



MENOMINEE INDIAN TRIBE OF WISCONSIN

Community Development Department
W2794 Go-Around Rd.
Keshena, WI 54135

R05-26-A-001

RE: FY2026 EPA Brownfields Community-Wide Assessment Grant for States and Tribes Application

The Menominee Indian Tribe of Wisconsin is pleased to submit this proposal for FY2026 Brownfields Community-Wide Assessment for States and Tribes Grant funding. Below we provide the information requested.

(1) Applicant Identification:

Menominee Indian Tribe of Wisconsin
W2794 Go-Around Road
Keshena, WI 54135

(2) Website URL: <https://menominee-nsn.gov/>

(3) Funding Requested:

- (a) Assessment Grant Type: Community-wide Assessment Grant for States and Tribes.
- (b) Federal Funds Requested: \$2,000,000

(4) Location:

- (a) City: Keshena
- (b) County: Menominee
- (c) State or Reservation: Menominee Reservation located in the State of Wisconsin

(5) Target Area & Priority Site Information:

Target Area Name	Priority Site Address(es)
Keshena	<ul style="list-style-type: none"> • Keshena Resource Center Area (N1163 State Highway 47/55 Keshena, W 54135) • Former Menominee County Highway Site (State Highway 55 (Near Keshena Falls) Keshena, WI 54135)
Neopit	<ul style="list-style-type: none"> • Neopit East Dumpsite (East of County Road M, Adjacent to Wolf River Neopit, WI 54150)
Balsam Row Dam Area	<ul style="list-style-type: none"> • Balsam Row Dam Infrastructure and Adjacent Lands (Balsam Row Road, Wolf River Crossing, Town of Wescott, Shawano County, WI 54166)
Middle Village	<ul style="list-style-type: none"> • Proposed Residential Redevelopment Tracts (Adjacent to N2222, White Cedar Road Gresham, WI 54128) • Middle Village Resource Center and Debris Site (Adjacent to N2222, White Cedar Road Gresham, WI 54128)

(6) Contacts:

(a) Project Director:

Name: Natasha Chevalier

Phone: (715) 799-5157 | Email: Nchevalier@mitw.org

Mailing Address: W2794 Go-Around Road, Keshena, WI 54135



MENOMINEE INDIAN TRIBE OF WISCONSIN

Community Development Department
 W2794 Go-Around Rd.
 Keshena, WI 54135

(b) Chief Executive/Highest Ranking Elected Official:

Name: Joey Awonohopay, Chairman
 Phone: (715)799-5154 | Email:chairman@mitw.org
 Mailing Address: W2794 Go-Around Road, Keshena, WI 54135

(7). Population:

- Population of Target Area: 3,200

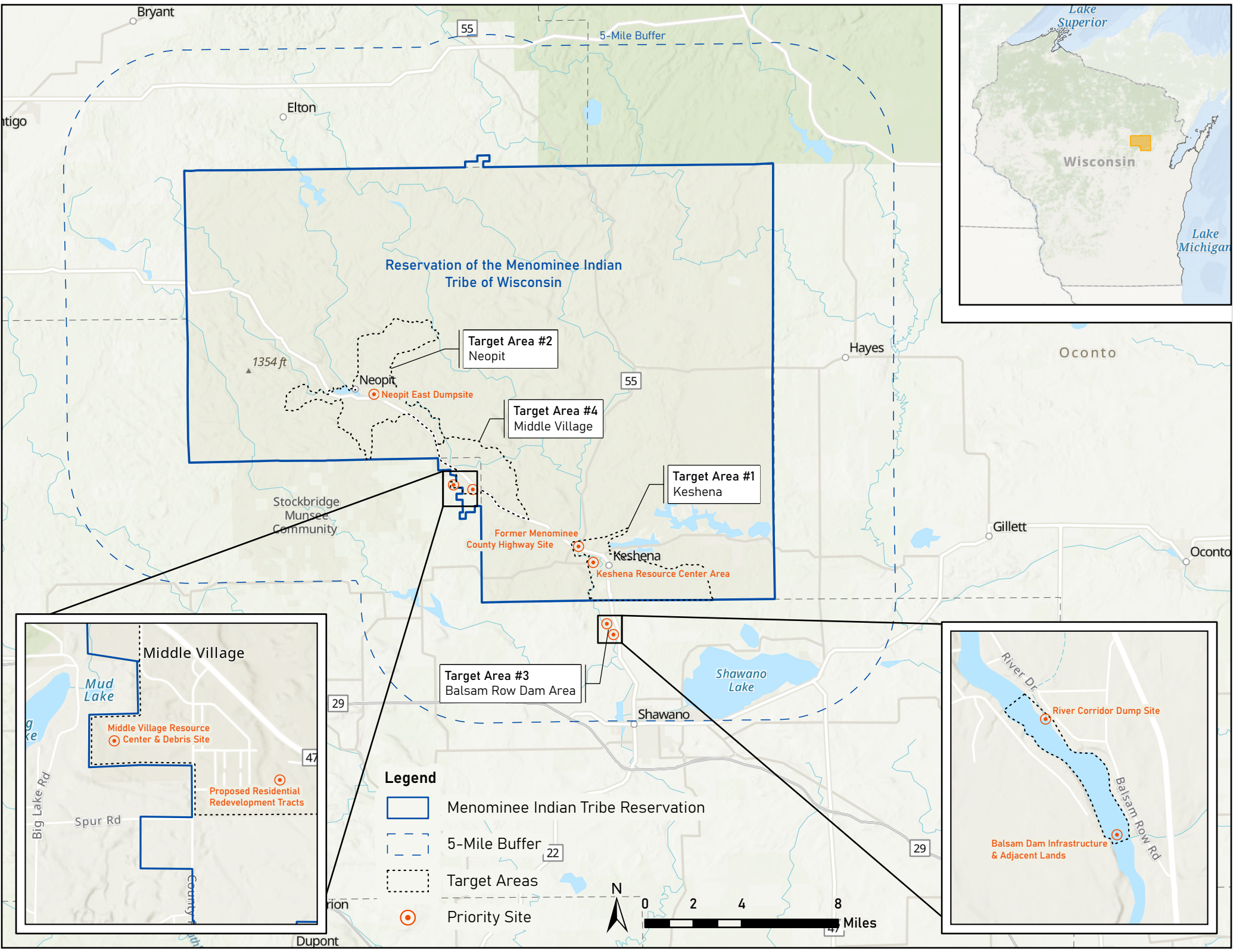
8. Other Factors:

Other Factors Criteria	Page #
Community population is 15,000 or less.	5
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	1, 5
The priority site(s) is impacted by mine-scarred land.	NA
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).	3
The priority site(s) is in a federally designated flood plain.	2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	NA
The reuse of the priority site(s) will incorporate energy efficiency measures.	3, 4, 6, 7
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority sites within the target areas.	NA
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2015 or later) or is closing.	NA

NA = Not applicable

9. Letter from the State or Tribal Environmental Authority: A letter of acknowledgement from the Environmental Services Department of the Menominee Indian Tribe of Wisconsin is attached.

10. Releasing Copies of Applications: The information provided in the application does not need to be redacted prior to release.



Bryant
Elton
Antigo

Reservation of the Menominee Indian Tribe of Wisconsin

Target Area #2
Neopit

Neopit
Neopit East Dumpsite

Target Area #4
Middle Village

Target Area #1
Keshena

Former Menominee County Highway Site

Keshena
Keshena Resource Center Area

Stockbridge Munsee Community

Middle Village

Target Area #3
Balsam Row Dam Area

Shawano Lake

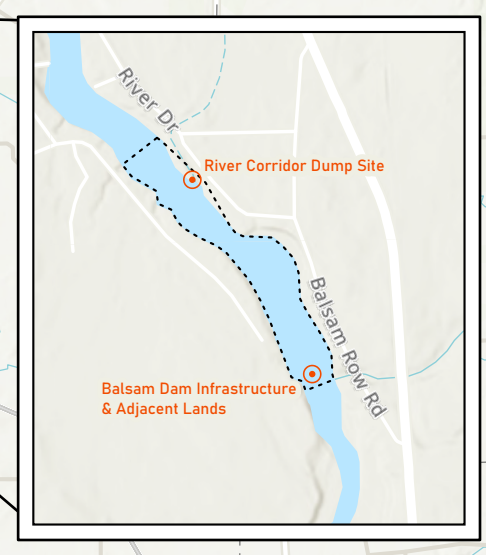
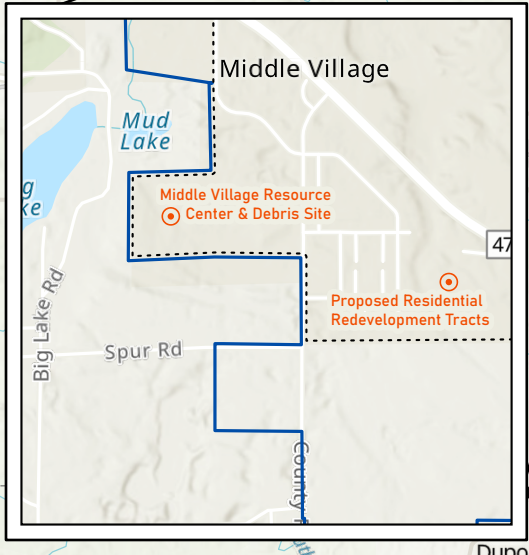
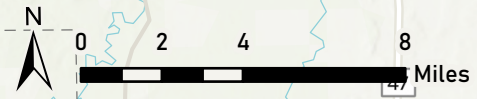
Shawano

River Corridor Dump Site

Balsam Dam Infrastructure & Adjacent Lands

Legend

- Menominee Indian Tribe Reservation
- 5-Mile Buffer
- Target Areas
- Priority Site





MENOMINEE INDIAN TRIBE OF WISCONSIN

Environmental Services Department
PO Box 910
Keshena, WI 54135

January 22, 2026

Natasha Old Elk-Chevalier, Community Development & Utilities Director
W2794 Go-Around Rd.
Keshena, WI 54135
E: Nchevalier@mitw.org
O: (715) 799-5157

RE: Letter of Acknowledgement for MITW's FY2026 EPA Brownfield Community-Wide Assessment Grant for States and Tribes (CWAGST) Application

Dear Natasha,

As the Tribal Environmental Authority for the Menominee Indian Tribe of Wisconsin (MITW), we acknowledge that MITW is applying for a \$2M EPA Brownfield Community-Wide Assessment Grant for States and Tribes (CWAGST) as part of the current Fiscal Year (FY) 2026 grant competition.

In addition to the required acknowledgement, we offer our full support for assisting with implementation of the grant should funding be awarded by the EPA. We understand that EPA Brownfield CWAGST funding will be leveraged by MITW to support environmental assessment and cleanup/reuse planning activities within four priority Target Areas (TAs) in our community, including: Keshena, Middle Village, Neopit and the Balsam Dam area.

We understand the focus will be to update and enhance our brownfields inventory, complete community outreach and stakeholder engagement activities, and conduct multiple Phase I & II Environmental Site Assessments (ESAs) and Regulated Building Materials (RBM) Surveys to evaluate the potential presence of hazardous substances and/or petroleum at priority sites within the TAs. Where contamination is identified, this critical source of funding will allow us to complete an analysis of cleanup alternatives (ABCAs) and conduct cleanup plans necessary to remediate and restore our lands. We understand that funding will also be allocated for site-specific and area-wide restoration/revitalization planning activities in support of our established goals for economic development, housing, public works and infrastructure, and other critical initiatives.

If you have any questions, please give me a call at 715-799-6150.

Sincerely,

A handwritten signature in black ink that reads "Jeremy Pyatskowitz".

Digitally signed by: Jeremy Pyatskowitz
DN: CN = Jeremy Pyatskowitz email =
jpyatskowitz@mitw.org C = US O =
Menominee Indian Tribe of Wisconsin OU
= Environmental Services Department
Date: 2026.01.26 14:02:09 -05'00'

Jeremy Pyatskowitz, Director
MITW-Environmental Services Department
PO Box 910
Keshena, WI 54135

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION:

1.a. Overview of Brownfield Challenges and Description of Target Areas:

General Background and Demographics: The Menominee Indian Tribe of Wisconsin (herein referred to as Tribe and MITW) is a federally recognized Tribe with a reservation comprising approximately 235,000 acres of ancestral homelands in northeastern Wisconsin. The Reservation shares coterminous geopolitical boundaries with Menominee County, the state's poorest and least populous county. The Menominee community faces significant socioeconomic distress that compounds the challenges of brownfield redevelopment. According to U.S. Census data, the poverty rate in Menominee County is consistently double or triple the state average, hovering around 25-30%, with child poverty rates often exceeding 40%. Unemployment remains high due to a lack of industrial diversification; the local economy relies heavily on the timber industry and Tribal government operations. The geographic boundaries for the proposed grant activities focus on the Menominee Reservation.

The Tribe is currently facing a critical housing shortage, exacerbated by aging infrastructure and environmental degradation. Many Tribal members are forced to live in overcrowded or substandard housing due to the lack of buildable, clean land. This grant focuses on three primary target areas where these economic and environmental pressures converge: Middle Village, Keshena, and the Balsam Row Dam Area.

Target Area 1 Keshena: Keshena is the seat of Tribal government and the commercial hub of the Reservation. Unlike the residential focus of Middle Village, Keshena's brownfield challenges are industrial and commercial. This area contains a density of sites related to public works, vehicle maintenance, and historical dumping. As the primary population center, Keshena hosts the Tribe's Resource Center, which has become a focal point for the accumulation of hazardous materials such as waste oils, paints, scrap metals, and white goods. The proximity of these potential contaminants to government offices, schools, and existing residences poses a threat to public health. The area also hosts legacy sites like the former Menominee County Highway site near Keshena Falls, where heavy equipment storage and fuel tanks have left a legacy of potential contamination.

Target Area 2 Neopit: The community of Neopit, located along the **Wolf River**, was historically the industrial heart of the Reservation, centered around the Menominee Tribal Enterprises sawmill. This legacy of heavy industry has left a complex footprint of environmental challenges. Neopit is the primary focus of the Tribe's "Replace Neopit" initiative. The current housing stock is aging and energy-inefficient, located in close proximity to former industrial operations. The target area is bisected by the Wolf River. "Pits and dumps" along this corridor, particularly the large piles at the East Dumpsite, pose a dual threat: they are attractive nuisances where local children are known to play and ride ATVs, and they present a significant risk of contaminant runoff into the river during heavy rains. Despite previous successes, such as the remediation of the local gas station, significant data gaps remain.

Target Area 3 Balsam Row Dam Area (along the Wolf River): The Balsam Row Dam is located approximately 1.5 miles south of the southern border of the Reservation in the Town of Wescott (N6795 Balsam Row Rd). The dam impounds water upstream including on the Menominee Reservation. The Balsam Row Dam is a FERC licensed hydroelectric Project (Project No. 710) owned by Wolf River Hydro LLP. It is a complete barrier to aquatic species reaching the Menominee Reservation. It is a 700kw currently non-operative due to the condition of its generator and gates.

The Tribe's proposed use of the property is to connect approximately 60 miles of the Wolf River and its tributaries from downstream of the Balsam Row Dam to 150 miles of the Wolf River upstream by way of a nature-like fishway or by dam removal, and to help enhance and protect the Menominee's fishery on the Wolf River including at least 10 aquatic species most notably Lake Sturgeon. The Balsam Row Dam (and one other dam located on the Wolf River in the City of Shawano) blocked the return of Lake Sturgeon to their traditional spawning waters at Keshena Falls on the Wolf River on the Menominee Reservation. This was an annual event and place of supreme importance to the Tribe who had celebrated the annual return of Sturgeon to Keshena Falls for centuries before the arrival of Europeans.

This area has been utilized for hydroelectric power generation and rural residential purposes. The infrastructure surrounding the dam, along with adjacent storage lands, faces environmental uncertainty regarding legacy industrial use, specifically potential polychlorinated biphenyls (PCBs) from older electrical transformers and machinery lubricants. Furthermore, the remote nature of the Balsam Row Dam access roads has historically made them targets for unauthorized dumping. Assessing this area is vital not only for potential reuse and housing expansion but also to protect the Wolf River watershed from leaching contaminants.

Target Area 4 Middle Village: Middle Village is designated as a primary growth zone to alleviate housing pressures in the older community of Neopit. The Tribe's strategic plan involves transitioning residents from substandard units in Neopit to new, energy-efficient housing in Middle Village. However, this transition is stalled by potential contamination on available lands. The target area includes former agricultural lands and grazing pastures that have been fallow for

over 30 years. While these lands appear green, they qualify as "agricultural brownfields" due to historical use of persistent pesticides and herbicides. Additionally, some uncontrolled dumping has occurred here, raising concerns about mixed contamination. Eligibility determinations are critical to releasing these lands for safe home construction.

1.b. Description of Priority Brownfield Sites:

Overview of Brownfields in Target Areas: The Tribe has identified a significant inventory of potential brownfield sites across the Middle Village, Keshena, Balsam Row Dam, and Neopit target areas. These sites range from former industrial operations and municipal infrastructure to informal "pits and dumps" identified on historical maps. The sites vary in size from small acreage debris piles to larger 9-acre distinct tracts. Common environmental concerns across these areas include soil and groundwater contamination from volatile organic compounds (VOCs), heavy metals, PCBs, and petroleum products. The Tribe has selected the following priority sites based on their potential for immediate community impact, alignment with housing initiatives, and cultural significance.

Target Area: Keshena

Priority Site 1: Keshena Resource Center Area

Site Condition & History: This is an active recycling and solid waste facility. While the adjacent "Old Keshena Dump" (9 acres) has an engineered cap and is currently in a long-term U.S. Department of Agriculture (USDA) prairie restoration, the active Resource Center area itself requires urgent assessment. It lacks the infrastructure to effectively manage hazardous substances, raising concerns about soil and groundwater contamination from the storage of paints, metals, waste oils, and refrigerators.

Reuse & Prioritization: The priority is to assess the active facility to prevent exposure to VOCs and heavy metals, ensuring the facility does not contaminate the adjacent restored prairie or threaten the health and residents.

Priority Site 2: Former Menominee County Highway Site

Site Condition & History: Located near the *Wolf River*, this site previously housed the highway department. While a tank removal was previously conducted, the site hosted numerous above-ground storage tanks (ASTs) and vehicle maintenance operations. No comprehensive closure records exist, causing concerns of leaks and soil contamination.

Reuse & Prioritization: This site is a high priority for cultural revitalization. The proposed reuse is a community park designed to allow Tribal members to view sturgeon, a species deeply intrinsic to Menominee culture. Investigating and remediating this site is essential to safely reconnect the community to the riverfront.

Target Area: Neopit

Priority Site 3: Neopit East Dumpsite

Site Condition & History: Located east of County Road M, this large historical dumpsite was ostensibly used for sawdust from the mill. However, historical accounts confirm that unidentified waste products were also most likely dumped here. The site contains large piles that have become attractive nuisances; children are known to play on the piles and ride ATVs across the site.

Reuse & Prioritization: The primary driver for prioritization here is human health and safety. The Tribe must characterize the contaminants in these piles to determine the risk to the children using the site for recreation and to prevent runoff into the nearby river.

Target Area: Balsam Row Dam Area (along the Wolf River)

Priority Site 4: Balsam Row Dam Infrastructure & Adjacent Lands

Site Condition & History: This site centers on the land surrounding the hydroelectric facility and access routes. Historical machinery maintenance and transformer storage have created a high potential for contamination from PCBs and heavy petroleum products. The area along the Wolf River is zoned AE and A by FEMA, indicating that this area is in a floodplain.

Reuse & Prioritization: Phase I ESAs are needed to assess specific contaminants. Ensuring the environmental integrity of this area is critical for the protection of the Wolf River's water quality and for future recreational use.

Target Area: Middle Village

Priority Site 5: Proposed Residential Redevelopment Tracts

Site Condition & History: This site consists of old farmland historically used for grazing. While the area has been platted for future development, it remains undeveloped. Crucially, no Phase I or Phase II Environmental Site Assessments (ESAs) have been conducted on this land to rule out residual agricultural contaminants such as pesticides or herbicides.

Reuse & Prioritization: Securing environmental clearance here is the linchpin for the Tribe's "Replace Neopit" housing initiative. The Tribe intends to develop this land for safe, modern housing, but cannot proceed until the soil is confirmed safe for residential use.

Priority Site 6: Middle Village Resource Center & Debris Site

Site Condition & History: This area has served as a disposal ground for public works debris, containing piles of vegetated and non-vegetated materials (concrete, shrubs). There is a concern that unauthorized hazardous materials were historically co-mingled with this debris.

Reuse & Prioritization: Assessment is required to characterize the waste stream and clear the site for safe expansion of community services or remediation to prevent leaching into the surrounding environment.

1.c. Identifying Additional Sites: If grant funds remain after addressing the priority sites, the Tribe will utilize a three-tiered process to identify and assess additional sites. This process formalizes the extensive institutional knowledge held by Tribal staff and ensures community-wide coverage.

- **Inventory Consolidation:** The Tribe will first systematically review and digitize the historical "Menominee Pits and Dumps" map and the remediation site list. These internal documents represent decades of institutional memory regarding unregulated disposal sites that have not yet been formally characterized.
- **Inter-Departmental Referral:** The Environmental Services Department will hold quarterly "Brownfield Roundtable" meetings with the Housing Department, Historic Preservation and other Offices. This ensures that any land targeted for future housing (such as new tracts in the Middle Village area) or cultural preservation is flagged for environmental assessment before development plans stall due to unforeseen contamination.
- **Community Nomination Scheme:** To reach beyond known sites, the Tribe could launch a "Report a Site" initiative. This will allow residents to submit simple nomination forms (available at the Tribal administration building and online) identifying suspected contamination, such as abandoned piles or dumping grounds.

1.d. Reuse Strategy & Alignment with Revitalization Plans: The reuse strategy for each site is described in Section 1.b.

- **Alignment with Housing and Revitalization Plans:** The central pillar of the Tribe's reuse strategy is the "Replace Neopit" Initiative, a comprehensive local government plan to transition residents from aging, energy-inefficient housing in industrial zones to modern, safe subdivisions. The assessment of the Middle Village Priority Sites (specifically the Proposed Residential Redevelopment Tracts) is the direct prerequisite for this initiative. Currently, the lack of environmental clearance on these agricultural lands acts as a moratorium on development. By utilizing this grant to rule out residual contaminants, the Tribe will immediately unlock this land for the construction of new, energy-efficient homes.
- **Alignment with Enhancing Cultural & Recreational Uses:** The Tribe's reuse strategy also prioritizes the reclamation of land for cultural and recreational use, aligning with the community's connection to the Wolf River. The projected reuse for the Former Menominee County Hwy Site is a dedicated Sturgeon Viewing Park. This project addresses a specific community priority: re-establishing a safe, accessible gathering space for Tribal members to observe the annual sturgeon run, a cornerstone of Menominee culture. Similarly, the assessment of the Balsam Row Dam infrastructure and adjacent lands aligns with the Tribe's goal to expand safe recreational access to the river. By confirming these sites are free from PCBs and heavy metals, the Tribe ensures that future generations can use these riverfront areas for fishing and gathering.
- **Alignment with Public Safety Priorities:** The reuse strategy advances the Tribe's "Source Control" and public safety priorities. The Neopit East Dumpsite and the Keshena Resource Center are currently attractive nuisances that pose risks to public health and the adjacent watershed. The reuse strategy for these sites is focused on transforming unregulated dumping grounds into controlled, monitored open spaces that no longer threaten the safety of children (who currently use the Neopit piles for recreation) or the integrity of the adjacent USDA Prairie Restoration.

1.e. Outcomes and Benefits of Reuse Strategy:

- **Stimulating Economic Development & Community Assets:** The primary outcome of this grant will be the removal of environmental barriers that currently stall the Tribe's most critical community development projects. By clearing the Middle Village residential tracts, the Tribe will unlock the land necessary for the "Replace Neopit" initiative, directly stimulating the local economy by creating construction jobs and providing the stable, modern housing workforce retention requires. Furthermore, the reuse strategy explicitly prioritizes the creation of non-profit and recreational assets. The remediation of the Former Menominee County Highway Site will transform a contaminated maintenance yard into a cultural park dedicated to Sturgeon viewing. This not only reclaims riverfront access for the community but also preserves a site of spiritual significance, fulfilling the EPA's goal of facilitating the creation of parkland and recreational property.
- **Improving Local Resilience to Extreme Weather:** The target areas, particularly Neopit and Keshena, are tied to the Wolf River system, making them vulnerable to the increasing frequency of extreme precipitation events and flooding. The area along the Wolf River is zoned AE and A by FEMA, indicating that this area is in a floodplain. However, in September and October 2025, water was drawn down from behind the dam to minimize risk of dam

damage or failure by high-precipitation events. By assessing and subsequently remediating sites like the Neopit East Dumpsite and the Balsam Row Dam corridor, loose debris and soil contaminants are removed that would otherwise be mobilized during flood events.

- **Facilitating Renewable Energy & Efficiency:** This project directly supports the Tribe's commitment to renewable energy and reduced energy burdens. The assessment of the Balsam Row Dam infrastructure is critical to the long-term maintenance and potential expansion of the Tribe's existing hydroelectric generation capabilities, a key source of local renewable power. Furthermore, the planned residential redevelopment in Middle Village will incorporate modern energy efficiency measures. Unlike the aging, energy-intensive housing stock in Neopit, the new units will be constructed to meet or exceed current energy codes. This transition will significantly reduce the energy burden on low-income residents and Tribal elders.
- **Sturgeon Restoration:** Efforts to restore sturgeon continue to be somewhat limited by the presence of dams which prevent upstream spawning runs. The Tribe has spearheaded regional efforts to construct fish ladders and other mechanisms to facilitate successful passage. A major Menominee cultural tradition that Tribal members had not practiced since 1892 when dams were built below the reservation and the sturgeon no longer returned to Tribal lands. In the late 1990s, Wisconsin Department of Natural Resources gave the Tribe sturgeon in order to perform the ceremony below Keshena Falls at the mouth of Chikeney Creek on Tribal lands. Since that time the state has continued to supply the Tribe with sturgeon. Acquisition and removal are likely a multi-million-dollar project. The Tribe intends to raise funds from non-profits interested in dam removal and support of Tribes for this purpose. As the dam is FERC licensed, any plan to decommission and remove it requires FERC approval and implicates NEPA. It is likely that an environmental assessment, along with other environmental and other studies related to removal will need to be completed. These funds could help address those environmental assessment costs.

1.f. Resources Needed for Site Reuse:

Financial Leveraging for Redevelopment This Assessment Grant is the catalyst for the Tribe's broader redevelopment strategy. Once environmental hurdles are cleared at the priority sites in Middle Village, Keshena, the Balsam Row Dam area, and Neopit, the Tribe is prepared to leverage committed and projected funds to complete cleanup and construction. The following specific funding streams were identified for each target area's end-use goals:

Housing Redevelopment (Middle Village):

- **HUD Indian Housing Block Grant (IHBG):** The Tribe actively manages IHBG funding authorized under Native American Housing Assistance and Self-Determination Act of 1996. These funds are the primary leverage for the construction of affordable housing units on the Middle Village.
- **Section 184 Indian Home Loan Guarantee Program:** For Tribal members seeking homeownership on these newly cleared lands, the Tribe facilitates access to Section 184 loans, encouraging private mortgage capital investment into the reservation's housing market.
- **Indian Health Service (IHS) Sanitation Facilities Construction:** The Tribe will coordinate with local IHS field offices to leverage funding for essential water and sewer infrastructure extensions required for the new Middle Village subdivisions.

Infrastructure and Public Works (Keshena and Balsam Row Dam):

- **Bureau of Indian Affairs (BIA) Road Maintenance and Construction Funds:** As noted in the priority site description, several dump sites impact Tribal roads. Following assessment, the Tribe may leverage BIA transportation funding to repair and upgrade access roads in the Balsam Row Dam and Keshena corridors, ensuring these routes are safe for future development.

Economic Development and Remediation:

- **Tribal Source Revenue:** The Tribe can use internal Tribal revenues (derived from gaming and forestry enterprises) to cover "gap" financing—costs that federal grants may not cover.
- **Wisconsin Stewardship Funds and GLRI:** For the riverfront sites (Keshena Falls and Balsam Row Dam), the Tribe may pursue Great Lakes Restoration Initiative (GLRI) grants and state stewardship funds to support shoreline restoration and the creation of public recreational access points post-cleanup.

1.g. Use of Existing Infrastructure:

The primary barrier to using the Reservation's existing infrastructure is not a lack of capacity, but the environmental concerns associated with the priority sites. For example, the Former Menominee County Highway Site and the Neopit East Dumpsite are situated directly along major transportation corridors (County Road M) and possess existing connections to the Menominee Tribal Utilities grid. However, these assets remain underutilized because contamination concerns prevent redevelopment. By using this grant to clear these sites, the Tribe can immediately leverage these existing road networks and utility infrastructure for the proposed riverfront park and community spaces without

incurring the high capital costs of new civil engineering. Similarly, the Balsam Row Dam priority site is anchored by an active hydroelectric facility; environmental clearance of the adjacent lands will allow the Tribe to expand recreational access using the facility's existing maintenance roads and power infrastructure.

Infrastructure Upgrades & Leveraged Funding: For priority sites requiring new infrastructure—specifically the Middle Village residential tracts—the Tribe has aligned this Brownfields proposal with a robust portfolio of secured and targeted funding sources to ensure successful reuse:

- **Housing Infrastructure:** To support the "Replace Neopit" housing initiative in Middle Village, the Menominee Tribal Housing Authority (MTHA) will leverage its annual HUD IHBG allocations to fund vertical construction. For larger-scale utility expansions, the Tribe is exploring the use of HUD Title VI Loan Guarantees, which allow the leveraging of future IHBG funds to secure upfront capital for subdivision infrastructure.
- **Transportation Improvements:** The reuse of sites in the Keshena and Neopit corridors will be supported by the Tribe's active partnership with the Wisconsin Department of Transportation.
- **Water and Sewer Expansion:** For sites requiring new sanitary connections, the Tribe will coordinate with the Indian Health Service (IHS) Sanitation Facilities Construction (SFC) program. This program is a primary resource for funding the water and waste disposal facilities essential for new homes in the Middle Village target area, ensuring that environmental assessment leads directly to habitable housing.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT:

2.a. The Community's Need for Funding:

- **Economic Distress & Low-Income Status:** The Tribe faces severe economic hardships that render the self-funding of environmental assessments impossible. The Tribe Reservation shares coterminous boundaries with Menominee County, which is consistently ranked as the poorest county in Wisconsin (and the only County in the State that has a "persistent poverty" classification). According to the most recent U.S. Census data, the poverty rate for Menominee County is approximately 21.2%, which is double the Wisconsin state average of 10.6%. The economic disparity is further illustrated by the County's Median Household Income (MHI), which sits at approximately \$59,528, significantly lower than the state median of approximately \$75,000. These figures confirm that the community lacks the disposable wealth found in other municipalities, leaving no local capital to direct toward speculative environmental investigations.
- **Small Population & Tax Base Limitations:** The Tribe's inability to draw on other funding sources is directly tied to our small population of approximately 3,200 residents and the Tribe's unique status as a federally recognized Tribe with land held in trust. Unlike a typical municipality that can levy property taxes to fund public works, nearly 99% of the land within the Reservation borders is held in federal trust and is therefore tax-exempt. The Tribe simply does not have the tax capability to generate a "general fund" surplus that could be used for Phase I and Phase II ESAs.
- **Restricted Federal Funding Streams:** While the Tribe receives federal funding from agencies such as the BIA and IHS, these funds are strictly "siloe" for essential services like healthcare, education, and basic road maintenance. Federal regulations prohibit the diversion of these operational funds toward environmental due diligence on non-essential or vacant properties. Furthermore, Tribal enterprises (gaming and forestry) operate on thin margins to support the government's operational deficits, leaving no unrestricted net profit available for brownfield remediation. Without this grant, potential redevelopment sites in Middle Village and Keshena will remain stalled because the Tribe cannot legally or financially justify diverting essential service funds to pay for site investigations.
- **Fiscal Gap & Need for EPA Assistance** The target areas of Middle Village, Keshena, and Balsam Row Dam, and Neopit are caught in a cycle of disinvestment: the Tribe is not able to attract private or federal housing capital (like HUD Section 184) until the environmental liabilities are quantified, but the Tribe cannot afford to quantify those liabilities without external aid. This EPA Assessment Grant serves as the critical "first money in", bridging the gap between the Tribe's restricted federal operational budgets and the leveraging of millions in future construction dollars. It provides the only viable mechanism for a small, low-income Tribal community to unlock the reuse potential of its own land.

2.b. Health or Welfare of Sensitive Populations:

- **Identification of Sensitive Populations:** The target areas of Middle Village, Keshena, Balsam Row Dam, and Neopit are home to a demographic that is economically disadvantaged and medically vulnerable. Menominee County consistently ranks 72nd out of 72 counties in WI for health outcomes, reflecting severe disparities. The most sensitive populations include children living in poverty (with rates >40%), Tribal elders suffering from chronic disease, and families relying on subsistence resources. In communities like Neopit and Keshena, these groups are concentrated in older, substandard housing stock built before the ban on lead-based paint and asbestos. Furthermore, Tribal members practicing traditional lifeways—fishing in the Wolf River and gathering plants near the Balsam Row Dam and forestry areas—are uniquely sensitive to environmental contaminants that accumulate in the food web.

- **Health & Welfare Issues:** The health burdens on these populations are severe and directly exacerbated by environmental conditions. Cancer has surpassed heart disease as a leading cause of death for the Tribe, with lung and respiratory cancers being particularly prevalent. This correlates with the presence of "burn pits," unregulated dump sites, and legacy asbestos in the deteriorating structures the Tribe aims to replace. Additionally, the community faces a diabetes rate of approximately 15% and high rates of asthma, which are compounded by living in damp, mold-prone housing or near dust-generating brownfields like the Keshena highway site.
- **Grant Strategy for Threat Reduction:** By conducting Phase I and II assessments on the "Agricultural Brownfields" in Middle Village, the Tribe can certify the land is safe for the construction of energy-efficient housing. For the Balsam Row Dam and Keshena Falls areas, assessment is the first step toward remediation that protects the Wolf River watershed. Ensuring this water resource is free from PCBs and run-off contaminants is essential for protecting the health of Tribal members who rely on the river for subsistence fishing and cultural ceremonies.

By identifying and characterizing the contamination at the "Pits and Dumps" and the Keshena Resource Center, the Tribe can prioritize cleanup efforts that remove the source of toxic exposure. This transition—from living amidst uncharacterized hazards to inhabiting cleared, safe lands—is an effective intervention available to improve the long-term welfare of our most sensitive members.

2.c. Greater Than Normal Incidence of Disease & Adverse Health Conditions:^a

- **Disproportionate Health Burdens:** The populations within the reservation have a documented, greater-than-normal incidence of chronic diseases directly linked to environmental factors. According to the 2024 County Health Rankings & Roadmaps (University of Wisconsin Population Health Institute), Menominee County consistently ranks 72nd out of 72 counties in Wisconsin for health outcomes. The data reveals large disparities: the age-adjusted mortality rate for the county is nearly double the state and national averages. Specifically, the community struggles with significantly elevated rates of respiratory ailments and cancer. The Wisconsin Department of Health Services reports that the age-adjusted rate of lung and bronchus cancer incidence in Menominee County is markedly higher than the state median. Furthermore, asthma prevalence—exacerbated by poor indoor air quality in aging housing and outdoor particulates from unpaved roads and burn pits—remains a critical concern, leading to higher rates of emergency department visits compared to surrounding counties.
- **Linking Health to Environmental Hazards:** These adverse health conditions are potentially associated with the hazardous substances present in the identified target areas. The high incidence of respiratory illness and asthma correlates with the presence of asbestos and lead paint in the dilapidated structures of the target areas. The "legacy" sites—such as the former Menominee County Highway site and the Balsam Row Dam storage areas—pose a risk of exposure to petroleum hydrocarbons (PHCs), VOCs, and potentially PCBs. Without assessment, the extent of soil and groundwater contamination remains unknown, leaving the community vulnerable to potential vapor intrusion in homes or contamination of the subsistence fishery in the Wolf River.
- **Grant Strategy for Identification & Threat Reduction:** This Assessment Grant is the essential tool for identifying and breaking these cycles of exposure. By funding Phase II ESAs, the Tribe can definitively identify whether carcinogens (like benzene from old fuel tanks) or persistent agricultural chemicals are present in the soil at the proposed Middle Village housing sites. The reuse strategy is explicitly designed to reduce threats: it facilitates the "Replace Neopit" initiative, which moves families out of deteriorating, mold-infested, and lead-contaminated housing into new, energy-efficient homes using this environmentally cleared land. Furthermore, assessing the "Pits and Dumps" allows the Tribe to engineer proper closures, preventing the leaching of toxins into the groundwater and reducing the community's overall chemical burden.

2.d Economically Impoverished/Disproportionately Impacted Populations:

The Tribe meets the definition of an economically impoverished community by every standard statistical measure. The MITW Reservation, which shares boundaries with Menominee County, is designated as a "persistent poverty county" and consistently ranks as the poorest in Wisconsin. US Census data indicates a poverty rate of approximately 21.2%, which is double the state average of 10.6%. The MHI on the Reservation is approximately \$59,000 (with per capita income significantly lower), compared to the state median of nearly \$75,000. This stark economic distress is not a result of market forces, but the direct legacy of the "Termination Era" (1954–1973), a federal policy that stripped the Tribe of its federal

^a References

1. **University of Wisconsin Population Health Institute.** (2024). *County Health Rankings & Roadmaps: Menominee County, WI*. Retrieved from www.countyhealthrankings.org
 - Reference for: Ranking 72/72 in Wisconsin; premature death rates; poor physical health days.
2. **Wisconsin Department of Health Services.** (2023). *Wisconsin Environmental Public Health Tracking: Cancer Incidence and Asthma Data*.
 - Reference for: Lung/Bronchus cancer rates and asthma emergency department visit disparities.

recognition, liquidated Tribal assets, and collapsed the local economy, driving unemployment rates to nearly 70% during that period. The community has never fully recovered financially, leaving no local tax base to fund environmental remediation.

The target areas in Middle Village and Keshena are a direct result of disproportionate negative environmental consequence from federal governmental operations and policies. The "agricultural brownfields" in Middle Village are the direct result of the U.S. government's failed historical policy to force the Menominee people—traditionally foresters and hunter-gatherers—into a Western agrarian society. These lands were cleared and chemically treated for farming operations that were culturally incompatible and economically unsustainable, leaving behind fallow fields with unknown chemical legacies. Similarly, the "pits and dumps" in Keshena and the Balsam Row Dam area stem from the BIA's historical mismanagement of Tribal infrastructure, when the Tribe was forced to defer maintenance and waste management to survive. Furthermore, the Tribe has historically suffered from industrial exploitation, evidenced by the U.S. Forest Service's past clear-cutting of Menominee timber against Tribal sustained-yield principles—a mismanagement so severe the Tribe successfully sued the federal government for damages in 1951.

By funding the assessment of the Middle Village agricultural lands, the Tribe can reclaim this space from the "agrarian experiment" and repurpose it for culturally appropriate, energy-efficient housing that meets the modern needs of MITW members. Assessing the Keshena and Balsam Row Dam dump sites allows the Tribe to address the "Termination legacy" of unregulated waste disposal, replacing blight with modern infrastructure.

Community Engagement:

2.e. Project Involvement / 2.f. Project Roles: The MITW has established a strong network of internal and external partners to ensure the grant creates sustainable outcomes.

- **Menominee Tribal Government** (Honorable Chairman Joey Awonohopay, chairman@mitw.org): The Chairman's Office functions as the hub of communication to include the Executive and Legislative branches to facilitate communication to Tribal membership, governmental agencies, and other Tribal entities which will provide leadership support and Tribal Council resolutions as needed.
- **MITW Environmental Services Department (ESD)** (Jeremy Pyatskowitz, Director, jpyatskowitz@mitw.org): The Environmental Dept. has historically been involved in coordinating compliance to assess and remediate potentially hazardous sites on Tribal land, abandoned properties, and new real estate. They will attend Brownfield Roundtable meetings to ensure protection of natural resources and assist with site prioritization.
- **MITW Historic Preservation Department (HPD)** (David Grignon, THPO, dgrignon@mitw.org): Aspects of traditional culture remain vital on the reservation. The HPD can participate in Brownfield Roundtable meetings to ensure that any land targeted for future housing (such as new tracts in the Middle Village area) has cultural preservation woven into the environmental assessment.
- **MITW Land Management Department** (Douglas Cox, Director, dgcox@mitw.org): Participate in Brownfield Roundtable meetings to support environmental stewardship, land use planning, and handling realty services necessary for any sites.
- **College of Menominee Nation (CMN)** (Chris Caldwell, President, chriscaldwell@menominee.edu): This partnership provides a workforce development opportunity, as students can shadow environmental professionals during the assessment activities.
- **MITW Tribal Housing Department** (Wayne Wilbur, Housing Director, wwilber@mitw.org): As the primary end-user for the residential sites, the Housing Department is a critical partner. The Housing Department's "service area" for HUD funded housing initiatives and programs is Menominee, Shawano, Langlade and Marathon Counties. Because HUD-funded housing initiatives must meet criteria for public health and safety, plans for assessment and clean-up require the Housing Department's input and awareness.
- **Menominee Tribal Enterprises (MTE)** (Jennifer Peters, Chief Operation Officer, JenniferP@mtewood.com; Ron Waukau, Forest Manager, Ronw@mtewood.com): one of the oldest known continuous operating Tribal industries in America. Committed to excellence in the sustainable management of our forest and the manufacturing of lumber and forest products. MTE will serve as a primary collaborator, assisting with site prioritization and stakeholder engagement.
- **Wolf River Development Company** (Crystal Chapman-Chevalier, CEO, administration@wolfriverdev.com): The Wolf River Development Company (WRDC) considers, pursues, and conducts profit-generating nongaming commercial activity of the Tribe deemed advisable by the Board of Directors. The WRDC also supports and fosters the establishment of Tribally and privately owned businesses on the Reservation. Because assessment of Tribal lands will provide opportunities for future business development, grant implementation requires WRDC's input and awareness.
- **Menominee County** (Jerney Johnson, Zoning Administrator, jerneyj@co.menominee.wi.us): The County supports all citizens of Menominee County live within our environment respectfully and adhere to all applicable regulations. Provide collaboration with Menominee County.

- **U.S. EPA Region 5** (Macy Pressley, Brownfields, Resource Conservation and Recovery Act, Air, and Tribes pressley.macy@epa.gov): The Tribe will continue successful government-to-government relationship with U.S. EPA Region 5. The Tribe will rely on their technical experts to assist with complex regulatory determinations, particularly regarding the “agricultural brownfields” status and the specific cleanup standards required for residential reuse in Middle Village.
- **Wisconsin Dept. of Natural Resources (WDNR)** (Michael Prager, Remediation Redevelopment Program Coordinator, michael.prager@wisconsin.gov): Tribe will continue collaborations with WDNR. WDNR’s technical experts can assist with specific cleanup standards required for residential reuse in Middle Village and species information related to Balsam Row Dam.
- **Wolf River Hydro Limited Partnership** (Northwest Registered Agent, central@northwestregisteredagent.com): Wolf River Hydro Limited Partnership (WRHLP) is responsible for managing the Balsam Row Dam and implementing directives from the Federal Energy Regulatory Commission (FERC). The Tribe will coordinate with WRHLP to address contamination from Dam facilities.

2.g. Incorporating Community Input:

- **Community Involvement Plan:** The Tribe understands effective community engagement is not just a requirement but the foundation for effective grant implementation. To ensure this project aligns with the needs of our members the Tribe will implement a Community Involvement Plan. We will leverage our existing government communication methods to solicit input on site selection, assessment priorities and reuse planning. Elements of that plan include:
- **Project Webpage:** The Tribe will create a dedicated Brownfields section on the official Menominee-nsn.gov website. This page will serve as hosting site for the digitized “Menominee Pits and Dumps” map updates, fact sheets on priority sites like the former Highway Dept. and clear instructions on how community members can submit a Report a Site forms.
- **Brownfield Roundtable Meetings:** To ensure technical coordination, the Environmental Services Department will host quarterly inter-departmental roundtable meetings with our key partners, Menominee Tribal Housing Authority (MTHA), Menominee Tribal Enterprises (MTE), and the Tribal Historic Preservation Office (THPO). These meetings will coordinate upcoming assessments with planned developments such as the Replace Neopit housing initiative to maximize the impact of grant funds and avoid duplication.
- **Community & General Council Meetings:** The Tribe will utilize the regular General Council meetings to provide updates and solicit feedback. These in-person sessions are critical for reaching elders and residents who may not use digital devices, allowing them to voice concerns about specific sites they may have knowledge of like the Neopit East Dumpsite to project staff.
- **Social Media:** The Tribe will utilize its active social media channels to ensure that residents, off reservation members and younger generations stay informed. These platforms will be used to announce assessment milestones for example. This method will allow stakeholders to provide meaningful input into all phases of work in almost real time if needed. Sustained outreach will ensure the project concludes with strong community backing.
- **Menominee Nation News:** We will publish quarterly updates in the Menominee Nation News, the Tribes official newspaper, which is widely read and available to, the tribal members. These articles will feature a plain-language explanation of the environmental work and could include a frequently asked questions section.
- **Leg Work:** Recognizing not all members attend formal Tribal meetings, Environmental Services staff may conduct outreach at community hubs, such as the College of Menominee Nation and local schools. This ensures a connection with youth, busy parents, and residents in more remote areas who might otherwise be excluded from the planning process.

In summary, the Menominee Tribe will execute a comprehensive Community Involvement Plan as discussed above that synthesizes technical assessment data with stakeholder feedback. This systematic approach ensures data-driven, fully aligned site prioritization and reuse planning.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS:

Description of Tasks (a. Project Implementation; b. Anticipated Schedule; c. Task/Activity Lead; and d. Outputs): MITW is requesting \$2,000,000 funding to inventory, assess and plan the cleanup/reuse of priority brownfields in three target areas (TAs). The scope of work is organized into four tasks, with responses to Sections 3.a.-3.d. provided under each task.

Task 1: Grant Management, Reporting & Other Activities
<p>a. Implementation (Activities): MITW will manage all aspects of the project, including coordination with EPA, project partners and the Qualified Environmental Professional (“QEP” or “Consultant”). Reporting will include: 1) Quarterly Progress Reports (QPRs); 2) Property Profiles/ACRES Updates; 3) Annual Federal Financial Reports (FFRs); and 4) A Final Performance Report documenting outputs, outcomes & accomplishments. MITW will meet regularly with the EPA Project Officer to keep the project moving forward. Two MITW staff will attend up to four conferences over the 5-year period.</p>

<p>b. <u>Schedule</u>: Grant Management and Reporting will be ongoing throughout the five-year implementation period. State/regional and national brownfield conferences will occur in 2026-2030.</p>
<p>c. <u>Lead</u>: MITW will lead this task. The Consultant will assist with management and reporting activities.</p>
<p>d. <u>Outputs</u>: 20 QPRs; five FFR Reports; ACRES Entries/Updates; one Final Performance Report. Two MITW staff will attend up to two state/regional events and two national brownfield conferences.</p>
<p>Task 2: Community Engagement, Brownfield Inventory & Site Selection</p>
<p>a. <u>Implementation (Activities)</u>: <u>Community Engagement</u>: MITW engaged with its tribal partners to solicit input regarding the target areas, priority sites, and reuse plans, and will continue to do so throughout the project. MITW has also solicited commitments from its partners to participate engagement activities and provide other contributions. Detailed engagement plans are described in Section 2. and include: 1) Preparing a Community Involvement Plan (CIP); 2) Preparing fact sheets, establishing a webpage, and using social media to solicit input/communicate progress; 3) Forming a Brownfield Advisory Committee (BAC) and hosting up to 12 Meetings; and 4) Other activities. <u>Inventory/Site Selection</u>: As part of the inventory process, MITW will engage with the BAC and other stakeholders to gather information on priority sites and potential reuse plans/strategies. The QEP will conduct file reviews and site reconnaissance activities to evaluate existing conditions. The BAC will inform the prioritization process and ensure the project focuses on activities that provide the greatest outcomes. Site selection will include preparing site eligibility determination (ED) requests.</p>
<p>b. <u>Schedule</u>: <u>Community Engagement</u>: The CIP, fact sheets and webpage will be developed during the first quarter (1Q). A BAC kick-off meeting will be held during 1Q and convened quarterly for the first year, and semi-annually thereafter. MITW will conduct outreach on an ongoing basis, including providing regular project updates utilizing established networks and communication channels. <u>Brownfield Inventory/Site Selection</u>: Activities will begin in 1Q and continue over the course of the entire project. As several priority sites are known, initial site ED requests will be completed during 1Q. Identification of additional sites will occur as part of planned site reconnaissance and stakeholder engagement activities during the first year. This process will continue until funds are fully committed.</p>
<p>c. <u>Leads</u>: MITW will lead this task, with support from the BAC, consultant, and key stakeholders.</p>
<p>d. <u>Outputs</u>: CIP; fact sheets; press releases/articles; webpage/social media content; 12 BAC Meetings (including presentations, minutes, etc.); Brownfield Inventory Report and corresponding data files (GIS; tables; figures); and preparation/submittal of 20+ site ED request forms.</p>
<p>Task 3: Phase I/II ESAs, Regulated Building Materials (RBM) Surveys & Cleanup Plans</p>
<p>a. <u>Implementation (Activities)</u>: Includes completion of up to 18 Phase I ESAs (in accordance with AAI Final Rule/ASTM E1527-21 Standard) and up to 14 Phase II ESAs at priority sites. Some sites contain old structures; therefore, budget is included for up to 10 RBM Surveys. Budget is included for up to 10 Analysis of Brownfield Cleanup Alternatives (ABCAs) and/or Cleanup Action Plans (CAPs). This task also includes preparing: 1) Access Agreements; 2) an EPA-approved Master Quality Assurance Project Plan (QAPP) prior to Phase II ESAs and/or RBM Surveys; 3) EPA-approved Sampling and Analysis Plans (SAPs) and site-specific Health & Safety Plans (HASPs) prior to Phase II ESAs and/or RBM Surveys; and 4) National Historic Preservation Act (NHPA) §106 and Endangered Species Act §7(a)(2) consultations.</p>
<p>b. <u>Schedule</u>: Year 1: QAPP, 6 Phase I ESAs, 4 Phase II ESAs, 4 RBM Surveys. Year 2: 4 Phase I ESAs, 4 Phase II ESAs, 2 RBM Surveys, 3 ABCAs/CAPs. Year 3: 4 Phase I ESAs, 3 Phase II ESAs, 2 RBM Surveys, 4 ABCAs/CAPs. Year 4: 4 Phase I ESAs, 3 Phase II ESAs, 2 RBM Surveys, 3 ABCAs/CAPs.</p>
<p>c. <u>Lead</u>: The QEP will lead this task under the direction of MITW, who will also assist with access/reviews.</p>
<p>d. <u>Outputs</u>: 1 Master QAPP; 18 Phase I ESAs; 14 Phase II ESAs; 10 RBM Surveys; 10 ABCAs/CAPs.</p>
<p>Task 4: Site-Specific Reuse Plans & Area-Wide Plans (AWPs)</p>
<p>a. <u>Implementation (Activities)</u>: Includes preparing two Brownfield AWP Studies, including an existing conditions assessment, market/feasibility study, evaluation of infrastructure needs/capital improvement plan, preparing conceptual plans/renderings, and preparing an overall reuse strategy. The consultant will also complete up to eight Site-Specific Reuse Plans for priority brownfields.</p>
<p>b. <u>Schedule</u>: Year 1: AWP Starts, 2 Site Reuse Plans Year 2: AWP Ongoing, 2 Site Reuse Plans Year 3: AWP Completed, 2 Site Reuse Plans Year 4: 2 Site Reuse Plans.</p>
<p>c. <u>Lead</u>: The Consultant will lead the technical elements of this task under the direction of MITW.</p>
<p>d. <u>Outputs</u>: Two Brownfield AWP Studies and eight Site-Specific Reuse Plans.</p>

3.e. Cost Estimates: A summary of the budget for grant funded activities by task and budget category is provided in the table. No equipment or indirect costs are being requested. **69.4% (= \$1,387,500) of the total budget is directly allocated to site-specific activities** [Phase I/II ESAs and cleanup planning (Task 3)].

Budget Categories	Task 1	Task 2	Task 3	Task 4	Totals
	Grant Management, Reporting	Engagement, Inventory & Site Selection	Phase I/II ESAs, & Cleanup Plans	Reuse Plans & Area-Wide Planning (AWP)	
Personnel	\$25,000	\$12,500	\$12,500	\$12,500	\$62,500
Fringe Benefits	\$15,000	\$7,500	\$7,500	\$7,500	\$37,500
Travel	\$16,000	\$0	\$0	\$0	\$16,000
Supplies	\$500	\$750	\$0	\$0	\$1,250
Contractual	\$43,200	\$54,000	\$1,394,300	\$290,000	\$1,781,500
Other	\$500	\$750	\$0	\$0	\$1,250
Total Direct Costs	\$100,200	\$75,500	\$1,414,300	\$310,000	\$1,900,000
Indirect Costs	\$25,000	\$25,000	\$25,000	\$25,000	\$100,000
Total Budget	\$125,200	\$100,500	\$1,439,300	\$335,000	\$2,000,000

The following provides a breakdown of the estimated costs for project activities by task and budget category.

Task 1 – Grant Management, Reporting & Other Activities: Total Budget = \$125,200
Includes <u>MITW Personnel + Fringe Costs</u> of \$40,000 (500 hrs @ \$80/hr ¹ ; \$25,000 personnel/\$15,000 fringe) to complete grant management, reporting and other activities. <u>Travel Costs</u> of \$16,000 are budgeted for expenses for up to two MITW staff to attend four conferences. Costs are estimated at \$2,000/person/event (\$750 airfare, \$800 hotel, and \$450 incidentals). <u>Contractual Costs</u> of \$43,200 are budgeted (240 hrs at \$180/hr ²) for the consultant to assist with reporting and other activities. <u>Supplies Costs</u> of \$500 (meeting materials) and <u>Other Costs</u> of \$500 (e.g. -printing/advertising) are also budgeted. <u>Indirect Costs</u> of \$25,000 ³ are budgeted.
Task 2 – Community Engagement, Brownfield Inventory & Site Selection: Total Budget = \$100,500
Includes <u>MITW Personnel + Fringe Costs</u> of \$20,000 (250 hrs @ \$80/hr ¹ ; \$12,500 personnel/\$7,500 fringe) to coordinate community outreach/engagement, inventory and site selection. <u>Contractual Costs</u> of \$54,000 (300 hrs @ \$180/hr ²) to assist with engagement, inventory, and site selection. <u>Supplies Costs</u> of \$750 (meeting materials) and <u>Other Costs</u> of \$750 (e.g. -printing/advertising) are also budgeted. <u>Indirect Costs</u> of \$25,000 ³ are budgeted.
Task 3 – Phase I/II ESAs, RBM Surveys & Cleanup Plans: Total Budget = \$1,439,300
Includes <u>MITW Personnel + Fringe Costs</u> of \$20,000 (250 hrs @ \$80/hr ¹ ; \$12,500 personnel/\$7,500 fringe) for facilitate assessment/cleanup planning activities and to review and submit deliverables. <u>Contractual Costs</u> of \$1,394,300 include costs for the QEP to complete one Master QAPP (\$6,800); 20 Phase I ESAs (\$6,500 each = \$130,000); 18 Phase II ESAs (\$60,000 each = \$1,080,000); 10 RBM Surveys (\$8,000 each = \$80,000); and 10 ABCAs/CAPs (\$9,750 each = \$97,500). Costs for Health & Safety Plans (HASPs), Sampling & Analysis Plans (SAPs) and/or other consultations are included in unit costs for other outputs. <u>Indirect Costs</u> of \$25,000 ³ are budgeted.
Task 4 – Site-Specific Reuse Plans & Area-Wide Plans (AWPs): Total Budget = \$335,000
Includes <u>MITW Personnel + Fringe Costs</u> of \$20,000 (250 hrs @ \$80/hr ¹ ; \$12,500 personnel/\$7,500 fringe) to participate in planning activities and review and submit deliverables. <u>Contractual Costs</u> of \$290,000 are included. Consultant to complete two Brownfields AWP Studies (\$85,000/AWP Study; includes an existing conditions evaluation, market study, infrastructure strategy, and conceptual plans). Consultant will also complete up to eight Site-Specific Reuse Plans (\$15,000 each = \$120,000) at priority brownfields. <u>Indirect Costs</u> of \$25,000 ³ are budgeted.

¹MITW Personnel (average \$50/hr) + Fringe Benefits (average \$30/hour) = \$80/hour. ²Average QEP cost = \$180/hour. ³MITW is requesting 5% of the total budget (= \$100,000) for indirect costs for administrative expenses, split evenly between Tasks 1-4 (= \$25,000/task).

3.f. Plan to Measure & Evaluate Environmental Progress & Results: The status and date of completion of **outputs** and **short- and long-term outcomes** will be reported to EPA via Quarterly Progress Reports (QPRs) and prompt entry/updates in ACRES. QPRs will list accomplishments during the current and previous quarters, as well as activities planned for the next quarter. Significant deviations in schedule or scope will be discussed with the EPA Project Officer (PO). Between QPRs, activities and **outputs** will be tracked on a spreadsheet, including: (1) # of BAC and/or Stakeholder Meetings; (2) # of brownfields identified/prioritized/ approved, (3) # of Phase I ESAs, (4) # of SAPs, Phase II ESAs and/or RBM Surveys, (5) # of ABCAs and/or CAPs; (6) # of Site Reuse Plans; and (7) status of AWP activities. The priority sites will be linked to spatial data, to allow for analysis of outcomes using GIS. The following **short- and long-term outcomes** will be tracked: (1) # of sites and acres assessed; (2) # of sites and acres restored/reused; (3) \$ of private investment and leveraged funding; (4) # of jobs created and/or retained; and (5) other benefits. These mechanisms will ensure the project addresses EPA objectives and MITW’s project goals. MITW will update ACRES beyond the close-out date to ensure outcomes are captured as restoration/reuse activities are completed.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE:

4.a. Organizational Capacity / 4.b. Organizational Structure / 4.c. Description of Key Staff: The Tribe is well qualified to lead a successful EPA Brownfield Grant project, having developed the organizational capacity and grant management experience during implementation of EPA and other state and federal grants, as well as relying on our nearly 90 years of organizational experience in managing, developing, and coordinating the cleanup and reuse of the Tribe's lands.

The **Community Development Department** and its program are assisted in grant management by an established program monitoring/grant management component of the Tribe's Department of Administration that includes monitoring of timely expenditures and reporting; an Internal Audit Department further conducts program reviews to assure grant compliance and adherence to sound fiscal principals.

The **Procurement Department** ensures that all purchases of goods and services comply with applicable Federal, State and Tribal acquisition laws and regulations. The Tribe has an established accounting manual and a personnel policies and procedures that establish operational and accounting procedures as well as human resources procedures.

The **Department of Administration** has a Grant and Contract monitoring program where the Grants Manager will work directly with the Community Development Program to ensure compliance with the grant requirements. Additionally, the departments will work together to regularly review performance data.

Further, the Tribe's capacity to administer a grant of this scope is evidenced by documentation by from the Finance Department indicating that the Tribe currently manages approximately 340 Federal, State, local contracts and grants that total over \$58,000,000. The **Human Resources Department** implements the Tribe's established Personnel Policies and Procedures in all aspects of hiring and employee development.

The Tribe's management team will lead all grant activities with support from other Tribal staff, project partners and the QEP team. The QEP team will be responsible for implementation of technical activities and compliance reporting to EPA under the direction of the Tribe. A primary goal throughout the project will be to effectively integrate work under this grant with our partners who are performing related work under the Section 128(a) Tribal Response Programs. Key Tribal staff and their roles are described below:

- **Project Director – Natasha Chevalier, Community Development & Utilities Department Director**, will support overall project implementation and coordination for the Community-Wide Assessment Grant. Responsibilities include coordination with EPA, collaborating with other project partners. She will assist with required grant management and reporting activities, including Quarterly Progress Reports, Annual Federal Financial Reports, Assessment, Cleanup and Redevelopment Exchange System (ACRES) updates, and the Final Performance Report. Mrs. Chevalier will also support the Project Coordinator and partners with tracking progress toward project goals and objectives, supporting coordination across departments and consultants, and helping to identify and resolve implementation barriers to ensure timely and effective project delivery. Mrs. Chevalier has experience in overseeing and coordinating infrastructure and community-focused projects. Her responsibilities span assisting in grant administration, inter-departmental coordination, financial and performance reporting, and internal project oversight. Mrs. Chevalier brings extensive experience working with Tribal departments, federal partners, and consultants to ensure compliance, timely implementation, and successful delivery of project goals.
- **Project Coordinator - Darryl Pyawasay, Community Development Department, Assistant Director**, is a seasoned professional with 33 years of experience in industrial and utility operation, management, safety, and regulatory compliance. Mr. Pyawasay will support the Director in carrying out activities related to grant implementation and internal coordination. Mr. Pyawasay will also work closely with Land Management, Environmental staff, consultants, and community partners to support community engagement efforts, brownfield inventory development, site selection activities, and associated outputs. Mr. Pyawasay will further assist Land Management and Environmental staff by supporting coordination with the QEP and consultants, facilitating access and reviews as needed, and contributing to implementation of environmental assessments, cleanup planning, and reuse planning activities.
- **Financial Manager - Carmella Waupoose, Office & Financial Manager:** Responsible for all financial compliance aspects of the MITW grants, including budget tracking, documentation, reporting, and drawdowns. She brings over 30 years of experience in office and grant administration. She will provide administrative and financial support for grant implementation by assisting with the processing of financial payments, preparation of purchase orders, and support of budget modifications. Her role will help ensure accurate financial tracking, timely submissions, and compliance with federal and Tribal financial and grant management requirements. Ms. Waupoose will review all quarterly budget summaries for accuracy and consistency.

Additional staff anticipated to support the project include:

- **Jeremy Pyatskowitz, Environmental Services Department Director**, Mr. Pyatskowitz and his team will assist with establishing the goals and objectives to ensure the project is a success. Mr. Pyatskowitz is responsible for overseeing the management of fishery, wildlife and water resources of the reservation.

- **David Grignon, Tribal Historic Preservation Officer**, a Menominee elder and preservationist, has dedicated his life to preserving the traditions and history of the Menominee people. Mr. Grignon's efforts are aimed at educating the public about the Menominee's history and the importance of environment, culture, and language. He has been instrumental in the Menominee's efforts to revitalize traditional language and cultural resources, ensuring that Menominee Tribal identity is passed down through the language. He will be instrumental in procuring the support of both Tribal members and the public for implementation of this grant. Mr. Grignon's commitment to preserving the Menominee's traditions and history is a testament to his dedication to the Tribe's future.
- **Doug Cox, Director of Land Management**, has over three decades of experience in environmental protection and regulatory management, including work with federal and state agencies. Recently, he was appointed to the Wisconsin Department of Natural Resources Board, marking a historic role for a Menominee Tribal member. Mr. Cox's background includes serving as a forest ecologist and environmental program coordinator, and he has been involved in various initiatives to preserve the Tribe's culture and heritage. He will be instrumental in leadership for land management planning related to grant implementation and promoting environmental stewardship.

4.d. Acquiring Additional Resources: The Tribe routinely contracts for engineering and consulting services and has expertise complying with federal procurement requirements. The Tribe does not intend to award any subgrants but does plan to retain a QEP team to support programmatic management and all technical aspects of the project. Because of conditions specific to a northern continental location near the Great Lakes, it is critical to use contractors with a history of successful performance in the region. The Tribe notifies contractors of RFP/Qs via direct email and publication on the Tribal website. The Tribe's RFP/Q process includes development of the RFP/Q in-house with review by legal staff prior to issuance; review of proposals by a selection committee, potentially including interviews; and scoring/ranking of proposals. Contractors are selected based on the scoring and selection criteria specified in the RFP/Q. Contracts are then executed with the selected firm subject to further legal review. The Tribe will secure a QEP upon notice of grant award. The Tribe will abide by EPA procurement requirements (2 CFR § 200.317-326 and *Best Practice Guide for Procuring Services, Supplies & Equipment*).

4.e. Currently Has or Previously Received and EPA Brownfields Grant: MITW has received one EPA Brownfield Grant which is ongoing.

(1) Accomplishments:

U.S. Environmental Protection Agency, MITW EPA Region 5 CERLA 128(a). Award #RP-14E00874. Fiscal Year 2025-2026 The MITW EPA Region 5 CERLA 128(a) is an ongoing program of the Menominee Tribal Environmental Services Department. The Tribe uses funds to oversee and perform planning, assessment, and cleanup of brownfield sites. The Tribe has on staff an Environmental Scientist-Program Coordinator who is responsible for completing program activities. He manages CERCLA 128(a) EPA Tribal Response Brownfields Grant and serves as EPA GAP Coordinator, along with helping to oversee various other environmental programs. The Environmental Services Department Director oversees all grant activity. He develops and oversees programs aimed and implementing, monitoring and enforcing various environmental programs and codes of the Tribe.

The MITW has received funding from the Comprehensive Environmental Response and Cleanup Liability Act (CERCLA), in 2022: RP12E00874-0, 10/01/2023-09/30/2024, all funds were spent as appropriate. The Tribe executed EPA Goal 1 (Core Mission) and Objective 1.3 Revitalize Land and Prevent Contamination by successfully performing and inventory of Brownfield sites, conducted targeted brownfield site assessments and enhanced the public record system of the workplan of the agreement and CERCLA 128 (a).

The funding allowed ESD to investigate, inventory and determine if sites qualified as a Menominee Brownfields site, determined by Tribal Code. ESD was then also able maintain response readiness, train tribal staff, stay abreast of response and clean up approaches, participate in Emergency Preparedness Committees and update/maintain comprehensive listing of all possible contamination sites and update the GIS database.

In addition, staff attended one Regional Brownfield Conference and one National Conference. The Brownfield Coordinator got certified with the State of Wisconsin in Soil Testing and POWTs Inspecting for Tribal code enforcement.

(2) Compliance with Grant Requirements

The Tribal Response Program successfully communicated progress and concerns to US EPA through reporting requirements, conference calls, and regular correspondence. Through successful implementation of funding and reporting to the granting agency, the Annual PALS report on the ACRES database, and Tribal Leadership, ESD was able to maintain personnel with appropriate technical skills capable of evaluating findings of any site assessments make determinations as to the need for clean-ups, clean up protocols for various media using current standards and/or EPA's presumptive remedies the Tribe is positioned well to implement this proposed project. All quarterly reports have been submitted on time and in compliance with EPA standards.

1. APPLICANT ELIGIBILITY: The Menominee Indian Tribe of Wisconsin (MITW or “the Tribe”) is a federally-recognized Indian Tribe. Therefore, MITW is eligible to receive a U.S. Environmental Protection Agency (EPA) Brownfield Grant.

2. COMMUNITY INVOLVEMENT: The following elements will comprise the Tribe’s community involvement:

- **Community Involvement Plan:** The Tribe understands effective community engagement is not just a requirement but the foundation for effective grant implementation. To ensure this project aligns with the needs of our members the Tribe will implement a Community Involvement Plan. We will leverage our existing government communication methods to solicit input on site selection, assessment priorities and reuse planning. Elements of that plan include:
- **Project Webpage:** The Tribe will create a dedicated Brownfields section on the official Menominee-nsn.gov website. This page will serve as hosting site for the digitized “Menominee Pits and Dumps” map updates, fact sheets on priority sites like the former Highway Dept. and clear instructions on how community members can submit a Report a Site forms.
- **Brownfield Roundtable Meetings:** To ensure technical coordination, the Environmental Services Department will host quarterly inter-departmental roundtable meetings with our key partners, Menominee Tribal Housing Authority (MTHA), Menominee Tribal Enterprises (MTE), and the Tribal Historic Preservation Office (THPO). These meetings will coordinate upcoming assessments with planned developments such as the Replace Neopit housing initiative to maximize the impact of grant funds and avoid duplication.
- **Community & General Council Meetings:** The Tribe will utilize the regular General Council meetings to provide updates and solicit feedback. These in-person sessions are critical for reaching elders and residents who may not use digital devices, allowing them to voice concerns about specific sites they may have knowledge of like the Neopit East Dumpsite to project staff.
- **Social Media:** The Tribe will utilize its active social media channels to ensure that residents, off reservation members and younger generations stay informed. These platforms will be used to announce assessment milestones for example. This method will allow stakeholders to provide meaningful input into all phases of work in almost real time if needed. Sustained outreach will ensure the project concludes with strong community backing.
- **Menominee Nation News:** We will publish quarterly updates in the Menominee Nation News, the Tribes official newspaper, which is widely read and available to the tribal members. These articles will feature a plain-language explanation of the environmental work and could include a frequently asked questions section.
- **Leg Work:** Recognizing not all members attend formal Tribal meetings, Environmental Services staff may conduct outreach at community hubs, such as the College of Menominee Nation and local schools. This ensures a connection with youth, busy parents, and residents in more remote areas who might otherwise be excluded from the planning process.

In summary, the Menominee Tribe will execute a comprehensive Community Involvement Plan as discussed above that synthesizes technical assessment data with stakeholder feedback. This systematic approach ensures data-driven, fully aligned site prioritization and reuse planning.

3. EXPENDITURE OF EXISTING GRANT FUNDS: Not applicable. MITW does not have an existing EPA Brownfield Grant, nor have we received one.

4. TARGET AREAS & PRIORITY SITES: Three target areas and six priority sites have been identified for brownfield revitalization efforts. The target areas are described in Part 5 of the Application Information Sheet. Per EPA requirements, MITW will assess a minimum of 10 sites during the period of performance.

Attachment A - Threshold Criteria Responses

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5. CONTRACTORS AND NAMED SUBRECIPIENTS:

5.a. Contractors: Not applicable. (MITW will complete procurement following grant award.)

5.b. Named Subrecipients: Not applicable. (No subrecipients are named in this application nor are any anticipated.)