



Our Culture Unites us; Our Land Sustains us; Our People are Prosperous

Ahtna, Inc.

R10-22-A-013

Ahtna Region Brownfields Assessment Grant 2021

Narrative Information Sheet

1. Applicant Identification Provide the name and full address of the entity applying for funds.
Ahtna, Inc., P.O. Box 649, Glennallen, Alaska 99588
2. Funding Requested.
 - a. Assessment Grant Type: This project proposal is for a “Community-wide Assessment Grant for States and Tribes.”
 - b. Federal Funds Requested: \$2,000,000
3. Location. (See project area map in the narrative file page 3)
This project will assess priority sites in the Ahtna Region grouped into target areas based on our inventory of gravel pits and priority sites identified by our Villages. The three target areas are 1. The Parks/Denali Highway Area; 2. The Glennallen Area; and 3. The Tok Cutoff Area. There are no incorporated cities in the Ahtna Region. There are two Boroughs organized under the Alaska constitution that priority sites are located in. These are the Denali Borough and the Matanuska-Susitna Borough. The remainder of the sites are in the Copper River Census Area of the unorganized borough that is set up in the Alaska constitution. Unincorporated communities in the project area that will benefit from the project are Cantwell, Mentasta, Slana, Chistochina, Gakona, Gulkana, Glennallen, Tazlina, Copper Center, Willow Lake, Kenny Lake, Tonsina, Chitina, and Strelna. The overall region is the Ahtna Region defined in the Alaska Native Claims Settlement Act. Federally Recognized Tribes served in the project area are the Native Village of Cantwell, Mentasta Traditional Council, Cheesh-Na Tribe (formerly the Native Village of Chistochina), Native Village of Gakona, Gulkana Village, Native Village of Tazlina, Native Village of Kluti Kaah (aka Copper Center) and the Native Village of Chitina. See attached map.
4. Target Area and Priority Site/Property Information.
This “Community-wide Assessment Grant for States and Tribes” will assess priority sites in the Ahtna Region grouped into three target areas based on the Ahtna Land Department internal inventory of sites and priority sites identified by our Villages.



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The three target areas and priority sites discussed in the narrative follow:

Target Area	Priority Site	Address
Parks-Denali Highway Area	Middle Fork Site	194.3 Mile Parks Highway
Parks-Denali Highway Area	Jack River Pit-Cemetery	209.3 Mile Parks Highway
Parks-Denali Highway Area	Old Denali Pit	210.6 Mile Parks Highway
Glennallen Area	Rock Creek Pit	86.2 Mile Richardson Highway
Glennallen Area	Willow Mountain Pit	88.5 Mile Richardson Highway
Glennallen Area	Copper Center Airport Pit	100 Mile Richardson Highway
Glennallen Area	Tazlina Old Laundromat	104.25 Mile Richardson Highway
Glennallen Area	Tazlina Gravel Pit Site	110 Mile Richardson Highway
Glennallen Area	Sailors Pit	129.5 Mile Richardson Highway
Glennallen Area	Fishers Pit	182 Mile Glenn Highway
Glennallen Area	Kotsina River Pit	1.6 Mile McCarthy Road
Tok Cutoff Area	8 Mile Pit	8 Mile Tok Cutoff
Tok Cutoff Area	HAARP Pit	13.3 Mile Tok Cutoff
Tok Cutoff Area	49 Mile Quarry	49.2 Mile Tok Cutoff
Tok Cutoff Area	Mable Creek	76.5 Mile Tok Cutoff

5. Contacts

- a. Project Director: John Leonhart, Lands and Resource Manager, Ahtna, Inc., P.O. Box 649 Glennallen, AK 99588, 907-822-3476, jleonhart@ahtna.net.
- b. Chief Executive/Highest Ranking Executive: Michelle Anderson, President, Ahtna, Inc., 110 West 38th Avenue, Anchorage, AK 99503, 907-868-8250. info@ahtna.net

6. Population and Demographics of the areas served are as follows.¹

Area	Population	AI/AN+Mixed	Household Income	Poverty Rate	HS Diploma	Bachelor's Degree
Ahtna Region	2,376	950	\$58,681	11.8%	94%	29.1%
Chitina	61	35	0	26.2%	53%	0%
Copper Center (Includes Kluti-Kaah)	318	154	\$68,438	11%	95%	20%
Tazlina	376	125	\$79,063	13%	93%	26%
Gulkana	106	75	\$40,833	5.7%	91%	9%

¹ Citation: U.S. Census Bureau (2019). American Community Survey 5-year estimates. Retrieved from <https://www.census.gov/tribal/?aianihh=2430> for the Ahtna Region and the Ahtna Villages Tribal census designated areas. Glennallen was retrieved from the Alaska Department of Labor 2020 redistricting census data by census designated place.



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Gakona	111	47	0	41.1%	100%	40%
Chistochina (includes Cheesh'na)	80	62	\$53,750	17.5%	94%	3%
Mentasta	246	246	0	26%	84%	8%
Cantwell	178	37	\$58,750	10.1%	97%	23%
Glennallen CDP	439	110	\$70,781	2.2%	100%	59%

7. Other Factors Table (page numbers referred to in the Narrative Attachment)

Factor	Page #
Community population is 10,000 or less.	All 1
The priority site(s) is impacted by mine-scarred land	All 2
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).	4 (Kotsina River Pit)
The priority site(s) is in a federally designated flood plain.	4 (Kotsina)
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4 (Willow Mountain)
The reuse of the priority site(s) will incorporate energy efficiency measures.	5
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.	Page 10 note 7.
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	Page 7 Cantwell.

8. Letter from the State or Tribal Environmental Authority

See attached letters from the State of Alaska Department of Environmental Conservation, and tribal environmental authorities Copper River Native Association, Native Village of Kluti-Kaah, Tazlina Village Council, Gulkana Village Council.



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

555 Cordova Street
3rd floor
Anchorage, AK 99501
Main: 907-269-2021
Fax: 907-269-7687
www.dec.alaska.gov

November 23, 2021

ELECTRONIC MAIL ONLY

Joe Bovee, Vice President Lands and Resources
Ahtna, Inc.
P.O. Box 649
Glennallen, AK 99588

Re: State Environmental Authority Letter

Dear Mr. Bovee,

This letter acknowledges that Ahtna, Inc. notified the Alaska Department of Environmental Conservation (DEC), the designated State Environmental Authority, that Ahtna, Inc. is submitting a FY22 Brownfields Areawide Assessment Grant application to the United States Environmental Protection Agency (EPA).

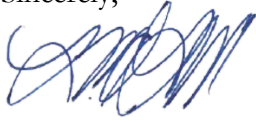
DEC Brownfields is committed to assisting Alaska communities in their efforts to address brownfield properties. We believe the proposal to be a positive and necessary step in addressing very important issues within the Ahtna region. We are aware that Ahtna, Inc. is planning to conduct assessment on multiple sites within their region.

DEC has worked with Ahtna, Inc. on several projects including most recently with the assessment of the "Heinz Site" (ADEC HAZ ID 26718) in conjunction with the Native Village of Gakona starting in 2018 and are currently working with Ahtna Inc. on completing further assessment of the Heinz Site through DEC's Brownfield Assessment and Cleanup (DBAC) program.

This letter establishes Ahtna, Inc.'s compliance with the notification requirements of Threshold Criterion for EPA Brownfield Competitive Grants. We wish Ahtna, Inc. well on both their pursuit of EPA assistance, and success in addressing priority brownfields sites in the Ahtna region.

Please contact me directly if we can be of any further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lisa Griswold', with a stylized flourish at the end.

Lisa Griswold
Environmental Program Specialist
(907) 269-2021
555 Cordova Street
Anchorage, AK 99501
Lisa.griswold@alaska.gov

Electronic cc: Bruce Cain, Ahtna, Inc.
Marc Thomas, ADEC

1. PROJECT AREA DESCRIPTION, PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area (See Map Page 3)

The Ahtna Region is one of 12 Alaska Native Regions created by the Alaska Native Claims Settlement Act (ANCSA). It is the smallest ANCSA region and located in south-central Alaska. The Ahtna Region includes eight federally recognized tribes, one Alaska Native Village Corporation, nine community associations, three school districts, four electric utility companies, various non-profit and for-profit organizations, two national park units and various State and Federal land ownership patterns within 28,581 square miles roughly the size of the state of Ohio. Ahtna region tribes are Cantwell, Cheesh’na (Chistochina), Chitina, Kluti-Kaah (Copper Center), Gakona, Gulkana, Mentasta, and Tazlina.

This project will assess priority sites in the Ahtna Region grouped into target areas based on our inventory of gravel pits and priority sites identified by our Villages. The three target areas are 1. The Parks/Denali Highway Area; 2. The Glennallen Area; and 3. The Tok Cutoff Area. These are sites that have potential for economic development, greenways, parks, recreation, subsistence hunting and gathering areas and an intertie site for a future wind turbine.

There are no incorporated cities in the Ahtna Region. Community associations that will benefit are Cantwell, Mentasta, Slana, Chistochina, Gakona, Gulkana, Glennallen, Tazlina, Copper Center, Willow Lake, Kenny Lake, Tonsina, Chitina, and Strelina.

Demographics of the Ahtna Region, tribal census areas and the Glennallen Census area follow. All the communities in the Ahtna region are small population. The total population for the Ahtna Region is 2,376. Less than .1 people per square mile. The poverty rate is higher than the national average in Chitina, Gakona Chistochina and Mentasta. Median household Income (MHI) is 90% of the national average in the Ahtna Region as a whole. Ahtna villages with MHI below national average are Chitina, Gulkana, Chistochina and Cantwell. Also of note, our more remote villages have low education attainment which reduces opportunity and increases need for redevelopment that supports education.¹

Area	Population	/AN+Mixed	Median Household Income	Poverty Rate	HS Diploma	Bachelor’s Degree
Ahtna Region	2,376	950	\$58,681	11.8%	94%	29.1%
Chitina	61	35	0	26.2%	53%	0%
Copper Center	318	154	\$68,438	11%	95%	20%
Tazlina	376	125	\$79,063	13%	93%	26%
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ii. Description of the Priority Brownfield Site(s)

This project will assess priority sites in the Ahtna Region grouped into three target areas based on the Ahtna Land Department internal inventory and priority sites identified by our Villages.

Criteria was informally used to prioritize the sites as follows.

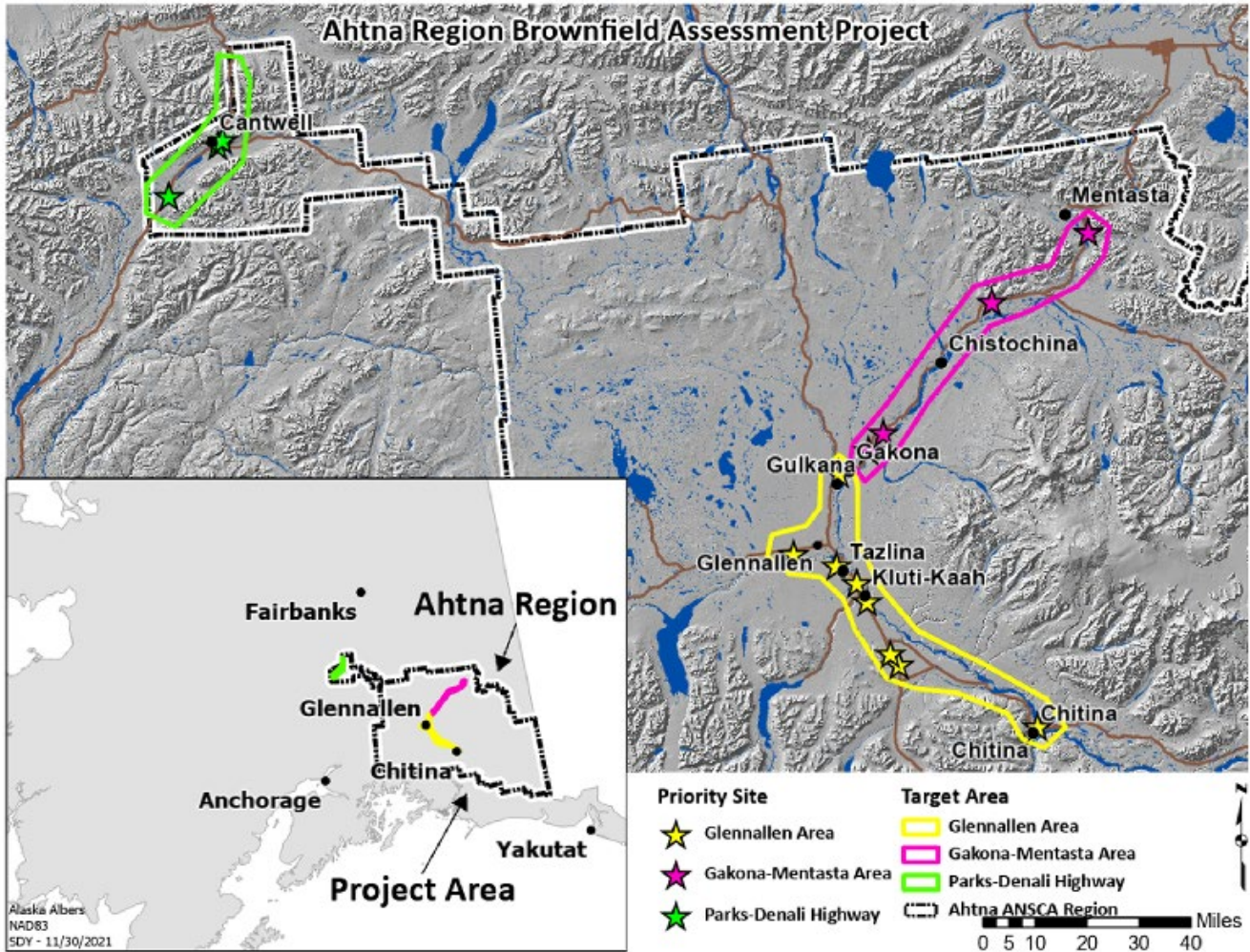
- Protect Human Health and the environment.
- Promote economic development or use for parks, greenways, and similar recreation.
- Use for Customary and Traditional hunting, fishing, and gathering activities.
- Presence of hazardous substances and petroleum.
- No viable responsible party, current and immediate past owner not responsible for contamination.
- All but one site is considered mine-scarred land.

We affirm that these sites are a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

The three target areas and priority sites are listed as follows. All sites are owned by Ahtna, Inc.

Target Area	Priority Site	Adjacent Village/Tribe/Community
Parks-Denali Highway Area	Middle Fork Site	Cantwell
Parks-Denali Highway Area	Jack River Pit-Cemetery	Cantwell
Parks-Denali Highway Area	Old Denali Pit	Cantwell
Glennallen Area	Rock Creek Pit	Copper Center (Kluti-Kaah)
Glennallen Area	Willow Mountain Pit	Copper Center (Kluti-Kaah)
Glennallen Area	Copper Center Airport Pit	Copper Center (Kluti-Kaah)
Glennallen Area	Tazlina Old Laundromat Site	Kluti-Kaah, Tazlina
Glennallen Area	Tazlina Gravel Pit Site	Tazlina
Glennallen Area	Sailors Pit	Gulkana
Glennallen Area	Fishers Pit	Glennallen
Glennallen Area	Kotsina River Pit	Chitina
Tok Cutoff Area	8 Mile Pit	Gakona
Tok Cutoff Area	HAARP Pit	Gakona/Chistochina
Tok Cutoff Area	49 Mile Quarry	Chistochina/Cheesh'na
Tok Cutoff Area	Mable Creek	Mentasta

Figure 1. Location of Target Areas, Priority Sites in relation to Ahtna Region and Ahtna Villages.



A clear description of the priority sites and why identified is as follows:

Priority Site	Selected by	Hwy Mile Post	State Coordinates or Long/Lat	Concerns/Opportunities
Middle Fork Site	Ahtna	194.3 Mile Parks Hwy.	FM T19SR9W S22	Health & Environment, Economic Development, Parks, Greenways, Hunting/fishing/gathering
Jack River Pit-Cemetery	Ahtna	209.3 Mile Parks Hwy.	SOA MS 35-4-006-2	Health & Environment, Economic Development, Parks, Greenways, Hunting/fishing/gathering
Old Denali Pit	Ahtna	210.6 Mile Parks Hwy.	SOA MS 52-2-041-2 (52-2-054-2)	Health & Environment, Economic Development, Parks, Greenways, Hunting/fishing/gathering, Hazardous substances
Rock Creek Pit	Ahtna	86.2 Mile Richardson	CRM T1S R1E S23	Health & Environment, Economic Development, Parks, Greenways,

				Hunting/fishing/gathering, Hazardous substances
Willow Mountain Pit	Ahtna	88.5 Mile Richardson	CRM T1S R1E S10	Health & Environment, Greenways, Hazardous substances, <u>Reuse as intertie for future wind turbine project</u>
Copper Center Airport Pit	Ahtna and CRNA/IGAPs	100 Mile Richardson	61.940130N 145.294227W	Health & Environment, Economic Development, Parks, Greenways, Gathering, Hazardous substances
Tazlina Old Laundromat Site	CRNA/IGAPs	104.25 Mile Richardson	61 59'42.19"N; 145 20'25.29"W	Health & Environment, Economic Development, Parks, Greenways, Moose calf rearing, Hazardous substances
Tazlina Gravel Pit Site	CRNA/IGAPs	110 Mile Richardson	62°2'57.65N; 145°26'32.64W	Health & Environment, Economic Development, Parks, Greenways, Gathering, Hazardous substances
Sailors Pit	Ahtna	129.5 Mile Richardson	CRM T6N R1W S14	Health & Environment, Economic Development, Parks, Greenways, Recreation, Fishing/gathering, Hazardous substances
Fishers Pit	Ahtna	182 Mile Richardson	CRM T4N R3W S25	Health & Environment, Economic Development, Parks, Greenways, Hunting/gathering, Hazardous substances
Kotsina River Pit	Ahtna	1.6 Mile McCarthy Road	CRM T4S R6E S13	Health & Environment, Economic Development, Recreation, Hunting/fishing, <u>Hazardous substances, in flood plain, adjacent to water body</u>
8 Mile Pit	Ahtna	8 Mile Tok Cutoff	CRM T7N R1E S36	Health & Environment, Economic Development, Parks, Greenways, Hunting/gathering
HAARP Pit	Ahtna	13.3 Mile Tok Cutoff	CRM T7N R2E S8	Health & Environment, Economic Development, Parks, Greenways, Hunting/gathering
49 Mile Quarry	Ahtna	49.2 Mile Tok Cutoff	CRM T11N R6E S20 & S29	Health & Environment, Economic Development, Parks, Greenways, Hunting/gathering, Hazardous substances
Mable Creek	Ahtna and CRNA/IGAPs	76.5 Mile Tok Cutoff	62.866212N 143.667097W	Health & Environment, Economic Development, Parks, Greenways, Hunting/gathering, Hazardous substances

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Criteria informally used to prioritize the sites selected initially are as follows.

- Protect Human Health and the environment.
- Promote economic development or enable use as parks, greenways, or recreation.
- Presence of hazardous substances and petroleum.
- Opportunity for Customary and Traditional hunting, fishing, and gathering areas.
- Renewable energy opportunities such as wind.

We will hold initial community outreach meetings in our communities to get input on the best desired reuse of these areas. The project will conduct phase I site assessments on initial areas. With community partners, we will develop plans for further assessment and redevelopment. Based on our knowledge of the communities, many sites will likely be prioritized for greenways or customary and traditional use areas. Other needs will likely be economic development and education. The plans will incorporate energy efficiency, such as using advanced designs and construction techniques to reduce heating, ventilation and lighting energy consumption and replacing equipment with energy-saving devices.

The reuse strategy will align with existing community plans. Plans used to guide this project include the Ahtna comprehensive land use plan, Tribal Stewardship plans for each village and the Copper Valley Economic Development Strategy (CEDS).

The Ahtna Villages are in a process of developing Tribal Stewardship Plans. These plans outline goals for each villages' traditional use area. The proposed project will incorporate these goals.

The CEDS lists the high cost of energy as a significant barrier to economic growth and alternative energy is listed as an opportunity.² There are significant wind resources near the Willow Mountain pit, and this could be a site for an intertie from planned wind turbines.

ii. Outcomes and Benefits of Reuse Strategy

This project will stimulate economic development by engaging the communities in planning for the future. There will be jobs and business opportunities for planning and doing the cleanup work. In addition, long term economic benefits will result from food security from subsistence food. Community facilities such as schools and an intertie to a planned wind project will also create benefits.

The project will create plans using data from the initial site assessments and other information brought out at planning meetings. The Ahtna villages adjacent to many of these sites depend heavily on customary and traditional hunting, fishing, and gathering. When these sites are cleaned up and improved for wildlife habitat and traditional food plants, the traditional economy is improved. Some of the sites may be suitable for community facilities such as schools which can reduce poverty.

The project will serve, and benefit disadvantaged communities. The Ahtna Region is a remote sparsely populated area over 28,000 square miles with only 2,376 people. The Ahtna region population is made up of 40% Alaska Native or mixed-race people according to the US Census Bureau. Some of our tribal areas are 100% Alaska Native or mixed race. All the communities in the Ahtna region are small

² *Comprehensive Economic Development Strategy, Copper River Region, Alaska 2012 Update Prepared by Copper Valley Development Association, Aug 31st, 2012*

population. Most sites selected will benefit our Alaska Native Villages. We have designed the project to include the central commercial hub community of Glennallen which will benefit closely from three of the sites selected. The community of Glennallen although very small serves as a trading center.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

Further funding for planning, assessment, remediation, and reuse will be applied for as projects are identified. Potential funding sources include Alaska DBAC grants, NALEMP, EPA Assessment Grants, Cleanup Grants, and Revolving Loan Fund Grants. These programs require work plans, budgets, and estimated schedules to access. This project will develop useful plans and the communities will be empowered with good data to support such funding applications.

ii. Use of Existing Infrastructure

This project will use existing infrastructure for most of the proposed activities. The sites are old material sites, old dump sites and an old laundromat. These areas will most likely be cleaned up for green space and subsistence hunting and gathering areas. This will use the existing facilities. Development for this type of use is mainly habitat enhancement to encourage production of subsistence food such as moose, caribou, ptarmigan, and traditional use plants.

If additional infrastructure is identified during the planning process, funding sources will be identified and applied for using the plans developed with this project.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

The tribal IGAP Coordinators in the Ahtna region Villages suggested that this application for a Community Wide Assessment Grant for States and Tribes be submitted by Ahtna, Inc. These eight villages are also Federally Recognized Tribes and are listed in the introduction (section 1a.i.). This grant will provide funding to assess and plan for cleanup and reuse on tribal lands that were transferred to Ahtna, Inc. according to terms of the Alaska Native Claims Settlement Act (ANCSA). Many of the tribes in the Ahtna region have well-functioning IGAP programs. However, because of ANCSA, tribes do not have jurisdiction over most of the lands in their areas which makes assessment and planning more complex. This is an opportunity for Ahtna, Inc., and the Ahtna villages to work together to assess and plan for cleanup and reuse of these lands. This meets a big need in our region. The sites chosen were nominated by a process that the Village IGAP coordinators worked with the Regional IGAP coordinator at the Copper River Native Association (CRNA) and submitted sites to Ahtna, Inc. for inclusion in this proposal. In addition, the Ahtna land department went through a list of old material sites and chose areas that have high likelihood of issues that need addressed. Most of the priority sites proposed in this application were federally owned and managed material sites by the Alaska Road Commission (a military branch) prior to 1959. In 1959 (statehood) the sites were transferred through federal grants to the State of Alaska for use in developing and maintaining the federal highways. ANCSA was passed in 1971 and transfer of many of these material sites to Ahtna occurred in the 1980's with no assessment for needed cleanup. These sites are in prime locations for customary and traditional use and can make

wildlife habitat, and hunting/gathering areas if assessed, cleaned up and managed for this use. The result will be improved food security for our villages, improved health from healthy traditional foods and jobs maintaining and managing the property. The Community of Cantwell is near a coal fired power plant that has closed and reopened several times since 2011.

ii. Threats to Sensitive Populations

The data from EJSCREEN for the Ahtna Villages and the community of Glennallen which will be the main communities that benefit from this project follows:

EJ Indexes	Chitina	Copper Center	Tazlina	Gulkana	Gakona	Chistochina	Mentasta	Cantwell	Glennallen
PM 2.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ozone	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Diesel PM	65	66	66	67	67	67	67	64	65
Air Toxics	65	68	67	71	71	71	71	55	66
Respiratory	65	67	66	70	70	70	70	58	65
Traffic	76	76	60	76	76	76	76	54	59
Lead Paint	73	78	71	85	85	85	85	33	49
Superfund	65	67	66	71	71	71	71	54	65
RMP	65	66	65	68	68	68	68	64	65
Hazardous Waste	65	66	65	69	69	69	69	44	65
Wastewater	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Demographic Index	40%	40%	37%	55%	55%	55%	55%	29%	36%
People of color	33%	46%	41%	69%	69%	69%	69%	19%	40%
Low Income	46%	34%	33%	41%	41%	41%	41%	39%	33%
Linguistically Isolated	0%	0%	0%	3%	3%	3%	3%	0%	0%
LT HS Education	13%	5%	5%	7%	7%	7%	7%	1%	5%
Under age 5	1%	8%	7%	4%	4%	4%	4%	3%	7%
Over age 64	36%	8%	7%	14%	14%	14%	14%	6%	7%

1. Health or Welfare of Sensitive Populations.

Our villages have a high percentage of sensitive populations, children, elderly, and pregnant women. The Ahtna Region has a fertility rate of 24.8%, 477% higher than national average. With our culture, elders and families need healthy traditional foods and water free from contaminants. This project will assess and plan for the cleanup and reuse of sites that can potentially be used for green space and moose, caribou and bird habitat and a place to grow traditional plants such as berries and Tsass (Indian potato).

2. Greater Than Normal Incidence of Disease and Adverse Health Conditions

The Ahtna region has a high cancer rate. This project can assess environmental factors for this disease.

3. Promoting Environmental Justice

During WWII some of our villages were taken and used for military dumps. Our people were never able to return. Planes, and trucks brought hazardous material from all over the world and dumped it in our region. Prior to that the world’s largest copper mine polluted the headwaters of the Copper River for

nearly half a century. This project will benefit people who have experienced disproportionate negative environmental consequences from industrial, governmental, and commercial operations.

b. Community Engagement

i. Project Involvement and ii. Project Roles (combined i. and ii.)

The project director and the community outreach coordinator will carry out community engagement tasks. Regional IGAP capacity at CRNA will be accessed to gather input on goals. Direct community outreach will also be used. Business groups will be reached through the local Chamber of Commerce. The following table lists organizations/Entities/Groups and Roles.

Name of Organization	Point of Contact	Specific involvement in the project.
Ahtna, Inc.	Project Director/Community Outreach Manager	Project Management, Community Outreach, procurement, schedule, budget, project compliance and reporting.
Ahtna, Inc.	Management team	Quality, safety, compliance, reporting, finance, accounting, and audit.
Ahtna, Inc.	Wind Energy Team	Review potential site for intertie connection of future Willow Mountain wind project.
Copper River Native Association	Regional IGAP Coordinator	Facilitate participation at regional IGAP coordinator meetings. Facilitate communication to IGAP coordinators. Engage as new priority sites are identified.
Eight Ahtna Villages	Village IGAP Coordinators	Participate in information sharing sessions at regional IGAP coordinator meetings. Share information received at regional IGAP meetings with respective village council. Engage as new priority sites are identified.
Eight Ahtna Villages	Village council members and tribal administrators	Review information shared with the Village. Provide input on reuse priorities, issues, and needs. Participate in planning sessions.
Copper Valley Chamber of Commerce	Board of Directors	Share information with members. Provide comments on issues. Engage as priority sites are identified. Participate in reuse planning.

ii. Project Roles – See above

iii. Incorporating Community Input

See section 2.b.i. above and as follows. Our COVID-19 communication protocol will follow recommended guidelines. All Ahtna villages have email, telephone, and US mail. We can host online meetings if needed on a limited basis. Other methods of communication will be developed as needed.

3. TASK DESCRIPTIONS, COST ESTIMATES, MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Ahtna anticipates four main tasks to be performed.

1. Community Outreach, Reuse Planning, Project Coordination and Management Years 1-4
2. Phase I Environmental Site Assessments (ESA) Years 1-2
3. Phase II ESAs Years 2-3
4. Reuse and Revitalization Plan and Final Report Years 3-4

Community Outreach, Reuse Planning, Project Coordination and Management will include coordinating community involvement efforts, developing a detailed schedule for project execution, and tracking progress of project tasks and costs. Coordination of community involvement is anticipated to consist of hosting a series of meetings in select communities in each of three target areas. The meetings will be held to gather information, encourage local interest, and solicit ideas for prioritization of efforts and reuse/revitalization of the potential Brownfields sites. Information gathered during the community meetings will be used to inform the development of a plan for conducting Phase I Environmental Site Assessments (ESA) at the priority sites and sites identified during the meetings.

Phase I ESA will include the performance of assessments at up to 15 priority sites and 5 additional sites identified during the community involvement meetings. Phase I ESAs will be performed following the ASTM E1527 standard by qualified environmental professionals. Some additional effort to obtain historical property information is anticipated due to the remote location of the sites and the complicated land ownership resulting from ANCSA. Phase I ESA reports will be generated for up to 20 sites.

Phase II ESA will be conducted at up to 10 sites where Phase I ESAs were conducted. Phase II ESAs will be performed by qualified environmental professionals and specific required subcontractors, such as drillers. Community engagement will be conducted to identify priorities for the Phase II ESAs based on degree of impacts, potential reuse/revitalization opportunities, and possible alternate redevelopment funding sources. Phase II ESAs will be performed consistent with ASTM E14903 but may be modified based on the potential for the applicability of specific regulatory requirements under State of Alaska, CERCLA, RCRA, and/or TSCA. The Phase II ESAs will result in an understanding of the presence of substances at the site to determine qualifications for potential future Brownfields remediation grants. The Phase II ESA reports are anticipated to include recommendations for future investigation activities.

Reuse and Revitalization Plan will gather information gained from the ESAs and Community Involvement to develop a comprehensive reuse and revitalization plan for each of the sites assessed. The draft plan will include a prioritization of sites based on the level of effort and estimated costs to restore the sites for the identified beneficial reuse. The draft plan will be presented to communities in the Ahtna region and other stakeholders to obtain comments. A final plan will be prepared that considers comments received. The final plan will be the basis for future remediation, reuse/revitalization effort.

b. Cost Estimates

The table below presents cost estimates for the project.

Budget Categories	Outreach and Reuse Planning	Phase I Site Assessments	Phase II Site Assessments	Reuse Plan and Final Report	Project Total
Personnel (Note 1)	\$31,353	\$7,838	\$7,838	\$31,353	\$78,382
Fringe (Note 2)	\$11,287	\$2,822	\$2,822	\$11,287	\$28,218
Travel (Note 3)	\$7,117	\$8,570	\$11,428	\$4,285	\$31,400
Equipment	\$-0-	\$-0-	\$-0-	\$-0-	\$-0-
Supplies (Note 4)	\$1,800	\$3,600	\$4,800	\$1,800	\$12,000
Contractual (Note 5)	\$300,000	\$100,000	\$1,250,000	\$100,000	\$1,750,000
Other	\$-0-	\$-0-	\$-0-	\$-0-	\$-0-
Total Direct	\$351,557	\$122,830	\$1,276,888	\$148,725	\$1,900,000
Indirect (Note 6)	\$18,503	\$6,465	\$67,204	\$7,828	\$100,000
Total Budget(Note 7)	<u>\$370,060</u>	<u>\$129,295</u>	<u>\$1,344,092</u>	<u>\$156,553</u>	<u>\$2,000,000</u>

Narrative Note 1. Personnel. Project Manager \$96,909/FTE - .05FTE 4 years=\$19,382. Project Outreach Coordinator \$59,000/FTE .25 FTE 4 years=\$59,000. Total \$78,382.

Narrative Note 2. Fringe is 36% of personnel cost and includes FICA, ESC, Workman's Comp, Retirement, Health Insurance, annual and sick leave.

Narrative Note 3. Travel Project local mileage in POV for outreach meetings and site assessment monitoring. 8,697 miles per year 4 years@ federal rate of \$0.56/mile = \$19,481. Lodging and M&I for in region meetings and site assessment monitoring \$284 per night, 8 nights per year 4 years @ federal rate = \$9,088. Lodging and M&I for Anchorage meeting for presentation and agency review \$354 per night, 2 nights per year 4 years = \$2,832. Total Travel \$31,400.

Narrative Note 4 Supplies. \$250 per month 48 months = \$12,000.

Narrative Note 5 Contractual estimated by internal cost estimator for projects of this nature. Phase 1 site assessments 15@\$5,000 = \$75,000, 5 additional @\$5,000 = \$25,000, Community Planning meetings year 1 = \$50,000, write planning documents year 1 = \$25,000, Regulatory interface and planning \$25,000, Summary report of all site assessment work year 1 = \$100,000, Community planning meetings year 2 and 3 = \$50,000, Phase 2 site assessments years 2 and 3, 10@ \$125,000 = \$1,250,000, Develop summary prioritization report from site assessments years 3 and 4 = \$50,000, Develop reuse and revitalization plan for top priority sites years 3 and 4 = \$50,000, Community involvement meetings in year 4 = \$50,000. Total Consulting = \$1,750,000.

Narrative Note 6 Indirect. 10% de minimis subject to 5% of total federal cost statutory administrative cap. No administrative costs are directly charged to this project. No subawards are planned in this project as defined in 2 CFR part 200A§ 200.1.

Narrative Note 7 Total budgeted on reuse planning is 26.3%. This may go over 30% depending on the final work plan negotiated if awarded.

c. Measuring Environmental Results

Measurement of environmental results will be conducted through active management of the defined scope and adherence to the project schedule and cost. The measurement and tracking of the grant project will be performed by the Program Director under Task 1 for comparison with the project schedule and budget. Progress on coordination and community involvement will be managed by developing agenda for meetings, preparing meeting minutes, and completion of plans. Phase I and Phase II ESAs will be tracked through monitoring of field activities and the reporting deliverables. Tracking of the reuse/revitalization plan will be through completion of documents and receipt of community feedback. We plan to conduct community planning throughout the project. These planning forums will also be used to report project results. Ahtna will participate in community meetings and regional IGAP meetings to report progress and receive feedback. A final report will document the project accomplishments and define the plan to move forward after the project is completed.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational capacity

Ahtna is a well-established Alaska Native Regional Corporation with a broad depth of technical and administrative capabilities. The Ahtna heritage is rooted deeply with our 28,000 square mile traditional

use territory and the ongoing protection of over 1.5 million acres of settlement land encompassing forests, rivers, wildlife, cultural sites, and sensitive habitats.

Our environmental experience spans a wide range of services from environmental site assessments to implementation of remediation technologies and regulatory closure of sites to utilizing the latest mapping and imaging technology for complex data analyses and monitoring.

ii. Organizational structure

The Project manager will provide overall project management and oversight as well as lead the community outreach efforts. The Community outreach coordinator will support community outreach meetings, logistics, and information storage. Subcontractors will perform assessment work and assist with drafting plans and reports and will be supervised by the project manager with the assistance of Ahtna subject matter experts. The Ahtna management team will assure safety, quality, compliance, finance, accounting, and audit.

iii. Description of key staff

Project Manager will be John Leonhart. Mr. Leonhart has 15 years of experience working on environmental planning, assessment, cleanup, and reuse projects. Mr. Leonhart has a master's degree in biological sciences and is well suited for the project. Field assessments Phase I/II Assessment and planning documents will be supported by Ahtna subsidiary staff Cody Black. Mr. Black has 27 years experience in environmental engineering and operations in remote Alaska settings. He has a bachelor's degree in civil and Environmental Engineering and is a licensed Civil and Environmental PE. Quality, safety, grant compliance, finance and accounting will be led by Bruce Cain, CPA. Mr. Cain has 30 years experience in federal grant administration for Tribes, holds a master's degree in rural development and is a Certified Public Accountant. All project team members will support community outreach.

iv. Acquiring additional resources

Ahtna has a broad array of additional resources within its staff and management team. We have experienced engineers, environmental scientists, biologists, administrators, and traditional leaders available to the project. We have a large network of professionals, and we have traditional knowledge and ties to our villages. These contacts and experience assure access to additional resources as needed.

b. Past Performance and Accomplishments

i. Currently has or previously received an EPA Brownfields Grant

Not Applicable.

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal Agreements

Ahtna has not received an EPA Brownfields Grant but has received other Federal agreements.

According to the RFA below are relevant recent agreements to demonstrate capability:

1. Ogliuga Island FUDS Remedial Investigation, Ogliuga Island, Alaska [2018-2022]

- **Federal Agreement:** Ahtna Engineering Services, LLC (AES) - United States Army Corps of Engineers (USACE); Contracts W911KB-17-D-0019, W911KB18F0119, and W911KB21C0023

- **Award Amount:** \$8,973,336

- **Scope and Purpose:** Perform a Formerly Used Defense Site (FUDS) Historical Property Information Evaluation (HPIE) and historical geospatial analysis at the site. Ahtna performed a Phase II Remedial Investigation (RI), Phase III RI, and risk assessment at the Ogliuga Island FUDS. The HPIE identified 200 features including 189 features designated for further investigation in Phase II RI.

- **Accomplishments:** Ahtna successfully developed planning documents, managed logistics, completed assessment and investigation activities, and provided reports for the projects. Ahtna achieved project objectives of environmental assessment and investigation within the contract budget and schedule requirements. The client was updated on project progress routinely throughout execution.
2. National Oceanic and Atmospheric Administration (NOAA)/National Weather Service Phase II Site Assessment, Demolition, Remedial Action, and Site Investigation, Barrow, Alaska [2017-2019]
- **Federal Agreement:** AES – NOAA; Contract AB-133W-15-CQ-0058-T0003
 - **Award Amount:** \$1,756,333
 - **Scope and Purpose:** Conducted a Phase II Environmental Site Assessment (ESA) of the 5.7-acre property located in the Arctic with five former houses, six former work structures, and supporting infrastructure. The site had been utilized by NWS staff for 60 years. The Phase II ESA was conducted to determine if contaminants of potential concern including lead, polychlorinated biphenyls (PCBs), and petroleum products, were present in the soil and building materials at the site. Once identified, Ahtna performed the removal of various waste streams in accordance with regulatory requirements.
 - **Accomplishments:** Ahtna identified Resource Conservation and Recovery Act (RCRA) hazardous waste, Toxics Substance Control Act (TSCA) waste, and non-hazardous waste lead and petroleum impacted soils at the site. Ahtna achieved project objectives of environmental assessment and cleanup within the contract budget and schedule requirements. The client was updated on the project progress routinely throughout execution of the project.
3. Assessment, Investigation, and Cleanup at United States Coast Guard Property, Attu Island, Alaska [2017-2019]
- **Federal Agreement:** AES – USACE; Contract W911KB-14-0005, DO 0010, Modification #03
 - **Award Amount:** \$768,000
 - **Scope and Purpose:** Perform a preliminary assessment (PA) of 1,800-acres of USCG property on Attu Island for threats to human health or environment through an extensive desktop study using historical site documents and an onsite assessment. Contents of the LORAN Station Attu were inventoried for hazardous materials and subsequently disposed of in accordance with applicable state and federal regulation. A focused environmental site investigation was completed to assess a small-arms firing range and better quantify volumes of petroleum-contaminated soil remaining at the Station that will require future remedial actions.
 - **Accomplishments:** Ahtna successfully developed planning documents; managed logistics; completed the desktop study and onsite PA that identified two former uninvestigated underground storage tanks, polychlorinated biphenyls-containing ballasts, mercury-containing fluorescent light tubes, and crumbling/broken lead-acid batteries. Ahtna conducted the inventory of hazardous materials within the LORAN Station and successfully packaged and shipped materials off site for disposal. Ahtna completed investigation activities at the small-arms firing range to further define the extent of petroleum-contaminated soil. Individual reports were prepared for each aspect of the project. The client was routinely updated on project progress throughout execution. Ahtna achieved the project objectives of environmental assessment, cleanup, and investigation within the contract budget and schedule.

Ahtna, Inc.

EPA Brownfield Assessment Grants RFA No.: EPA-OLEM-OBLR-21-04

Threshold Criteria Responses – ATTACHMENT

1. Statement of Applicant Eligibility:

Ahtna, Incorporated is an Alaska Native Corporation formed on June 23, 1972, pursuant to the Alaska Native Claims Settlement Act. In accordance with the Consolidated Appropriations Act, 2021, Division N, Title IX, Section 905(a)(8), Public Law 116-260, 134 Stat. 1182 (Dec. 27, 2020) (the “Act”), Ahtna, Incorporated is eligible to receive grants under the EPA Brownfield Assessment Grants RFA No.: EPA-OLEM-OBLR-21-04 for a Community-Wide Assessment Grant for States and Tribes.

2. Community Involvement

Ahtna will inform and involve the community and other stakeholders in the planning, implementation, and other brownfield assessment activities described in the application as follows. The project director and the community involvement coordinator use a variety of methods to meaningfully communicate with our villages and communities. We will use the regional IGAP capacity at CRNA to communicate, gather input and advice on project goals and deliverables as the project progresses from the village IGAP coordinators. We will also directly communicate to our communities and village councils and conduct outreach and planning meetings. We will reach out to business groups through Ahtna’s membership and participation in the Copper Valley Chamber of Commerce. The project scope includes community planning meetings throughout the project to insure meaningful participation by all stakeholders. In the event of restrictions due to COVID-19, our communication protocol will follow local, state, and national guidelines. We have electronic capability in all our villages for email. All our villages have telephone and US mail. We can also host online meetings if needed on a limited basis in our villages. Other methods of communication will be developed as needed.

3. Named Contractors and Subrecipients

The applicant has not named contractors or subrecipients in this application. Ahtna will comply with all required procurement regulations.

4. Expenditure of Existing Grant Funds

The applicant affirms it does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

Additional Threshold Criteria for Community-wide Assessment Grants for States and Tribes Only

1. Target areas and priority sites are listed in the Narrative Information Sheet as required in the RFA.