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**CHEROKEE NATION**<sup>®</sup>

P.O. Box 948 • Tahlequah, OK 74465-0948  
918-453-5000 • www.cherokee.org

**Chuck Hoskin Jr.**

*Principal Chief*  
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**Bryan Warner**

*Deputy Principal Chief*  
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**Cherokee Nation Brownfields Cleanup Grant Application  
Narrative Information Sheet**

R06-26-C-004

**1. Application Identification:**

Cherokee Nation  
P.O. Box 948  
Tahlequah, Oklahoma 74465

**2. Website URL:**

<https://cherokee.org>

**3. Funding Requested:**

- a. **Grant Type:** Multi-Site Cleanup
- b. **Federal Funds Requested:** \$1,082,700.00

**4. Locations:**

All sites are located within the Cherokee Nation Reservation.

**a. City:**

- Markoma Stucky Hall Building – Tahlequah, Oklahoma
- Lost City School – Hulbert, Oklahoma

**b. County:**

- Markoma Stucky Hall Building – Cherokee County, Oklahoma
- Lost City School- Cherokee County, Oklahoma

**c. State:**

- Markoma Stucky Hall Building and Lost City School are all located in the State of Oklahoma, within the Cherokee Nation Reservation.

**5. Property Information:**

- Markoma Stucky Hall Building – 883 Markoma Circle, Tahlequah, Oklahoma, 74464
- Lost City School – 13243 North Lost City Road, Hulbert, Oklahoma, 74441

**6. Contacts:**

**a. Project Director:**

Jason White  
Cherokee Nation  
P.O. Box 948  
Tahlequah, OK 74465-0948  
918-453-5110, Jason-white@cherokee.org

**b. Chief Executive/Highest Ranking Elected Official**

Principal Chief Chuck Hoskin Jr.

P.O Box 948

Tahlequah, OK 74465-0948

918-453-5000, grants@cherokee.org

**7. Population:**

- Tahlequah, Oklahoma – Markoma Stucky Hall: 17,319
- Hulbert, Oklahoma – Lost City School: 493

**8. Other Factors:**

<b>Other Factors</b>	<b>Page #</b>
Community Population is 15,000 or less.	1
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	1
The proposed brownfield site(s) is impacted by mine-scarred land.	No
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	2 & 3
The proposed site(s) is adjacent to a body of water (i.e.. the border of the proposed 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).	No
The proposed site(s) is in a federally designated flood plain.	No
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	No
The reuse of the proposed site(s) will incorporate energy efficiency measures.	2
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	2
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	No

**9. Releasing Copies of Applications:**

This criterion is not applicable as the application does not have confidential, privileged, or sensitive information.

**FY26 Brownfields Cleanup Grant Application**  
**Cherokee Nation**  
**Narrative Proposal**

**1. Project Area Description and Plans for Revitalization**

**Target Area and Brownfields**

**1.a. Overview of Brownfields Challenges and Description of Target Area**

Cherokee Nation (CN) is a sovereign tribal government and the largest federally recognized Native American tribe, with more than 477,431 citizens worldwide. Over 144,465 reside within CN's reservation in northeastern Oklahoma, which spans more than 7,000 square miles, over half of which is in rural areas.

Brownfields challenges within the reservation often stem from limited local capacity to conduct Environmental Site Assessments (ESAs), identify contamination, and access resources for cleanup. Many communities lack funding for ESAs or remediation, making external support critical. Without assistance, properties remain underutilized, posing environmental and health risks and hindering economic development.

This grant will provide essential resources for cleanup and reuse planning, reduce environmental threats, and strengthen partnerships between communities. Revitalizing these properties will create opportunities for economic growth and improve the quality of life. Target area sites include Stucky Hall on the CN Markoma Campus in Tahlequah and the Lost City School complex in Hulbert, both in Cherokee County, Oklahoma. The population of Tahlequah, Oklahoma is 17,319, and the population of the Lost City/Hulbert Community is 493. Both communities face specific Brownfields challenges and would benefit from cleanup and reuse in these areas. The Tribe will also support cultural preservation activities since both sites are important to CN.

**1.b. Description of the Proposed Brownfield Sites**

The Stucky Hall building is located on the CN Markoma Campus at 886 Markoma Drive, Tahlequah, Cherokee County, Oklahoma. The site was the original CN Male Seminary, which opened in 1851 and burned down in 1910. Between 1910 and 1951, this Property was used primarily as a private residence and for agricultural purposes after CN sold it. In 1961, Markoma Bible Academy opened and operated until 2002. During that time, several buildings were constructed. Stucky Hall served as a cafeteria, office space, and classrooms. CN was able to acquire the land back in September 2005 and has used several of the Property buildings for CN Offices. CN has remodeled the Markoma Gym, Girls Dorm, Boys Dorm, and the library. CN has not been able to reuse the Stucky Hall Property due to asbestos, mold, and structural issues. Stucky Hall is a two-story building of cinder block construction comprising approximately 3,000 square feet and was built in 1961. Stucky Hall had 12 homogeneous areas with 25 samples that were identified above the EPA threshold. Approximately 1,500 square feet of dark brown vinyl floor tiles, green tiles vinyl floor tiles, and tan vinyl floor tiles located throughout the upstairs area offices, and hallways. Approximately 6,300 square feet of asbestos containing fireproofing on concrete beams and joist ceilings located throughout the 1<sup>st</sup> and 2<sup>nd</sup> floors. The structure of the building is not safe.

Lost City School is located at 13243 N. Lost City Road, Hulbert, Cherokee County, Oklahoma. The site is approximately 35.65 acres that operated as a public school from 1901 until 2008 when the school was annexed due to financial and operational reasons. The site is developed with 5 buildings that include 2 school buildings, a gymnasium, a cafeteria, and a shop building. The site also includes a playground and 2 baseball fields. CN purchased the Property in January 2025. The buildings have not been used since the annexing of the school system. The exact size of the Lost City Schools is unknown but there is evidence of asbestos tiles, insulation between the older building structures, and insulation in the piping, and the roof. There are several areas where the buildings are falling down, and windows are broken. The draft site investigation did find evidence of lead-based paint in several of the rooms and in the window frames of the older windows. Mold damage is present in

every room on the property. The structure of the buildings is not safe, with several areas caved in and exposed to the open atmosphere. Both properties are currently unsafe and unusable, with contamination posing environmental and health risks. Cleanup and remediation are essential to enable reuse and prevent further deterioration.

## **Revitalization of the Target Area**

### **1.c. Reuse Strategy and Alignment with Revitalization Plans**

CN has plans to redevelop and reuse the Property at both Sites. Since acquiring the Markoma Bible Academy, CN has cleaned and redeveloped several buildings—including the gym, boys' dorm, girls' dorm, and library—into office space for tribal operations. The Stucky Hall building will be demolished, and the Site reused in a similar fashion. The Chapel has been removed, along with the Graham House and the Farmhouse. The Property where the Farmhouse once stood is being developed for housing for youth aging out of the Foster Care Program and for day houses for graduates of the drug and alcohol addiction program. CN is seeking construction funding to redevelop the Property for additional office spaces. The goal is to expand the CN Secretary of Natural Resources Department to locate all the programs on the Markoma Property. The Stucky Hall Property will be reused to create a new energy-efficient building to house several offices and the Property next to the Stucky Hall building will be developed into greenspace and expand CN's Ethnobiology Program with greenhouses and garden space to grow and preserve cultural plants from the CN Heirloom Garden, which replenishes the Seed Bank that distributes heirloom seeds to tribal citizens.

For the Lost City School Property, CN is working with the community to preserve the Site's historic significance of the site and build several single-family, energy-efficient homes with a shared community building on a portion of the Property. CN has been working with community residents and leaders on community engagement, and the local residents support the redevelopment and reuse of the Property. CN plans to remediate and reuse the gym and some of the historic structures. The former gymnasium will be redeveloped to create a community wellness center. This Property will serve as a community and cultural resilience hub, providing shelter or assistance due to extreme weather situations, with a tornado shelter on site and a place to go during emergency power outages to serve as warming and cooling stations. The wellness center will also be used to distribute water and food supplies in the case of an emergency. Additional plans are to utilize some of the property as a green space or park for residents.

### **1.d. Outcomes and Benefits of Reuse Strategy:**

Positive outcomes and benefits will include reusing underutilized Properties and creating cultural Sites with green spaces. The reuse plan will have significant outcomes by transforming underutilized Properties into vibrant community hubs. Redevelopment of the Stucky Hall and Lost City School Properties will convert abandoned structures into functional spaces that meet community needs. These projects will preserve the historic and cultural significance of the Lost City School Property while creating affordable housing (which improves the economic circumstances of individuals/families), energy-efficient housing, green spaces and parks, preservation of cultural resources, and shared community infrastructure that promote health and community engagement. The benefits of green space design, nature-based solutions, and ecosystem services of Brownfields revitalization can help mitigate the effects and stresses of chronic environmental contamination (CEC). The use of the Lost City School Property as a storm shelter will improve local resilience to the impacts of extreme weather. Cleanup and restoration efforts will reduce exposure to hazardous substances, improving air and soil quality for the surrounding communities of these Sites. Ultimately, the reuse will revitalize the Sites while improving health, safety, and economic stability for the communities affected.

CN has secured funding from the U.S. Department of Housing and Urban Development (HUD) for the Lost City School Property redevelopment initiative to be used for affordable and energy-efficient housing and community infrastructure. The Tribe is looking into additional funding sources and partnerships to help secure

funding for the community and wellness centers. Benefits of reusing this Property will also bring in new and more updated infrastructure, like building roads, utility lines, septic systems, and water lines for this area.

Analysis of Brownfields Cleanup Alternatives (ABCA) was written for both the Stucky Hall and the Lost City School properties and is referenced in the appendices and the Threshold Criteria for the Brownfields Cleanup Grant. The ABCA for Stucky Hall is to proceed with Alternate 3: full Site demolition and Site cleanup to remove the asbestos materials to ensure that the Site is safe. The ABCA for Lost City School Property is to proceed with Alternate 2: full Site demolition and Site cleanup to remove the asbestos, lead-based paint, and building materials to ensure that the Site is safe for future reuse.

## **Strategy for Leveraging Resources**

### **1.e. Resources Needed for Site Characterization**

Community Engagement Plans and Cleanup Plans are needed for the Stucky Hall and Lost City School Sites. CN will seek a vendor to conduct a reuse plan for each Property and a vendor to perform cleanup plans for Stucky Hall and Lost City School. However, Environmental Site Characterizations have been conducted, and sampling has taken place at both locations.

### **1.f. Resources Needed for Site Remediation**

CN is seeking Brownfields Cleanup Grant funding to demolish the unsafe buildings and remediate recognized environmental concerns at the Stucky Hall and Lost City School Properties. CN is confident that once the grant is awarded, no additional funds will be needed to complete the remediation at both Sites. If unforeseen costs arise, CN will work with the CN Office of the Chief/Management Resources to secure additional funding and maintain project timelines.

### **1.g. Resources Needed for Site Reuse**

The Brownfields Cleanup grant will provide assistance with the cleanup and removal of contaminated concerns at the Site. CN does not have secured funding for Stucky Hall and needs the Brownfields Cleanup grant to support the cleanup of the Site. CN is seeking funding from tribal grants, as well as from other Federal grant opportunities such as the U.S. Department of Agriculture (USDA), Federal Emergency Management Agency (FEMA), Indian Health Services (IHS), and Bureau of Indian Affairs (BIA) that may support various Site and target area efforts. CN Housing Authority has funds set aside to help with the development of the Lost City School Reuse Project. The CN Secretary of Natural Resources will work with CN Office of the Chief if additional resources are needed for the Stucky Hall Project.

### **1.h. Use of Existing Infrastructure**

Both Sites have existing infrastructure, such as public water, electricity, roads, and/or waste treatment systems. CN will account for all existing infrastructure during the Site assessments and evaluate any needs for upgrades. If there is need for additional infrastructure to complete revitalization plans, CN will provide input on available funding resources. The Stucky Hall building will reuse the existing City/Tribe's infrastructure grid. The Lost City School will require new upgrades to the existing infrastructure. CN will build new roads, waterlines, sewer lines/septic systems on and near the Lost City School property.

## **2. Community Need and Community Engagement**

### **Community Need**

#### **2.a. The Community's Need for Funding**

CN faces unique financial challenges that limit its ability to fund environmental remediation and site reuse without external assistance. As a sovereign tribal government, CN does not levy property taxes or a tax base, and property taxes are not collected on tribal lands or non-tribal lands within the reservation. This means that

funding is not available to address Brownfields Sites without financial assistance from outside sources. The city, county, and CN cannot rely on or justify raising taxes, voting to pass bonds, or to divert funds for Brownfield cleanup from existing infrastructure projects.

Both sites, Stucky Hall and Lost City School, hold significant cultural importance, yet both remain unsafe and unusable due to contamination and structural hazards. The Lost City Community, with a population of 493, has been declining in population, and no longer has the financial capacity and support to maintain the property. The Lost City Community no longer has a school; it is low-income community, and residents lack the funds to support remediation or redevelopment. The closure of the school system further reduced local resources, leaving the property abandoned and deteriorating. Similarly, the city of Tahlequah and CN do not currently have funding to clean up the environmental concerns for the demolition of the Stucky Hall Property, which is essential for expanding tribal programs and services to the community.

### **2.b. Health or Welfare of Sensitive Populations**

Vulnerable populations, including minority groups and low-income residents, live in the target areas impacted by Brownfield Sites. For example, Hulbert's population is approximately 49% White, 39% Native American, and 4% Hispanic. The community faces significant economic challenges, with a poverty rate of 23.6% and unemployment at 14.6%. Many residents rely on government assistance and have a critical need for job opportunities and housing. Vacant and abandoned properties in these areas contribute to blight, increase the risk of criminal activity, and pose environmental health hazards due to asbestos, lead-based paint, and mold contamination.

These conditions disproportionately impact sensitive populations, including children, elders, and individuals with chronic health conditions, who are more vulnerable to exposure from hazardous substances and unsafe structure. The lack of community infrastructure in Hulbert also limits access to safe recreational spaces and emergency shelters during extreme weather conditions. By addressing these concerns on these properties, this grant will reduce health threats, enhance resilience, and create opportunities for economic and cultural growth in communities that lack the financial capacity to achieve these outcomes on their own.

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

Sensitive populations face higher risks of disease such as cancer and asthma because of conditions present at Brownfield Sites in their neighborhoods. The Lost City School Property and the Stucky Hall Property located in the target areas are creating an ongoing air quality threat as the lead-based paint and asbestos from older buildings continue to decay. Many of the compounds are carcinogenic and can lead to several forms of cancer. With this grant, CN Environmental Programs (CNEP) will be able to address, identify, and facilitate the reduction of environmental threats in the selected target areas.

### **2.d. Economically Impoverished/Disproportionately Impacted Populations**

This Brownfields Cleanup Grant will help CN develop a community engagement plan and strategy planning to assist the CN in reducing threats to the community and be able to reuse the land to economically help in this underserved and impoverished community. The land has great potential to be reused and put back into service for the community, it would be easier to purchase additional land, but CN wants to create a housing community for local Cherokee citizens and build a community center to serve all the residents, tribal and non-tribal. Lost City Community has been in decline, and this grant will help revitalize the community. This grant will also help the Tahlequah Community to assist in the reuse of the Stucky Hall Property. CN has been reusing former buildings on the Markoma Property, but this has environmental threats that need to be addressed to reuse and cleanup the Property.

## **Community Engagement**

## 2.e. Project Involvement

CNEP will work with multiple CN departments and external partners to ensure successful redevelopment and reuse of the Stucky Hall and Lost City School Properties. These collaborative efforts will include Housing Authority of CN, CN Tribal Historic Preservation Office, Office of the Chief – Construction Projects, CN Financial Resources, and Lost City Community Organization. In addition, CNEP will work with City Managers, Mayors, Community leaders, Community-based Organizations and members of the community to promote meaningful community engagement. Working together will assist in identifying ways to address community needs while honoring cultural and historic significance. CN will oversee the redevelopment and reuse plans, which will be executed by the contractor.

## 2.f. Project Roles

<b>PARTNER</b>	<b>POINT OF CONTACT</b>	<b>SPECIFIC ROLE</b>
<b>Housing Authority of CN</b>	Todd Enlow, Executive Director Housing Programs, <a href="mailto:todd-enlow@cherokee.org">todd-enlow@cherokee.org</a>	Development and project oversight for Lost City School Property
<b>CN Tribal Historic Preservation Office</b>	Elizabeth Toombs, Tribal Historic Preservation Officer, <a href="mailto:elizabeth-toombs@cherokee.org">elizabeth-toombs@cherokee.org</a>	Will ensure the consideration and protection of cultural resources.
<b>CN, Office of the Chief</b>	Jonathan Asbill, Senior Administrator Construction Project, <a href="mailto:jonathan-asbill@cherokee.org">jonathan-asbill@cherokee.org</a>	Development and implementation of cleanup oversight and redevelopment initiatives.
<b>CN Financial Resources</b>	Patricia Cordova, Acquisition Management Contract Officer, <a href="mailto:patricia-cordova@cherokee.org">patricia-cordova@cherokee.org</a>	Will assist with the procurement of bids for vendors and contract services.
<b>Lost City Community Organization</b>	Sharon Gifford, (918) 931-1637, Lost City Community Outreach Leader	Meeting space and support with community engagement in the Lost City Community.

## 2.g. Incorporating Community Input

Community input occurred via public meetings and notifications on the CN website. CN conducted two community meetings to engage the community about applying for this grant. The public meeting for the Stucky Hall Building was held at 9:00 AM CST on January 8, 2026, in the CN Natural Resources conference room located on the Markoma Campus. The physical address is 886 Markoma Drive, Tahlequah, OK 74464. Six participants were in attendance. All six participants were in favor of CN applying for a Brownfields Cleanup Grant to remediate both Sites.

The public meeting for Lost City School was held at 2:00 PM CST on January 8, 2026, at the Lost City Community Center, located at 13251 N. Lost City Road, Hulbert, OK 74441. Only one resident attended the meeting; she is a community leader for the Lost City Community. This participant was more interested in the Lost City School Property and was very supportive of CN to apply for the Brownfields Cleanup Grant to remediate the Properties, especially the Lost City School Property. The Lost City Community has been working with CN and has expressed great concern about preserving the Property's historical features while reusing the site. Markoma Properties, which include Stucky Hall, has community input from local residents and staff from tribal offices who work in adjacent buildings.

Feedback and questions can be addressed at future public meetings, and residents can submit any concerns to the project manager at any time by email or phone. CNEP will conduct community engagement in the target

areas, including community meetings, advertising for community meetings, educational outreach, and updating CN/Inter-Tribal Environmental Council (ITEC) Website Brownfields Program. Staff will provide the public with opportunities to provide feedback and ask questions. CNEP will inform the public about cleanup and reuse plans, and staff will share both plans with community participants and community leaders. Staff will provide updates and information as needed. Website updates will be made on a quarterly basis. Public meetings will take place once a year at both locations during the duration of the grant (minimum eight (8) community meetings, two (2) per year for four (4) years).

**3 Task Descriptions, Cost Estimates, and Measuring Progress**

**3.a. Proposed Cleanup Plan**

The proposed cleanup plan for both properties will allow each property to be cleaned up and redeveloped, while mitigating the contamination and environmental concerns that impact human health and the environment. Both sites contain asbestos-containing materials (ACMs), and the Lost City School also has several areas of lead-based paint. Abatement of interior ACMs will take place with containment under negative air pressure and wet method to assist with containment of friable materials. CN Brownfields Staff and the contractor will complete a visual clearance to ensure that asbestos materials have been removed. Asbestos waste will be accepted and disposed of at a landfill facility that accepts ACMs. Both properties have major concerns of structure damage, that also posed additional threats to safety. Several buildings at the Lost City School and the Stucky Hall have been impacted by structural failure. The cleanup for both sites will be conducted by a certified contractor that will perform cleanup activities. The bid process for hiring the selected contractor will follow CN Policies and Procedures and Federal procurement policies. CN Brownfields Staff and CN Management Resources Staff will oversee cleanup activities conducted by the contractor.

**Description of Tasks/Activities and Outputs**

<b>TASK 1: Project Implementation &amp; Oversight</b>
<p><b>b. Project Implementation:</b></p> <ul style="list-style-type: none"> <li>• Cooperative Agreement Grant Management: CNEP will complete required progress reports, manage in-house databases, and maintain and update ACRES. Staff will ensure that all reporting requirements are met and create a budget.</li> <li>• Grant Oversight: Grant management procurement and oversight; working with the selected contractors for cleanup activities; CNEP will meet with CN, city and/or community officials to discuss outreach efforts, sites, community engagement plans and other necessary phases of this grant that directly involve their partnership.</li> <li>• CNEP will provide a monthly grant update to Secretary of Natural Resources (SONR)/CNEP throughout the project timeline.</li> </ul>
<p><b>c. Anticipated Project Schedule: Duration of the Grant (4 Years Total)</b></p> <p>Grant Project Implementation will take place over the course of 16 quarters (4 years). Grant oversight and project management will take place from the beginning to the final closeout of the grant. Reporting requirements will occur quarterly, semi-annually, or annually based on EPA’s reporting request, throughout the full timeline of the grant. Project planning, procurement bid processing, selection of the vendors, and all preparation activities will take place within the first 4 quarters (Year 1).</p> <p><i>Anticipated project schedule is based on the procurement bid process and selection of the contractor.</i></p>
<p><b>d. Task/Activity Lead:</b> CNEP (applicant), will act as lead, with assistance from CN Management Resources Staff.</p>
<p><b>e. Outputs:</b> Workplan, database, and ACRES management, Quarterly, Semi-annual, or Annual and Final Reporting, in addition Closeout reporting. Planning and coordination activities, budget and financial drawdowns/budget reconciliations, and submit documents to EPA.</p>

## **TASK 2: Community Engagement/Outreach**

**b. Project Implementation:** CNEP will conduct community engagement with the target areas. The CN ITEC Website will provide project updates, and act as a resource file to obtain information on ABCAs, Community Engagement Plans, Public Notices, Factsheets, and reference materials.

**c. Anticipated Project Schedule:** Public meetings and community engagement activities will take place throughout the duration of the grant timeline (1 –16 quarters). Website updates will be made on a quarterly basis. Public meetings will take place once a year at both locations during the duration of the grant (minimum 8 community meetings (2 per year for 4 years).

**d. Task/Activity Lead:** CNEP Brownfields Staff will act as lead.

**e. Outputs:** Two (2) public meetings a year, with a total of a minimum of eight (8) meetings with community outreach for the duration of the grant. Monthly updates to CN Secretary of Natural Resources and Management Officials. Website updates for the public with current materials and progress reports for the meetings. Community engagement will be ongoing and active throughout the duration of the grant, where the community can provide comments, feedback and ask questions anytime.

## **Task 3: Site Cleanup Planning/Remediation/ Post Cleanup**

**b. Project Implementation:** Site Cleanup Planning activities will take place with CNEP, CN Management Resources and CN Housing Authority. Cleanup planning will finalize the ABCA documents, city approvals, selection of vendor from bids from cleanup contractors. Remediation – the selected contractor will participate in planning meetings with CN Department Staff, Site preparation, Site demolition, and cleanup. Post Cleanup - Cleanup monitoring, post contamination removal action report, and CN staff will conduct final sampling and post closure procedures.

**c. Anticipated Project Schedule:** Quarters 1 – 16, the duration of the grant. Site Cleanup Planning will take place mainly in the first year (Quarters 1 – 4), Remediation will occur in years 2 and 3 (Quarters 5 – 12), Post Cleanup and monitoring activities will occur in year 4 (Quarters 13 – 16).

**d. Task/Activity Lead:** CN Brownfields Staff and CN Management Resources Team will act as lead.

**e. Outputs:** Site Cleanup Planning activities include finalizing 2 ABCA Documents, bid process and selection of the contractor, and contracts with CN and the Vendor.

Remediation - Site Cleanup at Stucky Hall and the Lost City School, cleanup activities for the removal of asbestos, lead-based paint, abatement of the Lost City School that will be preserved for historical purposes, and properly disposal activities.

Post Cleanup – Monitoring of both projects and finalized post contamination removal action report. ACRES reporting, waste manifest and payment of the final invoices. Last Public Community Meeting and address comments before final wrap up of both projects.

## **Task 4: Site Cleanup and Reuse Plans**

**b. Project Implementation:** CNEP will work with CN Procurement Office to assist with the procurement of bidding and selecting an Environmental Professional Contractor to write up a Community Engagement Plans for both the Stucky Hall Property and the Lost City School Property. The selected contractor will also write a Cleanup Plan for both the Stucky Hall building and Lost City School Property. Four reports will be written for these Properties for CN and Community Members impacted by the projects. These reports will

help with community engagement, site preparation, planning activities for cleanup activities, and site remediation and cleanup.
<b>c. Anticipated Project Schedule:</b> 2 Cleanup Plans and 2 Community Engagement Plans will be written and completed within the first 2 years (Quarters 1 – 8).
<b>d. Task/Activity Lead:</b> CNEP Brownfields Staff and CN Procurement Staff will act as lead.
<b>e. Outputs:</b> 4 Reports Total – 2 Community Engagement Plans prepared by the selected contractor for the Stucky Hall and Lost City School Properties and 2 Cleanup Plans to be prepared by the contractor for the Stucky Hall and Lost City School Properties.

### 3.f. Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		(Task 1)	(Task 2)	(Task 3)	(Task 4)	
Direct Costs	Personnel	88,607.55	103,013.61	66,939.71	-	258,560.87
	Fringe Benefits	26,810.54	31,169.47	20,254.36	-	78,234.37
	Travel	-	-	-	-	-
	Equipment	-	-	-	-	-
	Supplies	-	-	-	-	-
	*Contractual	-	-	689,065.00	40,000.00	729,065.00
	Construction	-	-	-	-	-
	Other	-	-	-	-	-
Total Direct Costs		115,418.09	134,183.08	776,259.07	40,000.00	\$1,065,860.24
Indirect Costs* (5%)		5,770.90	6,709.15	4,359.70	-	16,839.76
<b>Total Budget</b>						
(Total Direct Costs + Indirect Costs)		121,188.99	140,892.23	780,618.77	40,000.00	1,082,700.00
* Contractual amounts are not subject to Indirect Costs.						
Budget Justification: 1) Tasks are broken out for 4 years: Salary and Fringe \$88,607.55 with Fringe \$26,810.54 for Task #1; Task #2 \$103,013.61 and Fringe \$31,169.47; and Task #3 Salary \$66,939.71 and Fringe \$20,254.36). No funding requested for travel, equipment and supplies. Contractual estimates: \$144,315 for Stucky Hall and \$584,750 for Lost City School; which will include demolition, asbestos cleanup, restoration of the gym and the main historical building of the Lost City School. Task #4 Contractual includes 2 Community Engagement Plans (\$10,000 each) and 2 Cleanup Plans (\$10,000 each) Total Contractual: \$729,065.00).						

### 3.g. Plan to Measure and Evaluate Environmental Progress and Results

Project Planning/Monitoring/Permitting Outputs – measurement of project planning will be directed toward the completion of reuse and cleanup plans for both Properties. Finalize both ABCA Reports, workplan development and procurement and selection process to enter into a contract with the selected contractor. Monitoring will include status updates to management, progress reports to EPA. Brownfields Staff will monitor the timeline and project schedule for completion. Confirmation sampling will occur during the monitoring phase and after the cleanup has been conducted. Permitting will include working with City officials for permit approvals as needed. Cleanup/remediation Outputs – Site Status updates and reporting to management, ACRES reporting, waste manifest and analytical reports from soil sampling activities and cleanup activities.

Community Engagement Outputs – CN Environment Programs will have public community meetings in each TA each year throughout the duration of the grant. Community engagement will take comments, questions and feedback from CN Tribal Citizens and local residents.

Post Cleanup outputs – the main goal of post cleanup is to get both Sites ready for reuse and redevelopment. Staff will create a project timeline and provide status updates to CN Management and to members of the public.

#### **4. Programmatic Capability and Past Performance**

##### **Programmatic Capability**

##### **4.a. Organizational Structure and Description of Key Staff**

As a tribal government involved in numerous grant projects, cooperative agreements, and contracts, CN has the administrative, legal, and financial experience and infrastructure to comply with all applicable laws and regulations regarding the receipt of funds and grant management. CN's Contracts department and the Office of the Attorney General review all contracts and legal agreements. CN policies and procedures cover all aspects of accounting for grant funds: Accounts Payable, Budgets, Financial Systems, Internal Controls, Payroll, Travel, Cash Management, and Grants Management. CN reviews all policies and procedures for update on an annual basis. CNEP receives a variety of support services from other divisions, departments, and offices of the CN. Such support services include the CN's office of Acquisition Management. Acquisition Management works with the CNEP to ensure that items (such as sampling equipment) and services (such as laboratory and other contractor services) procured for the CNEP meet data quality requirements. CNEP can ensure successful completion of all required aspects of this project and grant by management of CN Grant Services, which is a model for compliance to law and regulation while providing speedy responses to programmatic needs. CNEP Brownfields Program has received funding since 2002. As a result of EPA funds, CNEP has enrolled 65 Sites in the Brownfields Program.

Key staff qualifications for CN to manage the response program and/or the process is as follows: Positions of management that manage CN Staff and that are involved in the hiring of new staff include: The Senior Director, Directors, and Managers. These positions must have a Bachelor's degree from a four-year college or university and no less than 9 years of experience. Below is the key staff that will be involved in this Project, along with their roles, expertise, qualifications and experience.

##### **Jason White – Environmental Director**

Jason White has been with CN 29 years and has a B.S. in Environmental Management and Safety Management, as well as an M.S. in Industrial Management. Jason will serve as the program director. *Certifications: Registered Environmental Specialist, Registered Sanitarian, 40 Hour HAZWOPER, Certified Floodplain Manager.*

##### **Sheila Sevenstar-Horn – Environmental Specialist IV**

Sheila Sevenstar-Horn has been with CN 30 years and has a B.S. in Microbiology. Sheila will assist with the logistics of the trainings and workshop. She will complete all required progress reports for this project and maintain tracking databases for Brownfield sites. *Certifications: Registered Environmental Specialist, Registered Sanitarian, 40 Hour HAZWOPER, Asbestos Inspector, Certified Lead-Based Paint Inspector/Risk Assessor.*

##### **Karen Dye – Environmental Specialist IV**

Karen Dye has been with CN for 18 years and has a B.A. in Geography. Karen will be the primary coordinator for the workshop and trainings. She will assist with the logistics and agenda development. *Certifications: Registered Environmental Specialist, Registered Sanitarian, 40 Hour HAZWOPER, Asbestos Inspector.*

#### **4.c. Acquiring Additional Resources**

CNEP has received 128(a) Brownfields grant funding since 2002 and anticipates continued funding. CNEP has access to work with other CN Staff from Housing Authority, Commerce, Cultural and Community Outreach Departments, along with lead-based paint and asbestos programs. CNEP will work with CN Procurement and Contracts Department to bid out and procure a contractor to perform assessment activities. CN will follow federal procurement regulations in acquiring contractors. CNEP has also worked with the Oklahoma Department of Environmental Quality (ODEQ) and the Oklahoma Corporation Commission (OCC) on various projects in the past.

#### **Past Performance and Accomplishments**

##### **4.d. Currently Has or Previously Received an EPA Brownfields Grant**

CNEP has received annual funding under the Brownfields 128(a) grant since 2002. CNEP Tribal Response Grant has been used to work towards achieving the goals of developing and implementing an inventory of Brownfield sites and providing opportunities for public participation. The goals and objectives have been in compliance with the work plan, schedule, and terms and conditions for our cooperative agreements. CN uses ACRES and maintains updates on a regular basis. CNEP currently has Brownfields 128(a) and Bipartisan Infrastructure Law (BIL) grants. For FY25, three (3) Phase I ESAs and 1 Phase II Asbestos Containing Materials (ACMs) Survey for the Brownfields 128(a) were completed. Under the BIL, CNEP completed two (2) Phase II analytical reports. Accomplishments of the Brownfields 128(a) include conducting Phase I ESAs for Inter-Tribal Environmental Council (ITEC) Member Tribes and also provided services to perform Phase II ESAs. Cherokee Nation is the Lead Tribe that supports the ITEC Consortium, which consists of 46 Tribes in the EPA Region 6 area (Oklahoma, New Mexico, Texas, and Louisiana). With this grant, the Brownfields Program was able to provide a Phase I ESA Training. Staff provided technical assistance on Brownfields-related topics to ITEC Member Tribes. Accomplishments for the Brownfields BIL Grant include hosting an ASTM Training for Tribes and a Tribal Brownfields Roundtable Meeting, and creating educational videos for Brownfields to showcase CN Brownfields Site success stories and educate communities on what a Brownfields Program is for educational outreach.

CN has been receiving Brownfields 128(a) funding for over 20 years, Brownfields BIL funding for FY23 and FY25 2 years and a Community Wide funding for 2 years. All Brownfields 128(a) funding that CN Brownfields Program has received in previous years has been expended. Currently, there is new Brownfields 128(a).

#### **Compliance with Grant Requirements**

CN Brownfields Program has been in compliance and expected results have been achieved during the timeframe for all 3 Brownfields Grants. Quarterly and Semi-Annual performance reports and grant deliverables have been completed and submitted on time. The CN Brownfields Program enters information into the ACRES and updates new information as the projects are completed. Staff works closely with EPA Brownfields Project Officers regularly, regarding any workplan, budget modifications and obtain approval for all Project Eligibility Determinations for sites before work starts for assessment activities. CN Brownfields Programs has established a Brownfields inventory database and updates the Public Record.

## **Threshold Criteria for Brownfield Cleanup Grants**

### **1. Applicant Eligibility**

- a. Cherokee Nation is applying for the Brownfields Cleanup Grant as a federally recognized tribe, and as such is eligible for funding.
- b. As a federally recognized tribal government, Cherokee Nation is not subject to federal taxation.

### **2. Previously Awarded Cleanup Grants**

Cherokee Nation was previously awarded a Cleanup Grant for the Saline Courthouse in the amount of \$124,800 for the project period July 1, 2008 – September 20, 2009. The Brownfields Cleanup Cooperative Agreement (BF 96674401) assisted Cherokee Nation with remediating the Saline Courthouse for lead-based paint removal.

Cherokee Nation affirms that the proposed sites have not received funding from a previously awarded EPA Brownfields Cleanup Grant.

### **3. Expenditures of Existing Multipurpose Grant Funds**

Cherokee Nation affirms that it does not have an active EPA Brownfields Multipurpose Grant.

### **4. Site Ownership**

Cherokee Nation is the current and sole owner of the proposed sites. Stucky Hall is part of the Markoma Campus that was purchased by Cherokee Nation in September 2005. Lost City School was acquired by Cherokee Nation in January 2025.

### **5. Basic Site Information**

Stucky Hall  
886 Markoma Drive  
Tahlequah, Oklahoma 74464

Lost City School  
13243 N Lost City Road  
Hulbert, Oklahoma 74441

### **6. Status and History of Contamination at the Site**

Stucky Hall was part of the original Cherokee Nation Male Seminary, which opened in 1851 and burned down in 1910. Between 1910 and 1951, after Cherokee Nation sold the property, the Subject Property was used primarily as a private residence and for agricultural purposes. In 1961, Markoma Bible Academy opened and operated until 2002. During that time, several buildings were constructed. Stucky Hall served as the cafeteria, office space, and classrooms. Cherokee Nation was able to acquire the land back and has used several of the property buildings for Cherokee Nation Offices. Cherokee Nation has renovated the Markoma Gym, Girls Dorm, Boys Dorm, and the library. Stucky Hall has not been reused due to the presence of asbestos, mold, and failing structural issues.

Lost City School opened in 1901 and operated nearly 107 years before it was forcibly annexed to bordering districts by the Oklahoma State Board of Education due to financial and operational issues. The school was significant to the community because it constituted an economic resource- it provided jobs and wages for local families. The school had a strong Native American student body. Cherokee Nation acquired the Lost City School property in January 2025. The school was closed in 2008 and has not been reused since. Due to the age of the buildings, structural issues and contaminants such as lead, asbestos-containing material, and mold exist.

**Community Need:** The acquisition addresses a long-standing need for community space and revitalization in the Lost City area.

**Cultural Connection:** Both Stucky Hall and the Lost City School properties have deep ties to the Cherokee people, with the tribe having previously supported the school and are now bringing it back under their purview. Cherokee Nation has been reusing the Markoma Bible Academy Property, with the exception of the Stucky Hall due to environmental concerns.

**Future Plans:** Cherokee Nation, through its businesses and community initiatives, will assess both sites for future uses that benefit the community and honor its history. Currently, Cherokee Nation Housing Authority is looking to redevelop the Lost City School into a residential community, with a wellness center, storm shelter, playground for residents, and greenspace. Cherokee Nation Office of the Secretary of Natural Resources is looking at funding options to reuse and redevelop the Stucky Hall Property. Currently the plan is to build offices, greenspaces, and a greenhouse to assist with the Cherokee Nation Heirloom Seedbank Initiative.

## **7. Brownfield Site Definition**

Cherokee Nation affirms that the proposed sites are not listed or proposed for listing on the National Priorities List; are not subject to unilateral administrative orders, court orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; are not subject to jurisdiction, custody, or control of the U.S. Government.

## **8. Environmental Assessment Required for Cleanup Grant Application**

The following site assessments have been completed:

### Stucky Hall:

A Phase I ESA dated August 19, 2005, that included the Stucky Hall Building.

A Phase II ESA dated March 1, 2010, that included the Stucky Hall Building.

### Lost City:

Phase I ESA was completed in January 2025 for Lost City School.

Site Investigation is in draft form with testing for lead-based paint and asbestos.

## **9. Site Characterization**

- a.** Cherokee Nation affirms that there is sufficient level of site characterization and data from inspections and/or the onsite collections for remediation work to begin on the proposed sites.

*Stucky Hall* - Cherokee Nation affirms that there is sufficient level of site characterization and data from the environmental site assessment performed to date for the remediation work to begin on the site.

*Lost City* - Cherokee Nation affirms that there is sufficient level of site characterization and data from inspections and the collection of lead-based paint and asbestos found onsite.

## **10. Enforcement or Other Actions**

Cherokee Nation affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the sites for which Brownfields Grant funding is sought.

## **11. Sites Requiring a Property-Specific Determination**

Cherokee Nation affirms that the proposed sites do not require property-specific determination to be eligible for EPA Brownfields Grant funding.

## **12. Threshold Criteria Related to CERCLA/Petroleum Liability**

**a.i.1.** Cherokee Nation affirms that it is a federally recognized tribe and therefore exempt from demonstrating a CERCLA liability defense.

## **13. Cleanup Authority and Oversight Structure**

- a.** The Stucky Hall Building and Lost City School are enrolled in the Tribal Response Program to ensure the protection of human health and the environment. Cherokee Nation Environmental Programs has environmental professionals on staff, and they plan to hire a qualified environmental contractor to implement remediation activities. The contractor will provide the technical expertise required to conduct, manage, and oversee the cleanup. Cherokee Nation will comply with competitive procurement provisions of 2 CFR §§ 200.317–200.327 and ensure that this technical expertise is in place prior to beginning cleanup activities.
- b.** Access to adjacent properties will not be required for the cleanup of the sites.

## **14. Community Notification**

- a.** Cherokee Nation announced intent to apply for Brownfields Cleanup funding and proposed development on January 8, 2026 via public notice posting. The notice, announcing two public meetings for each site, was posted on Cherokee Nation's website ([www.cherokee.org](http://www.cherokee.org)) along with the contact information for questions and comments. The Stucky Hall and Lost City School ABCAs were handed out and discussed at each meeting. Cherokee Nation Environmental Programs also created an online resource on the Cherokee Nation ITEC Webpage ([www.itec.cherokee.org/programs/brownfields-response-program](http://www.itec.cherokee.org/programs/brownfields-response-program)) for the Brownfields Cleanup Grant that contain the two ABCAs, Public Notice, and will additionally serve as a resource for the public to stay informed and engaged throughout the life of this project.
- b.** A public meeting was held for each site on January 8, 2026, and the community notification ad was published prior to submitting the cleanup grant application on the Cherokee Nation's website. A draft grant application and the ABCAs were made available for the public to review and comment.

- c. An in-person public meeting was held for each site. The public meeting for the Stucky Hall Building was held at 9:00 AM CST in the Cherokee Nation Natural Resources Conference Room located at the Markoma Campus. The physical address is 886 Markoma Drive, Tahlequah, OK 74464. The public meeting for Lost City School was held at 2:00 PM CST at the Lost City Community Center, located at 13251 N. Lost City Road, Hulbert, OK 74441.
- d. The following community notification documents are included as an attachment to this proposal:
  - Copies of the draft ABCAs.
  - Copy of the ad that demonstrates notification to the public and solicitation for comments on the application and that the notification to the public occurred 14 days before the application was submitted to the EPA.
  - Comments received – Everyone was in support of Cherokee Nation applying for Brownfields Cleanup Funds. No objections were received.
  - Responses to those public comments – NONE REQUIRED. Favorable response.
  - Meeting notes from the public meetings.
  - Meeting sign-in sheets/participant lists.

**15. Contractors and Named Subrecipients**

Not applicable.