking.

Forestry Industry:

- **Job Creation:** The Washington Project involves the procurement of biomass feedstock, requiring the services of licensed Professional Foresters. This creates job opportunities within the forestry sector, positively impacting employment rates.
- **Market for Wood Fiber:** The Washington Project provides a market for U.S. EPA-certified wood fiber, contributing to the sustainability of the forestry industry in the Shelton region.

Renewable Fuels Industry:

- **Capital Investment:** The Washington Project anticipates a significant capital investment, potentially exceeding \$200 million. This infusion of funds will not only support the Project but also stimulate economic activity in the region. The Washington Project will contribute to the local energy sector by providing a sustainable alternative and reducing dependence on traditional fossil fuels.
- **Job Creation:** During construction, the Washington Project is expected to create over 100 temporary construction jobs. Post-construction, the Washington Project is anticipated to sustain approximately 150 jobs both in the facility and in support of the facility's supply chain across several different industries.

Trucking Industry:

- **Transportation of Biomass:** The Washington Project's operations will necessitate the transportation of biomass feedstock to the facility. This creates opportunities for the local trucking industry and increased demand for transportation services.
- **Distribution:** With sales offtake contracts for FPBO, there will be a subsequent need for trucking services to distribute the products, further benefiting the local trucking industry.

In summary, the Washington Project is poised to have a multifaceted impact on the economic landscape in Washington. It not only brings about direct economic benefits through job creation and capital investment, but also serves as a catalyst for the growth of interconnected industries, such as forestry, renewable fuels, and trucking. The Washington Project's commitment to sustainability and innovation aligns with the broader goals of economic development in the region.

b. Demonstration of Funding Need

The largest capital requirements for the Tribe's Priority Climate Action Plan relate to the equity requirements for the planned RFO production facilities, each of which will be capable of producing 20 million gallons per year of RFO.

Based on the historical experience of the Tribe's development partners (who have built multiple RFO production facilities) and assumed inflation rates as observed in similar construction projects, we estimate the total capital needs for each of the first two production facilities to be \$200 million.

Together with our development partners, the Tribe has identified funding sources outside of US Federal Government funding amounting to approximately \$165 million of the \$200 million that is required to build the first plant in Maine and expect a similar structure and execution for the first plant in Washington. Of this amount, up to \$140 million in Maine will be provided through a tax-

exempt municipal bond financing. The Finance Authority of Maine has given the project preliminary approval for that amount, and the project will be issuing the bonds through Piper Sandler. The project also has a commitment of a minimum of \$20 million in Commercial Property Assessed Clean Energy (“CPACE”) funding from Imperial Ridge. The Tribe has invested \$4.5 million already to cover development expenses and secure the rights to the Ensyn technology.

The projects still require approximately \$25 - \$35 million for each plant, in Maine and Washington, respectively. With \$60 million of funding, the project will have secured sufficient capital to build 40 million gallons of RFO capacity across two states.

The Tribe is respectfully requesting funding under the EPA’s Climate Pollution Reduction Implementation Grant Program (General Competition) of \$59,138,837 to successfully implement these important climate protection programs.

c. Transformative Impact

The Tribe, through our highly experienced partners, has secured access to RTP technology. The transformative impact of the RTP technology and the capacity of the Projects is far reaching and includes the immediate impact of the fuel on lifecycle GHG emissions reductions for heating oil customers and refiners and the additional products and end uses that the Projects can help decarbonize. In short, we are accelerating the adoption of fuels of biogenic origin that serve as direct substitutes for fossil fuels and by doing so, contributing to significant reductions in GHG emissions.

The RTP process generates three products from biomass, each in different states of matter:

1. Fast Pyrolysis Bio-Oil (“FPBO”) – a liquid and the primary product
2. Biochar – a solids form of biogenic carbon
3. Biogas – a synthetic gas

The only material which remains once the above is collected is an inorganic ash (similar to ash in a fireplace). Each of the RTP products is effectively a de-ashed biomass, allowing for the adoption and use of biogenic carbon without the pollution and hassle associated with ash handling.

FPBO, the liquid product, is a light, pourable material with the appearance of motor oil. It is easily transported by road, rail or ship.

Biochar is a fine, dry powder-like material. It is primarily carbon, along with some oxygen and hydrogen. This product is recycled within the facility to provide process heat.

The biogas is a split of CO and CO₂, with some hydrogen and traces of other gases. This product is recycled within the facility to provide process heat.

RTP serves as a platform technology from which many industries and applications may be decarbonized. These industries include:

1. Heating fuels
2. Transportation fuels
3. Chemicals and foods
4. Mining and metallurgy
5. Battery manufacture
6. Construction materials

Within each of the industries above, there are various pathways in which the products from RTP, and even the technology itself, may be integrated. These pathways range from using the product neat, to intermediate conversion to syngas, to proprietary separation methods for specialty applications.

Applications

Many industries and renewable products may be effectively decarbonized by leveraging Ensyn's RTP technology. Multiple pathways to sustainable products and operations exist.

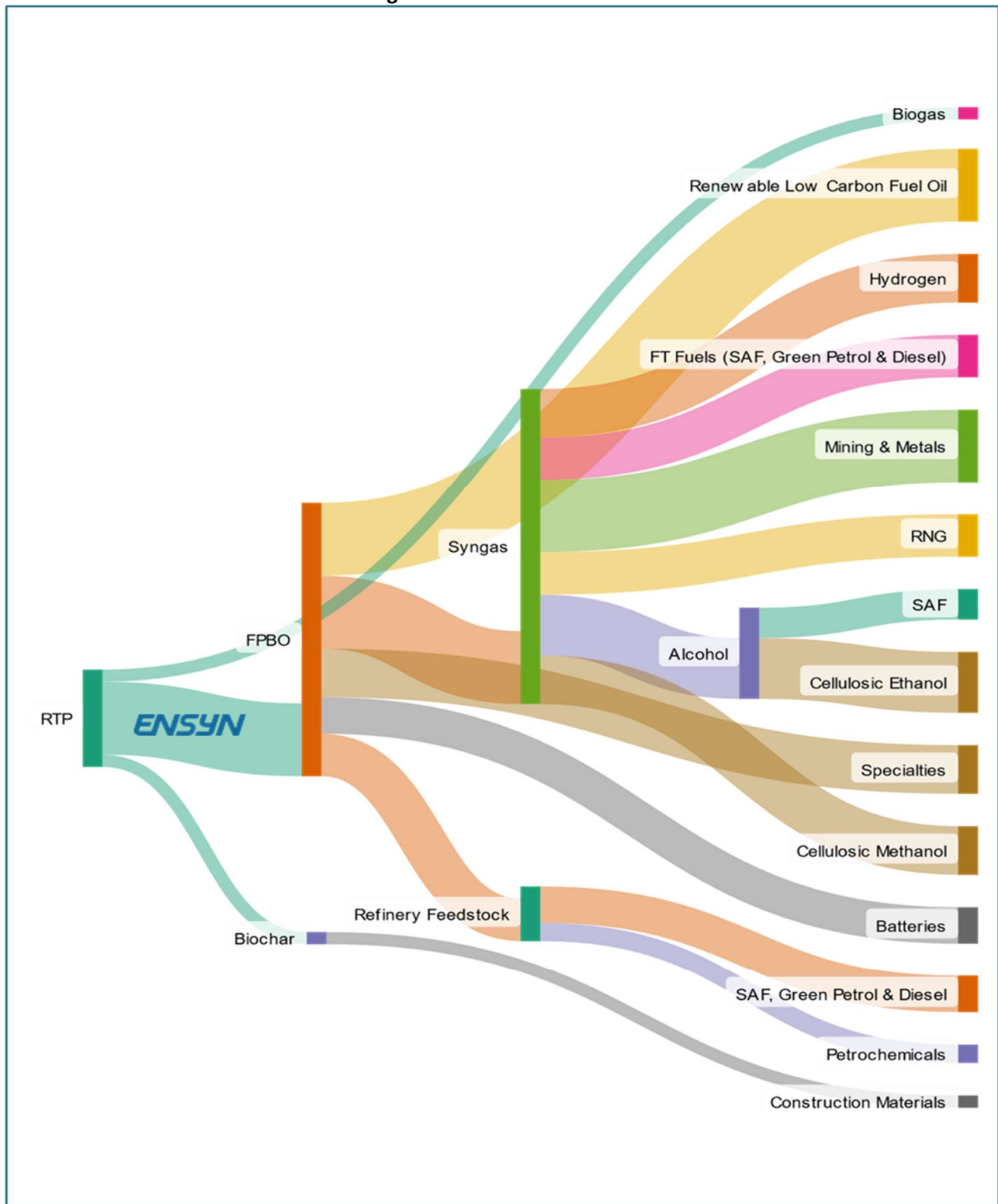
In its simplest form, RTP may be deployed near biomass sources to minimize the impact of raw material transportation on the carbon intensity of RTP's products. This type of installation may be stand-alone in nature, where FPBO is shipped to end users or secondary processing. In this case, biochar and biogas products are recycled within the facility to provide process heat.

In an integrated scenario, FPBO not only may be directed to secondary processing or other end uses, but also to other co-products. In this case, energy recovered from secondary processing may be recycled to the RTP facility to provide process heat.

In the optimal scenario, an integrated facility which has access to a means for CO₂ sequestration (i.e. enzymatic conversion to alcohols, pipeline for down-hole application, etc.) would be employed. By capturing the CO₂ emitted from the various processes along the production chain, a BECCS (bioenergy with carbon capture and storage) configuration is realized.

The diagram following illustrates several pathways in which Ensyn's RTP may be used to produce a variety of sustainable products and decarbonize many industries:

Sustainable Products and Industries using RTP



2. IMPACT OF GHG REDUCTION MEASURES

a. Magnitude of GHG Reductions from 2025 through 2030

The magnitude of the Tribe's GHG Reductions are most closely linked to the ability to develop and construct biofuel production facilities. As mentioned previously, The Tribe has secured access to proprietary and patented technology (i.e., Rapid Thermal Processing or RTP® Technology from Ensyn Corporation) which converts residual non-food biomass from the forest and agricultural sectors to high yields of light liquid biofuels referred to commercially as RFO® ("Renewable Fuel Oil"). The Tribe intends to reduce its own electricity and fossil fuel consumption through updates to infrastructure on Tribal land, but the bulk of GHG reductions stemming from the Tribe's receipt of CPRG funding will be as a result of the Tribe constructing biofuel facilities using RTP Technology.

The Tribe is targeting an aggregate production capacity for RFO of 80 million gallons per year. When compared to oil and natural gas, the RFO product shows a significant reduction in life cycle greenhouse gases. Based upon analysis using the GHGenius model from (S&T)² Consultants Inc. provided as Appendix C of the PCAP attached to this application and the GHG Emission Reduction Calculations Spreadsheet, for every 100,000 MMBtu of natural gas that is displaced by RFO product, a GHG Emission Reduction of approximately 5,241 MTCO₂e is realized, if used for boiler fuel. Similarly, in the case of traditional heating oil, for every 100,000 MMBtu that is displaced by RFO product, a GHG reduction of approximately 8,273 MTCO₂e is realized.

The Tribe expects approximately 80 million gallons per year of capacity to be online by the year 2028 following this schedule:

- 20 million gallons per year of capacity by 2026
- 60 million gallons per year of capacity by 2027
- 80 million gallons per year of capacity by 2028

For reference, 1 million gallons of RFO produces approximately 72,000 MMBtu. This results in a GHG reduction of approximately 3,770 MTCO₂e for every million gallons of RFO used to displace natural gas and reduction of approximately 5,952 MTCO₂e every million gallons of RFO used to displace traditional heating oil.

Following the expected schedule of RFO production capacity coming online, associated yearly GHG reductions are estimated to be:

- **2026** (20 million gallons per year of total RFO capacity):
 - 75,398 MTCO₂e when substituted for natural gas.
 - 119,033 MTCO₂e when substituted for traditional heating oil.
- **2027** (60 million gallons per year of total RFO capacity):
 - 226,194 MTCO₂e when substituted for natural gas.
 - 357,099 MTCO₂e when substituted for traditional heating oil.
- **2028-2030** (80 million gallons per year of total RFO capacity):
 - 301,592 MTCO₂e when substituted for natural gas.
 - 476,132 MTCO₂e when substituted for traditional heating oil.

The overall impact of greenhouse gas reductions varies based on the heating fuel source displaced by RFO. However, the total GHG reductions, stemming from the anticipated production and utilization of RFO, are estimated to fall within the range of 1,206,369 to 1,904,529 metric tons of CO₂ equivalent.

As a direct result of \$30-\$60 million of CPRG grant funding the Tribe estimates that, alongside its partners, it would be able to build two RTP-20 plants, each of which will produce 20 million gallons per year of RFO. The first plant is expected to be built in Maine and the second plant is expected to be built in Washington state.

Following the expected schedule of RFO production capacity coming online above, associated yearly GHG reductions as a result of the Tribe's receipt of funding are estimated as follows:

- **2026** (20 million gallons per year of total RFO capacity):
 - 75,398 MTCO₂e when substituted for natural gas.
 - 119,033 MTCO₂e when substituted for traditional heating oil.
- **2027-2030** (40 million gallons per year of total RFO capacity):
 - 150,796 MTCO₂e when substituted for natural gas.
 - 238,066 MTCO₂e when substituted for traditional heating oil.

As mentioned, the total greenhouse gas reductions vary based on the heating fuel source displaced by RFO. However, the total GHG reductions stemming from The Tribe's receipt of funding, are estimated to fall within the range of 678,583 to 1,071,297 metric tons of CO₂ equivalent.

In addition to the GHG reduction measures taken as part of the construction of RTP-20 plants, approximately 65% of the Tribe's current GHG emissions are associated with fossil fuel and electricity consumption. Accordingly, the Tribe will prioritize measures to reduce fossil fuel and electricity consumption by 10%, resulting in an 11 metric ton annual reduction in GHG emissions. Priority measures will include energy efficiency improvements at the casino and improved management of the Tribe's vehicle fleet. Following that, approximately 17% of the Tribe's GHG emissions are associated with solid waste disposal. The Tribe will prioritize measures to reduce solid waste generation by 10% resulting in a 3 metric ton annual reduction in GHG emissions. Priority measures will focus on reducing solid waste associated with the casino operation. Measures under consideration include improving recycling and separating food waste for commercial scale composting.

b. Magnitude of GHG Reductions from 2025 through 2050

The estimated run rate of Tribal RFO capacity is expected to be 80 million gallons per year by 2028. Assuming there is no additional capacity that comes online, the total GHG reductions, stemming from the anticipated production and utilization of RFO, are estimated to fall within the range of 7,238,215 to 11,427,173 metric tons of CO₂ equivalent.

As referenced in Section 2a, the CPRG funding would contribute to the development of up to 40 million gallons per year by 2027. Assuming there is no additional capacity that comes online, the total GHG reductions, stemming from that anticipated production and utilization of RFO, are estimated to fall within the range of 3,694,506 to 5,832,619 metric tons of CO₂ equivalent.

c. Cost Effectiveness of GHG Reductions

The Tribe, alongside its partners, intends to utilize the upper end of the requested funding range to cover the total equity requirement for constructing two RTP-20 plants. These plants will each have the capacity to produce 20 million gallons per year of biofuel. Obtaining the implementation grant will significantly alleviate the capital costs associated with this ambitious project. With our projected capital expenditures, we are seeking a grant within the range of \$30-\$60 million.

Utilizing the EPA's formula for assessing the Cost Effectiveness of GHG reductions:

Cost effectiveness of GHG reductions = (Requested CPRG funding) / (Sum of Quantified GHG reductions from CPRG funding from 2025-2030)

This calculation yields a Cost effectiveness of GHG Reductions at approximately \$56.01 per MTCO₂e reduction when RFO replaces heating oil, and \$88.42 for each MTCO₂e reduction when replacing natural gas.

d. Documentation of GHG Reduction Assumptions – Please see attachments Techappx_Habematolel Pomo of Upper Lake and GHGCalcs_Habematolel Pomo of Upper Lake

3. ENVIRONMENTAL RESULTS – OUTPUTS, OUTCOMES, AND PERFORMANCE MEASURES

a. Expected Outputs and Outcomes

The Tribe's proposed GHG reduction measures are poised to bring about tangible outputs and outcomes that will not only contribute to the mitigation of climate change but also foster socio-economic benefits within the community.

Through diligent project development efforts, the Tribe is set to establish two RTP-20 units. The first phase in the delivery of an RTP-20 unit, the project development stage involves site sourcing and clearing activities, alongside navigating through local and state-level permitting processes, ensuring compliance with environmental regulations. Two sites are already secured in Millinocket and East Millinocket, Maine. A diligent and successful project development stage will lead to the construction phase of an individual RTP-20 unit.

The construction phase marks a significant milestone, with each RTP-20 unit anticipated to take approximately 18 months to complete. This period will witness a concerted effort from all stakeholders, including the Tribe, Enslyn Corporation, and regulatory bodies, to monitor the construction process meticulously. Adherence to industry standards and efficient cost management practices will be paramount throughout this phase.

Following construction, the commissioning stage will usher in a period of rigorous training for key plant-level staff, ensuring their proficiency in operating the RTP-20 units at scale. Over the course of approximately six months, commissioning activities will focus on ensuring the seamless integration and functionality of each unit, paving the way for efficient and effective operation.

Once operational, the RTP-20 units will be instrumental in maximizing the production of Renewable Fuel Oil (RFO), leveraging Enslyn Corporation's extensive experience in RTP technology. Continuous

monitoring of unit performance will be conducted, tracking key metrics such as RFO production, delivery, and utilization on a per-gallon basis.

In parallel, robust tracking and monitoring mechanisms will be implemented to accurately quantify the reduction in CO₂ equivalent emissions resulting from the displacement of traditional heating fuels with RFO. This involves tracking the delivery and utilization of RFO on a per-gallon and per-MMBtu basis, with data collected and analyzed monthly and reported quarterly. The EPA will be intimately involved with ensuring the accuracy and reliability of the data collected as the use of RFO for renewable heating is done in compliance with the EPA's Renewable Fuel Standard. In order to generate the RIN incentive associated with the use of RFO, the EPA will validate and ensure that the tracking and reporting of RFO use data is accurate, thus reinforcing the integrity of the emission reduction calculations.

Furthermore, the Projects are poised to generate significant employment opportunities, both directly and indirectly. Each RTP-20 unit is expected to create approximately 40 high-quality jobs, spanning various aspects of plant operation. Additionally, the construction phase will generate over 100 temporary construction jobs. Post-construction, each Project is anticipated to sustain approximately 150 jobs, fostering economic growth and stability within the community.

In terms of outcomes through 2030, the Tribe anticipates a substantial reduction in cumulative GHG emissions, estimated to range from 678,583 to 1,071,297 metric tons of CO₂ equivalent from the Tribe's receipt of funding alone. With the addition of up to 40 million gallons per year of RFO production by 2027, the projected GHG reductions are expected to further contribute to mitigating climate change, aligning with the EPA's objectives for reducing greenhouse gas emissions.

b. Performance Measures and Plan

The proposed performance measures for tracking, measuring, and reporting progress towards achieving the expected outputs and outcomes for each GHG reduction measure are outlined as follows:

Project Development and Construction:

- Performance Measure: Timely completion of site sourcing, permitting processes, and construction activities.
- Tracking and Measurement Plan: Regular monitoring of milestones achieved during site preparation, permitting, and construction phases, ensuring adherence to established timelines and budgets.
- Evaluation Approach: Evaluation of progress will involve assessing the completion status of each phase against predefined benchmarks and timelines. Any deviations from the planned schedule or budget will be addressed promptly through corrective actions.

Commissioning and Operation:

- Performance Measure: Effective commissioning and operation of RTP-20 units, maximizing RFO production while adhering to environmental regulations.
- Tracking and Measurement Plan: Continuous monitoring of RTP-20 unit performance, including RFO production, delivery, and utilization metrics.

- Evaluation Approach: Regular assessments of unit performance will be conducted to ensure efficiency and compliance with regulatory standards. Any deviations or inefficiencies will be identified and addressed promptly to optimize operational effectiveness.

Tracking and Monitoring of RFO Utilization:

- Performance Measure: Accurate tracking and reporting of RFO delivery and utilization metrics, including gallons delivered and MMBtu generated.
- Tracking and Measurement Plan: Implementation of industry-standard meters at customer sites to track MMBtu generated from RFO consumption. Monthly data collection and quarterly reporting will be conducted to monitor progress.
- Evaluation Approach: The EPA's involvement in validating and ensuring the accuracy and reliability of the data collected will reinforce the integrity of the emission reduction calculations. Regular audits and reviews will be conducted to verify the accuracy of reported data and ensure compliance with the EPA's Renewable Fuel Standard.

Evaluation of GHG Reductions:

- Performance Measure: Quantification and disclosure of actual GHG emission reductions achieved by each GHG reduction measure.
- Evaluation Approach: Utilization of established methodologies and models, such as the GHGenius model, to quantify GHG emission reductions resulting from the displacement of traditional heating fuels with RFO. The EPA's validation and verification processes as part of compliance with the Renewable Fuel Standard will ensure the accuracy and reliability of reported emission reduction data.

Overall, the proposed performance measures will serve as mechanisms to track, measure, and report progress towards achieving the expected outputs and outcomes established in the workplan. Regular evaluations and assessments will ensure transparency and accountability in achieving GHG reduction targets, ultimately contributing to the Tribe's efforts in combating climate change.

c. Authorities, Implementation Timeline, and Milestones

The implementation of each GHG reduction measure involves collaboration among various parties, each with distinct roles and responsibilities. The parties responsible for implementing the measures, along with their roles and responsibilities, are outlined below:

Tribe (Applicant):

- Roles and Responsibilities: The Tribe serves as the primary applicant and oversees the overall implementation of the GHG reduction measures. Responsibilities include project management, coordination with stakeholders, and required reporting to the EPA in relation to the receipt of the grant.

Castlerock Green Energy and Ensyn Corporation:

- **Roles and Responsibilities:** Ensyn Corporation and its development partner, Castlerock Green Energy, are responsible for providing expertise in Rapid Thermal Processing (RTP) technology and overseeing the development, construction, commissioning, and operation of RTP-20 units. They will also provide training for plant-level staff and ensure efficient operation of the units.

Sub-Awardees and Contractors:

- **Roles and Responsibilities:** Sub-awardees and contractors may be involved in various aspects of project implementation, including site preparation, construction, commissioning, and operation of RTP-20 units. Responsibilities may include procurement of materials, labor, and equipment, as well as adherence to project timelines and budgets.

Other Entities:

- **Environmental Regulatory Agencies:** Authorities responsible for issuing permits and ensuring compliance with environmental regulations, such as air permits.
- **Local and State Government Agencies:** Entities involved in land use permitting and regulatory approvals.
- **EPA:** The EPA plays a crucial role in validating and verifying GHG emission reductions and ensuring compliance with the Renewable Fuel Standard.

Regarding authority, the Tribe has the authority to carry out the proposed measures, including obtaining necessary permits and approvals. In cases where additional authority is required, such as regulatory approvals, the Tribe has a clear plan and timeline to obtain it during the grant period.

Implementation Timeline:

Project Development and Construction:

- **Milestones:** Site sourcing and clearing, permitting processes, construction activities.
- **Estimated Dates:**
 - **Maine RTP-20 Unit:**
 - **Site sourcing:** Complete
 - **Permitting:** Underway, air permits received, balance of permits expected by Q3-Q4 2024
 - **Construction:** Construction expected to begin in Q3-Q4 2024
 - **Washington RTP-20 Unit:**
 - **Site Sourcing:** Q2-Q3 2024
 - **Permitting:** Q2-Q3 2025
 - **Construction:** Q2-Q3 2025

Commissioning and Operation:

- **Milestones:** Training of plant-level staff, commissioning of RTP-20 units, commencement of RFO production.
- **Estimated Dates:**

- Maine RTP-20 Unit:
 - Training of Plant Staff: Q2-Q3 2025
 - Commissioning: Q1-Q2 2026
 - Commencement of RFO Production: Q2 2026
- Washington RTP-20 Unit:
 - Training of Plant Staff: Q2-Q3 2026
 - Commissioning: Q3-Q4 2026
 - Commencement of RFO Production: Q4 2026

Tracking and Monitoring of RFO Utilization:

In the diligent pursuit of accurately tracking and monitoring the utilization of RFO, the Tribe and its partners will establish a contractual requirement for all end users of the RFO product. This requirement will mandate the installation of meters on-site, with ongoing calibration and certification requirements, ensuring precise measurement of RFO consumption.

Each month, total volumes of RFO delivered to end users and subsequently utilized will be meticulously collected. This data collection process will occur consistently and systematically, ensuring comprehensive coverage of RFO utilization across all end user sites.

Furthermore, to uphold transparency and accountability, the collected data will be compiled and reported to the EPA on a quarterly basis. This regular reporting mechanism will facilitate ongoing oversight and validation of RFO utilization, ensuring compliance with the RFS and fostering confidence in the accuracy of emission reduction calculations.

GHG Reduction Evaluation:

In tandem with the meticulous tracking and monitoring of RFO delivery and consumption, the Tribe and its highly experienced partners are committed to quantifying and disclosing the consequential GHG emission reductions stemming from the utilization of RFO.

Each quarter, alongside the comprehensive reports detailing RFO utilization, the Tribe and its partners will diligently calculate and disclose the GHG emission reductions achieved through the displacement of traditional heating fuels with RFO. This meticulous quantification process will be conducted using established methodologies and models, ensuring accuracy and reliability in our emissions data.

Upon completion, these emission reduction reports will be submitted to the EPA for validation and verification. This collaborative effort underscores our commitment to transparency and accountability, as we work hand in hand with regulatory authorities to uphold the integrity of our emission reduction calculations and contribute meaningfully to the fight against climate change.

4. LOW-INCOME AND DISADVANTAGED COMMUNITIES

a. Community Benefits

The Projects, owned and operated by our Tribe, can bring a multitude of community benefits to low-income and disadvantaged communities (both our low-income and disadvantaged Tribal community

and the low-income and disadvantaged remote communities within which these projects would operate).

Currently in the United States, one out of every four Native Americans live at or below the poverty level, the highest rate of any racial group in the United States.¹ Prior to the pandemic, Native American children were twice as likely to experience poverty as their non-Hispanic white peers. This improved during the pandemic as the federal government expanded aid and relief programs which temporarily lifted many Native Americans and their children out of poverty. However, this progress has been short-lived. As many of these temporary government programs end, we are finding again, as of 2022, that one in four Native American Children live in poverty.

This demonstrates a very real need for job creation and governmental support programs to assist poor working-class families. From revenues generated by the Projects, the Tribe would aim to create jobs (both within the Projects and through revenues generated directly to the Tribal government) and expand Tribal programs to promote work incentives, increase educational opportunities and childcare assistance and fund important eldercare programs to help lift Tribal elders out of poverty.

The Tribe predicts it will secure the following advantages:

Job Creation: Biofuels projects require a variety of skills ranging from agriculture to engineering. By providing employment opportunities, particularly in rural areas where job options might be limited, the project can uplift individuals and families out of poverty.

Economic Development: The project can serve as an economic driver for the Tribe and surrounding communities. Revenue generated from the project can be reinvested in local infrastructure, education, healthcare, and other essential services, thereby improving the overall quality of life.

Energy Independence: By producing biofuels domestically, the Tribe can reduce dependence on imported fossil fuels, which can be volatile in terms of price and availability. This promotes energy security and stability, particularly important for communities vulnerable to fluctuations in energy markets.

Environmental Benefits: The biofuel production technology the Tribe will utilize has a lower carbon footprint compared to traditional fossil fuels, leading to reduced greenhouse gas emissions and mitigating climate change. Additionally, this biofuel project can encourage sustainable land management practices, such as reforestation or soil conservation, which benefit both the environment and local communities.

Education and Training Opportunities: This project can provide educational programs and training workshops related to renewable energy, agriculture, and technical skills. This not only enhances the workforce's capabilities but also empowers community members to pursue careers in emerging green industries.

¹ <https://www.ipr.northwestern.edu/news/2020/redbird-what-drives-native-american-poverty.html#:~:text=29.,income%20of%20%2423%2C000%20a%20year.>

Health Improvements: By decreasing reliance on fossil fuels, this project contributes to cleaner air and water, leading to improved public health outcomes. This is particularly significant for low-income and disadvantaged communities that often bear the brunt of environmental pollution.

Community Ownership and Control: As a project in which the Tribe maintains ownership, decisions regarding project operation and benefits remain within the Tribal community's hands. This fosters a sense of pride, autonomy, and self-determination among Tribal members.

Partnerships and Collaboration: A project of this significance requires collaboration with various stakeholders, including government agencies, academic institutions, and private companies. By fostering partnerships, the Tribe can leverage additional resources and expertise to maximize the project's impact and sustainability.

Overall, the biofuels projects proposed serve as a catalyst for positive change, addressing economic, social, and environmental challenges while empowering the Tribal community to build a more resilient and sustainable future.

b. Community Engagement

Tribal Stakeholder Engagement:

The Tribe has held community engagement events with their General Membership. At the December 2023 General Membership meeting, the Tribal membership was surveyed on their climate priorities. This survey reflects there is an overwhelming mandate for clean energy job creation, developing programs to mitigate forest slash and decrease wildfires and developing more access to and encouraging use of alternative energy. Tribal culture has traditionally focused on good stewardship of our natural resources and Habematolel, through the results of the survey, feels a strong responsibility for mitigating the effects of climate change.

5. JOB QUALITY

The Projects, focused on the construction and operation of RTP-20 biofuel production facilities, embodies a dual commitment to environmental sustainability and the creation of high-quality, sustainable jobs. Throughout Tribal history, the Tribe maintains the goal of supporting future generations and acting as responsible stewards of our natural resources. The Tribe understands the need to hire from and lift up disadvantaged communities. Our commitment to this process is informed by the Department of Labor's 8 Good Jobs Principles and in general, High Roads labor standards, which serve as a foundation for our hiring and management practices. By investing in our workforce, we invest in the superior quality of our RFO products and the success of the Projects.

While the Tribe understands and accepts the challenges with building facilities on the edge of somewhat remote forest areas, we believe that these principles (with the guidance and assistance of our strategic partners) will allow us to hire and retain teams that will be dedicated to our mission of protecting the Earth's valuable resources and reducing GHG emissions. Given the Tribe's remote location, we are extremely experienced in staffing businesses and gaining technical support for projects in remote areas. These Principles and Standards guide our actions in ensuring fair compensation, promoting safe and healthy workplaces, fostering inclusive and equitable employment practices, and supporting workers' rights to organize and bargain collectively. The Tribe

in all its endeavors is dedicated to providing career advancement opportunities, offering meaningful benefits, ensuring equitable hiring, and engaging with workers and their representatives to continuously improve job quality.

The Tribe is committed to High Road labor standards. As a historically oppressed people and sovereign, we understand firsthand the importance of the High Road labor standards. These core concepts are an integral part of our culture, and we recognize that our employees are the cornerstone of any success. This commitment is reflected in our project plans which include:

- Providing prevailing wages and comprehensive health benefits.
- Offering housing benefits for long-term employees to support the workforce in remote project locations.
- Establishing partnerships with educational institutions like the University of Maine for apprenticeship and training programs, ensuring our workforce is skilled and prepared for the renewable energy sector.
- Ancillary benefits, including childcare, transportation assistance, and housing stipends, tailored to the needs of our local workforce.
- Continuously engaging with our labor or their representatives to ensure their needs are being met and that we are fostering a culture of respect, collaboration and mutual growth.

Initial training for all roles will be provided by engineers from Ensyn Corporation who have been successfully operating RTP facilities in Canada over the past 25+ years. Once operations are established, the Projects will implement continuous education programs to ensure all employees are operating with the most complete and up to date information available to perform their respective job functions. The Tribe is fortunate that our technology partners have been training and successfully retaining a highly skilled workforce in their Canadian RFO plants. The Tribe intends to ensure the Projects follow their expert guidance in hiring and retention practices in our plants.

The Tribe maintains that investing in our workforce directly impacts the quality of our renewable fuel oil product. By fostering a highly skilled, knowledgeable, loyal and motivated workforce, we ensure the operational excellence and environmental sustainability of our RFO facilities. This investment in people translates to a tangible investment in project success and the broader goals of GHG reduction.

Project hiring practices ensure equal opportunities for all, irrespective of race, gender, socioeconomic background, or sexual orientation. We require all contractors and subcontractors to embody these principles, creating a welcoming and inclusive work environment that reflects our project's values.

The Tribe has committed to the continuous improvement of labor practices and workforce engagement. By actively reviewing and enhancing policies, benefits, and training programs at regular intervals, we ensure our team never rests on its laurels.

The project's commitment to creating high-quality jobs in the renewable energy sector is foundational to our mission. Our investment in our workforce is an investment in the future—not just for the Projects, but for the communities we serve and the environment we are dedicated to protecting.

6. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Past Performance

CPRG Planning Grant. The Tribe is in the process of successfully completing all deliverables under the EPA's Climate Pollution Reduction (Planning) Grant. Deliverables to date have included a Quality Assurance Plan Project Plan (already approved by EPA), the Priority Climate Action Plan (PCAP) which has been submitted to EPA and the successful completion of reporting requirements under the grant. In developing the PCAP, the Tribe is also currently developing its Comprehensive Climate Protection Plan as envisioned under the CPRG Planning grant. The Tribe developed its PCAP in consultation with EPA, Lake County and the Tribal community at large.

The Tribe has received and managed multiple EPA grants including:

- EPA Water Pollution Reduction grant
- Indian Environmental General Assistance
- Environmental Information Exchange Network Grant Program

In addition, the Tribe has received and successfully implemented (or are in the process of implementing) other federal funding:

- DOJ Tribal Victim Services grant
- Tribal Broadband Connectivity Program grant
- CARES/ARPA/LATCF funding programs
- DOI Native American Graves Protection and Repatriation Act grant
- DOI Historic Preservation Fund Grants

The Tribe has also received other State, County and local grant funding for other various programs to benefit the Tribe and the surrounding community.

b. Reporting Requirements

The Tribe has successfully met all of the reporting requirements for its grants including millions of dollars in government funding. Tribal administration has a dedicated EPA division, finance department and all activities are overseen by the Tribal Executive Council.

c. Staff Expertise

The Executive Council of the Tribe, in addition to managing Tribal government programs, has years of experience managing multimillion dollar Tribal Enterprises. The Executive Council has unique perspective when it comes to the Tribal community's needs and how environmental programs and business opportunities can impact the Tribe (and our neighbors) for the better.

The Tribe, under the leadership of Daniella Cazares, has a dedicated Tribal Environmental Protection Agency, which monitors and protects the Tribe's precious environmental resources. The Tribe has undertaken programs to reduce solid waste, conserve and protect vital water resources and is

currently working on a project to bring wastewater disposal services to the Tribe's remote and impoverished reservation area.

The Tribe secured rights to the RTP technology for development of the RFO facilities through its direct investment of precious Tribal resources in its strategic partner, Castlerock Green Energy (CGE). In coordination with CGE, the Tribe has participated in the development of the Projects in Maine and Washington. This strategic investment has aligned the Tribe with a team of proven technology leaders, seasoned engineers, finance professionals and successful developer/ operators.

The Tribe's strategic technology partners have designed, built and operated 8 commercial scale RTP facilities that are already delivering significant GHG reduction measures. The proposed facilities, represented by this application, are a culmination of nearly three decades of building, operating and refining the RTP technology. The Tribe's strategic partners hold nearly 40 patents related to the RTP, its products, and the conversion of wood and other biomass to chemicals and fuels.

The Project's Chief Development Officer (CDO) has participated in well over \$1B in successful infrastructure projects. The CDO brings valuable experience from within a large EPC as well as from the owner's perspective, representing a private equity backed renewable fuels company. His over 28 years of industry experience will ensure a successful development process and internal management of the EPC and construction process. The Projects are supported by a team of finance professionals that have a proven track record of successfully and efficiently deploying capital to maximize impact and minimize risk.

Collectively, the team has significant management experience to ensure that all aspects of the business, once the plants are operational including acquisition of feedstock, logistics, plant management, offtake agreements and finance strategy. This team will allow the Projects to:

- Meet and/or exceed the proposed GHG reduction measures.
- Provide ample High Road labor opportunities.
- Increase the tax basis for the local communities; and
- Deliver the RFO to clients in a variety of industries and support their decarbonization goals.

The Team Biographies attachment to this application will provide further detail on the key leaders and stakeholders as part of this application.

7. BUDGET

a. Budget Detail

For applicable detail on the budget see the budget spreadsheet and budget narrative attached to the application titled: "Budgetcalcs_Habematolel Pomo of Upper Lake.xls" and "Budget_Habematolel Pomo of Upper Lake.pdf".

b. Expenditure of Awarded Funds

The Tribe's initiatives are aimed at reducing fleet emissions, managing solid waste, and enhancing energy efficiency while placing a substantial focus on the development of renewable biofuel production facilities. This venture represents a pivotal component of the Tribe's environmental

strategy, leveraging the allocated funds to foster sustainable energy solutions while addressing global climate change challenges.

Fleet Emission Reduction Program: Transitioning the Tribal vehicle fleet to electric and hybrid models and installing necessary infrastructure like charging stations to support this transition.

Solid Waste Management and Reduction: Enhancing recycling and composting facilities, alongside community education on waste reduction practices, aiming to significantly reduce solid waste impact.

Energy Management Solutions: Retrofitting buildings for energy efficiency and integrating renewable energy sources to decrease overall energy consumption and emissions. With the addition of funding allocated towards the construction of renewable biofuel production facilities, the Tribe embarks on a multifaceted approach to sustainability. This comprehensive strategy not only mitigates immediate environmental impacts through fleet emission reduction, waste management, and energy efficiency improvements but also invests in the future of energy production. The biofuel facilities embody the Tribe's vision for a sustainable, low-carbon future, showcasing a commitment to innovation, environmental stewardship, and community well-being. Through these initiatives, the Tribe sets a precedent for integrating traditional environmental values with modern technological solutions to address the pressing challenges of climate change.

RFO Production Facilities: The renewable biofuel production facilities, central to the Tribe's sustainable energy initiatives, aim to convert biomass into clean, renewable fuel. This process not only provides an alternative to fossil fuels but also utilizes waste materials that would otherwise contribute to landfill mass.

Expenditure of Funds: The Tribe's approach to the expenditure of funds for their outlined climate reduction efforts is relatively simple. The Tribe has aligned the incentives of key stakeholders and has provided a plan as part of this application on the oversight of the construction of renewable biofuel production facilities. The Tribe will prioritize the expenditure of funds for the reduction of GHG reduction on Tribal Land while deploying adequate resources or the development of RFO Production Facilities.

The strategic expenditure of awarded funds reflects the Tribe's commitment to addressing a broad spectrum of environmental concerns:

c. Reasonableness of Costs

The costs of the Tribe's GHG reduction plans contained in this application are supported by a great deal of expertise predicting project costs. The application amount of nearly \$60 million is the total amount needed to implement the entire program, inclusive of the construction of two RTP-20 facilities. The Tribe, through its strategic partners, has secured commitments for the remainder of the funding required to construct these facilities. This application possesses all the critical components required to succeed: (1) clearly stated GHG goals; (2) technology rights; (3) technology expertise; (4) approved feedstock plans and (5) identified and cultivated offtake markets.