

# Fort Belknap Indian Community

R08-26-C-015



Fort Belknap Agency  
656 Agency Main Street  
Harlem, Montana 59526-9455  
PH: (406) 353-2205  
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Fort Belknap Indian Community  
(Tribal Govt.)  
Fort Belknap Indian Community  
(Elected to administer the affairs of the community and  
to represent the Assiniboine and the Gros Ventre  
Tribes of the Fort Belknap Indian Reservation)

## Fort Belknap Indian Community FY26 Brownfields Cleanup Grant Application Narrative Information Sheet

1. Applicant Identification: Fort Belknap Indian Community (FBIC)  
656 Agency Main Street  
Harlem, Montana 59526-9455
2. Website URL: <https://ftbelknap.org>
3. Funding Requested:  
**Grant Type:** Single Site Cleanup  
**Federal Funds Requested:** \$870,000.00
4. Location:  
City: Fort Belknap Agency  
County: Blaine County  
State: Montana  
Reservation: Fort Belknap Indian Reservation  
Ownership: Tribally owned lands
5. Property Information:  
Former Commodities Building  
2222 Food Farm Avenue  
Fort Belknap Agency, MT 59526  
  
\*\*\*See site figure, attached\*\*\*
6. Contacts:  
**Project Director:**  
Ina L. Nez Perce – Environmental Manager  
Fort Belknap Indian Community (FBIC)  
656 Agency Main Street, Harlem, MT 59526  
406.353.8429  
[inperce@ftbelknap.org](mailto:inperce@ftbelknap.org)  
  
**Chief Executive/Highest Ranking Elected Official:**  
Randall Werk Sr. – Tribal Council President  
Fort Belknap Indian Community (FBIC)

656 Agency Main Street, Harlem, MT 59526  
 406.353.8310  
[randall.werk@ftbelknap.org](mailto:randall.werk@ftbelknap.org)

7. Population (source: [www.census.gov](http://www.census.gov))

Fort Belknap Indian Community has 4,330 enrolled tribal members who live on or near the Reservation. The town of Fort Belknap Agency has a population of 1,567 people.

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 site(s) is impacted by mine-scarred land.   | NA            |
| 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.  | NA            |
| 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). | NA            |
| The proposed site(s) is in a federally designated flood plain.   | NA            |
| The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.   | 3             |
| The reuse of the proposed site(s) will incorporate energy efficiency measures.   | 3             |
| The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.   | 3             |
| The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.   | NA            |

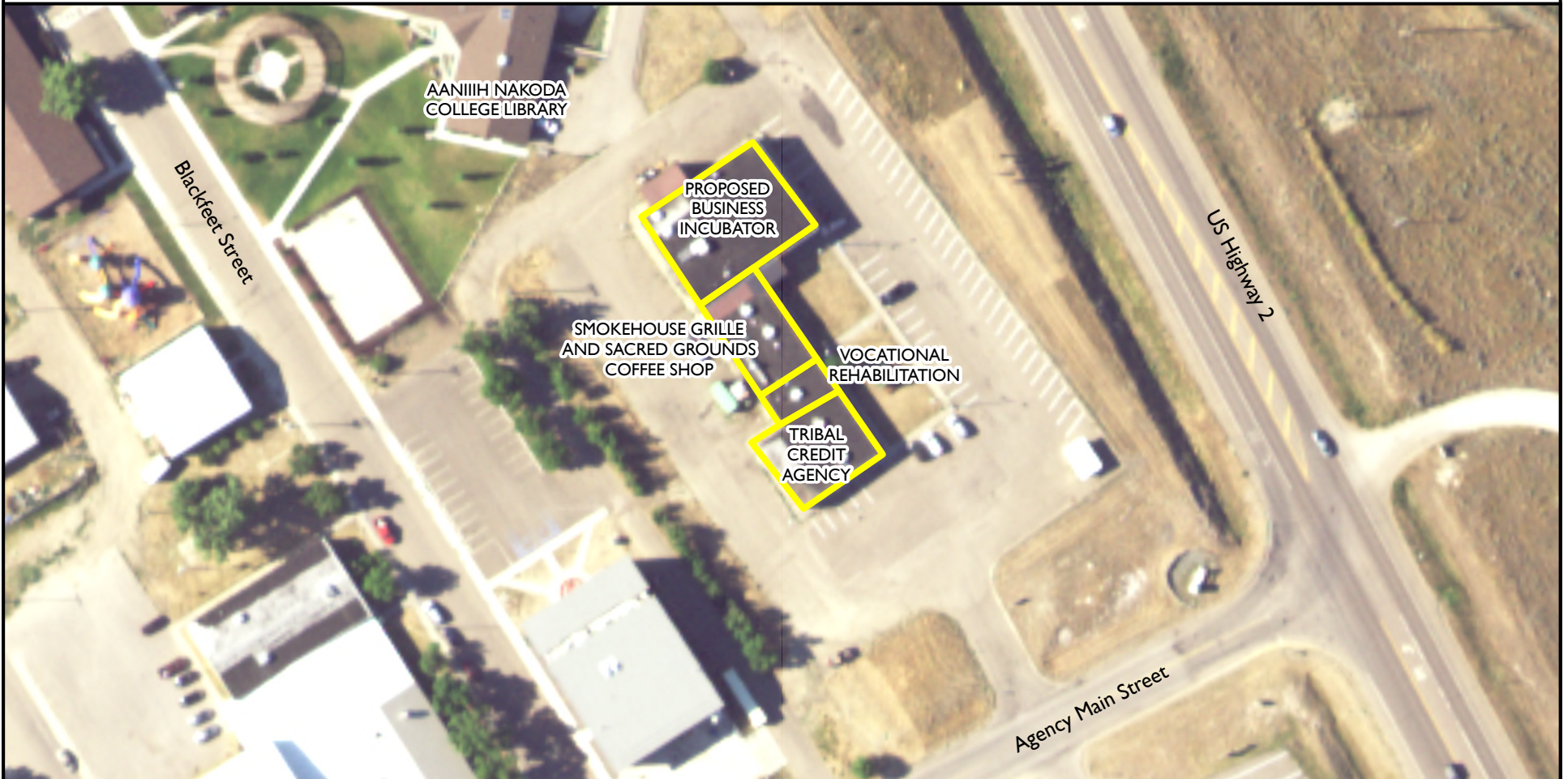
9. Releasing Copies of Applications

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

**Narrative Information Sheet Attachment**

Map of Proposed Site

Figure 1 - Commodities Building Site Map  
Fort Belknap Indian Community  
Agency, Montana



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## **Narrative and Ranking Criteria**

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (55 points)**

### **Target Area and Brownfields (15 points)**

#### **1.a. Overview of Brownfield Challenges and Description of Target Area (5 points)**

The Fort Belknap Indian Community (FBIC) is applying for an \$870,000 cleanup grant for the Former Commodities Building located in Fort Belknap Agency on the Fort Belknap Indian Reservation. Established in 1888, the Fort Belknap Indian Reservation (Reservation) is home to the Gros Ventre (*Aaniiih*) and Assiniboine (*Nakoda*) Tribes. Together, the tribes have formed and maintained a community that has a deep respect for its land, culture, and heritage. FBIC has 8,660 enrolled tribal members, and the Fort Belknap Reservation has a total population of 3,382 residents.<sup>1</sup> The Reservation encompasses 700,000 acres approximately 40 miles south of the Canadian border in north central Montana. Historically, the Aaniiih and Nakoda were nomadic hunters and warriors following the buffalo, which provided our people with the necessities of life. Today, the main industry on the Reservation is agriculture, including small cattle ranches, irrigated alfalfa fields, and dry-land farming. In addition to agriculture, we are investing in products and services that cater to the 12 million tourists that visit Montana each year. The target area for our brownfield cleanup activities includes the community of Fort Belknap Agency (Agency), the largest of four communities within the Reservation boundary and the location of the Former Commodities Building. The Agency has a population of 1,567 people<sup>2</sup> and is the home of the Tribal Government, primary Tribal services, and Aaniiih Nakoda College.

Brownfields sites are prevalent throughout our Reservation in the form of vacant and blighted homes and tribal buildings, informal dumping grounds, former gas stations, cattle dip vat stations, and automobile and equipment repair facilities. Life on our reservation is difficult due to persistent poverty and our isolated and remote location. Our tribal government and residents do not have the funds to maintain, renovate, or clean up contaminated properties on our reservation. As a result, numerous buildings sit vacant and lands suspected of legacy contamination remain unaddressed. Despite our challenges, we are hopeful and committed to a better future, which will be realized in part through redevelopment of Brownfield sites to serve the needs of our people and provide education, access to capital, jobs, and new ways to bring our products and services to market. Award of an EPA Brownfields Cleanup Grant will allow FBIC to create a new business incubation facility to offer 8-10 business bays for tribal entrepreneurs and artists, create new office space and economic development opportunities for small business development counseling and loans, offer job training to individuals with disabilities, and expand our one and only sit-down restaurant. The cleanup of the Former Commodities Building will also improve our quality of life by attracting tourism revenue for the tribes and income for our people.

#### **1.b. Description of the Proposed Brownfield Site(s) (10 points)**

FBIC will use EPA Brownfield Cleanup Grant funding to abate the Former Commodities Building in Fort Belknap Agency. A Phase II Environmental Assessment was completed on the building in November 2023 and confirmed the presence of asbestos throughout the 19,800 square-foot building. The building is located at 2222 Food Farm Avenue in Fort Belknap Agency along US Highway 2, one of the main thoroughfares running east to west across northern Montana. It is located on approximately 1.6 acres of trust land owned by the tribes. The Former Commodities Building is made up of two attached structures. The northern structure is a two-story, unoccupied 12,800 square-foot building known as the Food Distribution Program Building. This structure was historically

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<sup>1</sup> [https://data.census.gov/profile/Fort\\_Belknap\\_Reservation\\_and\\_Off-Reservation\\_Trust\\_Land,\\_MT?g=2500000US1150](https://data.census.gov/profile/Fort_Belknap_Reservation_and_Off-Reservation_Trust_Land,_MT?g=2500000US1150)

<sup>2</sup> [www.census.gov](http://www.census.gov)

operated by the US Department of Agriculture (USDA) Indian Commodities Program. Produce and other commodities were stored in the building until August 2023, when the structure became a public safety hazard due to mold and asbestos-containing materials. FBIC was forced to move its Food Distribution Program to a different building on the Reservation. FBIC wants to renovate the former Food Distribution Program structure to create a business incubation center with 8-10 new business bays but cannot move forward without funding for abatement.

The second, adjoining structure to the south is a single-story, 7,000 square-foot building that previously operated as the Social Services (Child Welfare) Department, the Fort Belknap Credit Agency, and the Smokehouse Grille and Sacred Grounds Coffee Shop. The building has fallen into disrepair, and the Social Services Department was forced to relocate due to health and safety concerns. Mold and asbestos were also confirmed throughout this structure. The Credit Agency and Smokehouse Grille would like to expand their operations and the Vocational Rehabilitation Program would like to move in, but renovation cannot occur until abatement is completed.

### **Revitalization of the Target Area (20 points)**

#### 1. c. Reuse Strategy and Alignment with Revitalization Plans (10 points)

The redevelopment of the Former Commodities Building aligns with FBIC's 2025 Tribal Strategic Focus document as well as our EDA-approved 2026-2030 Comprehensive Economic Development Strategy (CEDS). One of the primary goals highlighted in the 2025 Strategic Focus plan includes "Training and Capacity Building: invest in training and capacity building to equip tribal members with the skills and knowledge needed to succeed in the workforce and contribute to the community." One of the action steps to achieve this goal includes offering training programs in financial literacy and entrepreneurship, which is what the Fort Belknap Credit Agency will offer once the building renovation is complete. The FBIC CEDS identifies the tribes' top goal as a "Healthy Community and Improved Quality of Life". Redevelopment of the Food Distribution Center as a business incubation facility will allow more opportunities for the tribes and our entrepreneurs to capitalize on the Montana tourism base. FBIC's second goal is "Support Economic Opportunity and Enhance Local Capacity". A 2020 FBIC study shows 70% of consumer spending takes place outside the regional economy. Redevelopment of the Commodities Building will allow for greater economic opportunity and local capacity through its business incubation center, credit agency services and trainings, and the expansion of the Smokehouse Grille and Sacred Ground Coffee Shop. The FBIC Strategy Committee is optimistic that nurturing an entrepreneurial ecosystem will help alleviate a long history of poverty, unemployment, and dependency.

The public and project partners have been included in discussions regarding the proposed redevelopment of the site for the past 18 months, and a cost-benefit analysis was developed by an architectural firm to evaluate redevelopment options for the site. The FBIC Planning Committee meets with the Tribal Council each month to discuss plans for the redevelopment of the Former Commodities Building, and all meetings are publicly broadcast live and open to the public. A public meeting was also held on January 7, 2026 to discuss redevelopment plans for the site in preparation for this application.

#### 1.d. Outcomes and Benefits of Reuse Strategy (10 points)

The cleanup and redevelopment of the Former Commodities Building will lead to increased economic development, job creation, and local resilience to extreme weather events and natural disasters. Once renovated, the Former Commodities Building will offer a new business incubation and tribal shopping center where local entrepreneurs and artists can sell their goods and services. According to the FBIC Planning Department, there are over 60 small, active businesses on the Reservation that currently have no access to office space or storefronts. FBIC plans to offer free and graduated rent to business owners to help them get established. Redevelopment of the Commodities Building will also result in the expansion of the Fort Belknap Credit Agency, which offers

personal short-term loans to tribal members, agricultural and small business loans, and financial literacy education through certified instructors. The expansion will allow the credit agency to have more space for classes to teach skills such as developing spending plans and budgets, understanding credit, building credit, and native homeownership. The credit agency will install an ATM and cash checks for tribal members, services not currently available on the Reservation, and will counsel tribally owned businesses in the business incubation center. Once cleanup and remodel are complete, the Vocational Rehabilitation Program plans to relocate to the remodeled building. The program helps people with disabilities find meaningful employment through job training and counseling and supports them in starting their own businesses. Renovation of the Commodities Building will also allow for improvements and expansion of the Smokehouse Grille, the only sit-down restaurant located on the Reservation. Once the building is renovated, the tribes plan to install a walk-in cooler and freezer, which will allow the restaurant to keep more inventory on hand. The Grille currently only serves lunch, and the kitchen expansion will allow the owners to offer breakfast and dinner, creating 7 additional jobs and attracting more tourists in need of a quality meal. Redevelopment of the Former Commodities Building will help FBIC become more resilient to extreme weather events and natural disasters by creating a local supply chain, where tribal entrepreneurs are able to respond to immediate needs on the Reservation. The additional revenue generated from increased tourism sales will also provide the tribes and our members with more disposal income to utilize in the event of emergency. The remodeled building will feature energy efficient lighting fixtures, plumbing, and insulation. The tribes are researching whether solar panels may be an option for the new roofing system and would like to add them to the remodel if financially feasible.

### **Strategy for Leveraging Resources (20 points)**

#### 1.e. Resources Needed for Site Characterization (5 points)

Asbestos and universal wastes have been fully characterized at the Former Commodities Building. If additional site characterization is needed for a lead-based paint evaluation, FBIC plans to use our FY26 Infrastructure Investment and Jobs Act (IIJA) funding available through our 128(a) program. FBIC has sufficient funds to ensure any additional site characterization will be completed in a timely manner and there will be no delay in utilizing EPA Brownfields Cleanup funds at the site.

#### 1.f. Resources Needed for Site Remediation (5 points)

FBIC expects the FY26 Brownfields Cleanup Grant funds requested in this application to cover the full amount of the planned remediation. It is possible the removal of asbestos-containing materials such as drywall or flooring may reveal additional mold. If that occurs, FBIC will use Indian Community Development Block Grant (ICDBG) construction funds to remediate the mold. FBIC has not applied for an ICDBG for the Former Commodities Building yet, as we must show we have cleanup funds available for asbestos to complete the project. Our tribes have been very successful in receiving ICDBG funds for projects similar to the Former Commodities Building project.

#### 1.g. Resources Needed for Site Reuse (5 points)

FBIC's Planning Department commissioned a cost/benefit analysis from Jakola Engineering and Architecture in 2024. The report estimated renovation of the Former Commodities Building will cost approximately \$4.2 million. Approximately \$800,000 will go toward restructuring the currently flat roof to a pitched roofing system to allow for snow and rain runoff. The Planning Department plans to apply for a variety of economic development grant funds to complete the building renovation, including U.S. Housing and Urban Development (HUD) ICDBG funds, U.S. Department of Agriculture Community Facilities funds, and Montana Department of Commerce CDBG funds. Several grant opportunities are available for the construction of the business incubation center,

including the Bureau of Indian Affairs Indian Business Incubators Program and the Native American Business Development Institute grants. FBIC plans to apply for these funds in the next application cycle in Spring 2026.

#### 1.h. Use of Existing Infrastructure (5 points)

Redevelopment of the Former Commodities Building presents an opportunity to utilize the existing building, infrastructure, and city services, and avoid the cost of new construction. The existing building is connected to city water and sewer and is serviced by a local electrical company. No additional infrastructure would be needed for site redevelopment.

### **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (35 points)**

#### 2.a. The Community's Need for Funding (5 points)

FBIC is heavily reliant on financial assistance through state and federal programs, such as Brownfields, due to our small population size and low median household income rate. The Fort Belknap Reservation has a total population of 3,382 residents<sup>3</sup>, and our target area for this project, Fort Belknap Agency, has a population of only 1,567 residents<sup>4</sup>. While the U.S. Census Bureau does not have income data specifically for Fort Belknap Agency itself, its data shows median household income for the Reservation is \$50,833, which is 32.5% lower than the median household income for the rest of Montana (\$75,340) and 37.7% lower than the national median household income (\$81,604). Additionally, census data shows only 43% of Fort Belknap Agency's population is of working age (19-64), and the town has an employment rate of only 28.6% (compared to average state and national employment rates of ~61%). The combination of the town's small population partnered with low median household incomes and low employment rates has resulted in nearly 36% of Fort Belknap Agency residents living in poverty, which is significantly higher than the Montana state average of 10.2% and national average of 12.1%. Furthermore, due to the unique relationship Reservation residents have with the United States government and its treaty obligations, FBIC does not tax its members. Ultimately, FBIC's small pool of discretionary funding must be allocated to critical infrastructure and health/safety needs, leaving no funding available for environmental cleanup and subsequent redevelopment projects for the numerous Brownfield sites in our community.

#### 2.b. Health or Welfare Sensitive Populations (5 points)

Prioritization of environmental cleanup and redevelopment projects in Fort Belknap Agency will benefit those most vulnerable in our community, including our Indigenous and adolescent populations. American Indians account for 96% of our target area's population and nearly 40% of all residents are youth under the age of 18. Socioeconomic data from the U.S. Census Bureau suggests significant welfare concerns for these sensitive groups. For example, 26% of Indigenous residents in our target area manage a disability, compared to only 14-16% of both their Indigenous and white counterparts throughout all of Montana. In 2024, the National Council of Urban Indian Health estimated the life expectancy for American Indians was only 65.2 years compared to 76.4 years for the non-Hispanic white population<sup>5</sup>. Children in the target area face even higher health and welfare threats considering 40% of adolescent residents in the target area live in poverty (compared to the state average of 11%).

The cleanup and subsequent redevelopment of the Commodities Building will help combat health and welfare issues plaguing our most sensitive populations such as chronic disability, premature death, and poverty by creating a variety of local economic opportunities for residents. The incubator and business suite spaces will encourage

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<sup>3</sup> [https://data.census.gov/profile/Fort\\_Belknap\\_Reservation\\_and\\_Off-Reservation\\_Trust\\_Land,\\_MT?g=2500000US1150](https://data.census.gov/profile/Fort_Belknap_Reservation_and_Off-Reservation_Trust_Land,_MT?g=2500000US1150)

<sup>4</sup> [https://data.census.gov/profile/Fort\\_Belknap\\_Agency\\_CDP,\\_Montana?g=160XX00US3027850](https://data.census.gov/profile/Fort_Belknap_Agency_CDP,_Montana?g=160XX00US3027850)

<sup>5</sup> [https://ncuih.org/2024/06/07/life-expectancy-rates-for-american-indian-and-alaska-native-people-dropped-dramatically-during-the-covid-19-pandemic/#:~:text=Currently%2C%20the%20life%20expectancy%20for,same%20year%20\(76.4%20years\)](https://ncuih.org/2024/06/07/life-expectancy-rates-for-american-indian-and-alaska-native-people-dropped-dramatically-during-the-covid-19-pandemic/#:~:text=Currently%2C%20the%20life%20expectancy%20for,same%20year%20(76.4%20years))

local entrepreneurship among residents in the target area, and additional jobs will be created through the restaurant and credit agency expansions. Vocational rehabilitation services would also be offered at the Commodities Building, helping lower the rate of unemployment due to disability in our community. The spaces and services that the Commodities Building will offer would bolster the local economy, lower unemployment and poverty rates, and help mentor our adolescent population. Addressing these challenges in our target area will offer residents the financial resources to focus on including chronic health issues and overall wellbeing.

#### 2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 points)

According to the Montana Department of Health and Human Services (DPHHS), cancer rates among American Indian populations are 35% higher than among white populations in Montana. This Montana American Indian-White Incidence Rate Ratio (IRR) is significantly higher for certain types of cancers such as liver (284%), stomach (207%), kidney (166%), and lung (110%)<sup>6</sup>. Considering 96% of our target area's population is American Indian, our community is disproportionately impacted by cancer rates than the rest of the state. DPHHS also reported that lung cancer was significantly more prevalent within the Fort Belknap Reservation than would be expected among white communities in the same region<sup>7</sup>. Furthermore, according to the 2024 Montana Asthma Burden Report, the region encompassing the Fort Belknap Reservation suffers from the state's highest asthma rates, with prevalence among both youth and adult American Indian populations exceeding that of their white counterparts. The primary contaminant of concern at the Commodities Building is asbestos in building materials. Asbestos is a potent carcinogen associated with increased lung cancer incidence. Its presence is especially hazardous to populations with existing respiratory disparities, including those suffering from asthma or other immunocompromising conditions. Completing environmental cleanup activities through this grant will reduce our community's risk of exposure to toxic and hazardous materials and help combat the already greater-than-normal rates of cancer and asthma impacting our residents.

#### 2.d. Economically Impoverished/Disproportionately Impacted Populations (5 points)

Gold mining activities from the mid-to-late 1900s in the adjacent Zortman-Landusky area contaminated Reservation water resources with heavy metals, cyanide, and acid mine drainage. After two decades of remediation efforts, the Montana DEQ determined impacted waterways would need treatment indefinitely. Prior to the mining, FBIC residents relied on these water resources that have now been deemed unsafe for consumption or use. Legacy impacts on our water resources have put additional financial strain on the tribes and local households, who must transport drinking water to the Reservation and also face additional health risks linked to consumption of contaminated water. The result is an added cost of living in the target area, and a reason many enrolled tribal members move to other communities off the Reservation.

Redevelopment of the Commodities Building will help retain residents in the target area and on the Reservation by creating local jobs, business opportunities, and more disposable income. The business incubator will support 10 entrepreneurs at a time, which could equate to 50+ new jobs, the Credit Agency will offer more financial education, lending, and business counseling to help residents budget for expenses related to the cost of transporting water, and the Smokehouse Grille expansion will create 7 new jobs. Together, these investments in the livelihood of our people will increase economic independence on the Reservation, increase household income, and bolster the local economy by keeping jobs, services, and spending within the Agency and Reservation.

### **b. Community Engagement (15 points)**

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<sup>6</sup> Montana DPHHS. 2018-2022 Cancer in Montana: Featuring Physical Inactivity-Associated Cancers in Montana. July, 2025.

<sup>7</sup> Montana DPHHS, Montana Chronic Disease Prevention & Health Promotion Bureau. Cancer on the Fort Belknap Reservation. Updated October 2024.

**2.e. Project Involvement (5 points) and 2.f. Project Roles (5 points)**

FBIC strives to collaborate with local partners and community leaders throughout every aspect of community development projects. Specific project partners, their roles, and how they will support this cleanup project through FBIC’s Brownfield Program are outlined in the table below:

| <b>Project Partners</b>    |   |   |
|----------------------------|---|---|
| <b>Partner</b>             | <b>Point of Contact</b>   | <b>Specific Role in Project</b>   |
| Tribal Planning Department | Delina Cuts The Rope, Planning Director<br>406.353.8435<br>delina.cutstherope@ftbelknap.org     | Secure funding for site redevelopment; Advocate for community needs; Incorporate Brownfields discussions into public meetings hosted by the Planning Department |
| Fort Belknap Credit Agency | Clarissa Bell, Director<br>406-353-8432<br>Clarissa.bell@ftbelknap.org                          | Input on expansion needs, office spaces, training facilities, technology, and public areas  |
| Smokehouse Grill           | Crystal Moore, Owner<br>406-353-4822  | Input on expansion needs, specifications for new coolers and freezer, abatement considerations to limit disruption to restaurant staff                          |
| Vocational Rehab           | Jim Fox, Director<br>406.353.8359<br>jfox@ftbelknap.org   | Input on expansion needs, office spaces, training facilities, technology, and public areas  |
| Tribal Council/Admin       | Ina Nez Perce, CAO<br>406.353.8450<br>inperce@ftbelknap.org                                     | Input and final approval on property use, funding applications, and overarching economic development strategies   |
| Aaniiih Nakoda College     | Joseph Lee Blackcrow, Extension Program Director<br>406.353.3911<br>Jlblackcrow24@ancollege.edu | Input on partnership and needs for joint training facilities, workforce development, and creating a workforce-to-entrepreneur pipeline                          |

**2.g. Incorporating Community Input (5 points)**

Since the inception of our Brownfields Program in 2001, FBIC has prioritized community involvement and stakeholder engagement to guide and inform redevelopment projects. For this cleanup project, we plan to incorporate community input by hosting a public meeting prior to abatement and holding regular stakeholder sessions with tribal leaders, key tribal department managers, and other pertinent community members and organizations. Project updates will be shared regularly on our website and social media pages, and our Environmental Protection Department’s quarterly newsletter will include regular progress updates. Following project completion, we will create a fact sheet describing the cleanup project and highlighting its key components to share with the community. The public meeting will be held in a centrally located, ADA-accessible facility in Fort Belknap Agency to best encourage attendance and accommodate any mobility limitations. Sight and hearing concerns will also be accommodated, as needed, through large print publications and sign language interpretations, and materials will be translated into the native White Clay language upon request. The meeting will offer flexible attendance formats including in-person and online options, encouraging higher attendance. Notes will be taken at all meetings, and community comments, questions, and responses will be recorded in meeting minutes. All comments received during the meeting or subsequent 30-day public comment period will be carefully reviewed and considered, and the FBIC Environmental Protection Department will provide written responses to each comment or question.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS (55 points)**

**3.a. Proposed Cleanup Plan (10 points)**

If Brownfields Cleanup Grant funds are awarded, FBIC will remediate all asbestos and universal waste throughout the Former Commodities Building. If identified, lead-based paint will be encapsulated with a lead-encapsulating

primer. Over 35,000 square feet of asbestos-containing materials (ACM) will be abated, including floor tile and mastic; wall surfacing and joint compound; and ceiling surfacing throughout the building. Universal waste will be removed, which includes 100 PCB-containing light fixtures, 92 PCB-containing light ballasts, 332 mercury-containing light tubes, and 4 mercury-containing thermostats. ACM and universal waste will be hauled to the Havre-Hill County Class II Landfill approximately 45 miles away for disposal. Mold present on ACM will be removed as part of the ACM abatement. Mold present on other non-ACM materials will be removed separately using non-EPA Brownfields funding. FBIC's Environmental Protection Department (EPD) will work closely with the Planning Department to ensure construction crews will be ready to replace building materials as quickly as possible to minimize any disruptions to the Credit Agency and Smokehouse Grille's business operations.

### **3.b. Description of Tasks/Activities and Outputs (25 points)**

#### **3b. Project Implementation, 3c. Project Schedule, 3d. Task/Activity Lead, 3.e. Outputs (10 points)**

1. *Cooperative Agreement Oversight* – We will procure a Qualified Environmental Professional (QEP) within two months of award. Our Environmental Department will update the tribal council members on progress quarterly; coordinate with EPA; update the ACRES database and submit quarterly reports; facilitate site access; attend the national Brownfields conference and the Tribal Lands and Environment Forum (TLEF); and perform general grant management. *Anticipated Schedule:* October 2026 – September 2030. *Task Lead:* Grantee. *Outputs:* 1 QEP hired; 16 quarterly tribal council updates; 16 EPA quarterly reports; 16 ACRES updates; 2 National Conferences and 2 TLEF Conferences.

2. *Community Outreach* - FBIC and the QEP will develop a Community Relations Plan (CRP); prepare 2 fact sheets (one prior to cleanup and one after); hold 2 public meetings (one prior to cleanup and one after); engage local newspaper and radio stations; maintain project information on our website (ftbelknap.org); and post updates on the project on our Facebook page. *Anticipated Schedule:* October 2026 – September 2030. *Task Lead:* Grantee. *Outputs:* 2 fact sheets; 2 public meetings; 8 Facebook updates.

3. *Site Redevelopment Planning* - Prepare conceptual site reuse plans, including a Preliminary Architectural Report and Structural Analysis; Develop 3-D models that display the conceptual site reuse design; Create 2 site renderings showing the site redevelopment. *Anticipated Schedule:* January 2027 – September 2027. *Task Lead:* QEP (due to experience/expertise). *Outputs:* 1 Conceptual Site Reuse Plan; 1 Preliminary Architectural Report; 1 Structural Analysis; 1 3-D model of site reuse design; 2 site renderings.

4. *Cleanup Planning and Oversight* - Before initiating any work, the QEP will draft a Programmatic Quality Assurance Project Plan (PQAPP). The QEP will also finalize the draft ABCA; write a Sampling and Analysis Plan (SAP) for post-cleanup clearance; create bid specifications; and organize a bid walk. The QEP will conduct clearance sampling to ensure no asbestos remains in the air or on building surfaces. The QEP will prepare a Cleanup Completion Reports documenting all cleanup and disposal activities completed by the abatement contractor. *Anticipated Schedule:* January 2027 – September 2030. *Task Lead:* QEP (due to experience/expertise). *Outputs:* 1 QAPP; 1 final ABCA; 1 Clearance SAP; 1 bid specification; 1 Cleanup Completion Report.

5. *Cleanup* - Supervised by the QEP and FBIC EDP, a licensed asbestos abatement contractor will remove ACM and universal waste and encapsulate LBP. *Anticipated Schedule:* April 2028 – June 2028. *Task Lead:* Abatement contractors with Grantee and QEP supervision (due to expertise). *Outputs:* 17 ACMs abated; 100 PCB-containing light fixtures removed; 92 PCB-containing light ballasts removed; 332 mercury-containing light tubes removed; and 4 mercury thermostats removed.

**3.f. Cost Estimates (15 points)**

The following table presents the project budget. As shown on the table, 94% of the funds requested would go toward redevelopment planning, cleanup planning and oversight, and cleanup.

| PROJECT BUDGET      |                                 |                    |                              |                        |                |                |
|---------------------|---------------------------------|--------------------|------------------------------|------------------------|----------------|----------------|
| Budget Categories   | Project Tasks (\$)              |                    |                              |                        |                |                |
|                     | Cooperative Agreement Oversight | Community Outreach | Cleanup Planning & Oversight | Redevelopment Planning | Cleanup        | Total          |
| Personnel           | 24,320                          | 8,600              | 26,880                       | -                      | -              | 59,800         |
| Fringe Benefits     | 7,296                           | 2,580              | 8,064                        | -                      | -              | 17,940         |
| Travel              | 20,600                          |                    | -                            | -                      | -              | 20,600         |
| Supplies            | 1,000                           | 1,000              | -                            | -                      | -              | 2,000          |
| Contractual         | -                               | 5,000              | 95,000                       | 125,000                | -              | 225,000        |
| Construction        | -                               | -                  |                              | -                      | 544,660        | 544,660        |
| Total Direct Costs  | 53,216                          | 17,180             | 129,944                      | 125,000                | 544,660        | 870,000        |
| Indirect Costs      | -                               | -                  | -                            |                        | -              | -              |
| <b>Total Budget</b> | <b>53,216</b>                   | <b>17,180</b>      | <b>129,944</b>               | <b>125,000</b>         | <b>544,660</b> | <b>870,000</b> |

*Cooperative Agreement Oversight* – Personnel Costs: \$40/hour for 6 hours per month for 48 months = \$11,520 plus 40 hours per employee per conference for 2 employees to attend four conferences (2 National Conferences and 2 TLEF conferences) = \$12,800. Fringe Benefits: 30% of Personnel Costs = \$15,360. Travel: \$700 per airline ticket (roundtrip), \$300 per hotel night, \$75 federal per diem rate for out-of-state conferences for 4 conferences for 2 employees to attend assuming each conference is 5 days (including travel) = \$20,600. Supplies: Printing costs for recycled paper and printer ink to print hard copies of reports and planning documents = \$1,000.

*Community Outreach* – Personnel Costs: \$40/hour for 215 hours (roughly 4.5 hours per month) to provide monthly updates and communications to the Tribal Planning Department, Tribal Natural Resources Department, and Tribal Council and to conduct one-on-one stakeholder meetings as well as public meetings. Fringe: 30% of Personnel Costs = \$2,580. Supplies: Printing costs for recycled paper and printer ink to print hard copies of reports and planning documents for public engagement = \$1,000. Contractual: Project Work Plan 10 hours at \$100/hour = \$1,000; Community Outreach Plan 5 hours at \$100/hour = \$500; 2 Public Meetings (includes travel time and prep) 20 hours at \$100/hour = \$2,000; 2 Fact Sheets at 7.5 hours at \$100/hour = \$1,500 = \$5,000.

*Cleanup Planning & Oversight* – Personnel Costs: \$40/hour for 14 hours per month to review reports and provide QEP and contractor oversight = \$26,880. Fringe Benefits: 30% of Personnel Costs = \$8,064. Contractual: QAPP Update 20 hours at \$100/hour = \$2,000; ABCA 30 hours at \$100/hour; THPO Compliance 10 hours at \$100/hour = \$1,000; Cleanup Remediation Verification Plan and Site-Specific Clearance SAP 60 hours at \$100/hour = \$6,000. Bid Specifications 80 hours at \$100/hour = \$8,000; Bid Letting 40 hours at \$100/hour = \$4,000; Federal Cost Cutting Requirements 10 hours at \$100/hour = \$1,000. Abatement Oversight and Clearances = \$40,000 (Includes travel, per diem, lodging, microscope, laboratory fees, and labor for 8 clearances plus final visual clearance). Cleanup Reporting 40 hours at \$100/hour = \$4,000. Project Management 200 hours at \$130/hour = \$26,000. Total Contractual Cost: \$95,000.

*Redevelopment Planning* – Contractual: (Costs are based on other bids obtained for similar services on other projects) Structural, Mechanical, Electrical, and Architectural Report \$65,000; Feasibility Study \$40,000; Site Renderings and 3-D Modeling \$20,000. Total \$125,000.

*Cleanup* - Construction: (Costs are based on other bids obtained and unit costs on our recent Lodge Pole School Abatement Project) Site Mobilization, Preparation and Permitting \$65,000; Food Distribution Program Building Abatement \$151,000; Credit Agency and Social Services Abatement \$155,000; Smokehouse Grill Abatement \$5,000; Lead Based Paint Encapsulation \$40,000; Universal Waste Disposal \$14,000; TERO Fees \$19,660; Solid Waste Fee \$5,000; 20% Contingency \$90,000. Total \$544,660.

### **3.g. Plan to Measure and Evaluate Environmental Progress and Results (5 points)**

Each quarter, completed project deliverables and outputs will be compared to our quarterly schedule for the grant and be reported in ACRES. If any obstacles arise in completing a deliverable, we will discuss the situation with our EPA project officer and develop a plan to achieve the output in our workplan. Outcomes will be tracked and measured by quarterly meetings with the FBIC Planning Department, during the project and after the grant has been closed out. Because FBIC owns the property and will be involved in the redevelopment implementation, the EPD will easily be able to get updated quarterly information and facts regarding outcomes for the project such as jobs created, number of businesses incubated, number of disabled workers counseled, number of entrepreneurs counseled, small business lending, and financial training courses offered.

## **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (30 points)**

### **4.a. Organizational Structure (5 points) and 4.b. Description of Key Staff (5 points)**

To ensure all grant requirements, objectives, and deadlines are met within the four-year performance period, FBIC will rely on the expertise of Ms. Ina Nez Perce, the EPD Manager. Ms. Nez Perce has led the department since 1992, offering nearly 34 years of experience in program administration, community outreach and engagement, and fund management. She has successfully managed numerous EPA grants from programs including Performance Partnership, Climate Change, Brownfields, and Brownfields Tribal Response. Ms. Nez Perce will direct and assist EPD staff in all aspects of the project including public involvement, contracting and procurement, cleanup planning, fieldwork, and grant administration tasks.

Mr. Adrian Kulbeck, Brownfields Coordinator, will be responsible for the day-to-day operations of the Brownfields Program. Mr. Kulbeck has held this position for the past 2 years and excels at engaging with landowners and project partners, hosting community outreach events, coordinating various grant tasks, and completing grant reporting requirements. He will review all technical grant documents and reports, oversee and manage the selected QEP and abatement contractor(s), and ensure all on-site activities comply with approved cleanup plans. Mr. Kulbeck will provide critical program oversight to ensure grant requirements and project timelines are met throughout the grant performance period.

Mr. Kermit "Dale" Snow, Jr., Environmental Compliance Officer for FBIC's Brownfields Program, will ensure all grant activities comply with both tribal and federal regulations. Mr. Snow has worked for the EPD in various positions since 2001 and is an expert in program administration and contractor management. He will assist with community outreach, contractor oversight, maintaining the site inventory list, serving as a liaison with other tribal departments, and researching site background and information.

Robert Bearcub, Chief Finance Officer for FBIC, will serve as the budget manager for the cleanup grant. Mr. Bearcub is responsible for daily accounting functions and preparation of financial reports consistent with generally accepted accounting principles for all FBIC operations. As recipients of multiple federal grants and state funds, including previously awarded Brownfields grants and Brownfields Tribal Response Program funds, FBIC has implemented internal controls consistent with federal guidance to ensure grant funds are properly managed and recorded. Mr. Bearcub will ensure timely draws of grant funds from ASAP, maintain accurate financial records, and ensure all required financial reporting of grant expenses is completed in a timely manner.

4.c. Acquiring Additional Resources (5 points)

FBIC is committed to promoting strong labor practices, supporting local and disadvantaged businesses, and investing in our local economy. These principles will be maintained throughout all proposed project activities including, but not limited to, procurement of a QEP for environmental oversight and bid solicitation for an abatement contractor for site-specific cleanup activities, to ensure an equitable selection process for project partners. Ms. Nez Perce and Mr. Kulbeck will help prepare and distribute a Request for Proposal, and a non-bias selection committee will review and score submitted proposals prior to selecting a contractor. Using this process, FBIC will be able to obtain the expertise needed to successfully complete all project requirements in a fair and objective manner.

4.d. Currently Has or Previously Received an EPA Brownfields Grant (15 points)

*(1) Accomplishments (5 points)* – Over the past 25 years, FBIC has administered a successful Brownfields Program, managing over \$5.95 million in cleanup, assessment, and 128(a) grant funds. Our three most recent grant awards include an FY21 128(a) grant for \$716,628, an FY22 Cleanup Grant for \$500,000, and an FY23 128(a) grant for \$1.55 million. Our FY21 128(a) grant produced the following outputs: 1 Project Design Plan, 1 Community Outreach Plan, 2 Fact Sheets, 2 Public Meetings, 1 ABCA, 1 Clearance SAP, 1 Cleanup Report, abatement of 30 homes on our local runway (airstrip) and 315 tons of regulated asbestos removed. Our FY22 Cleanup Grant will be closed out by June 2026, and we have already produced the following outputs through this grant: 1 Project Design Plan, 1 Community Outreach Plan, 2 Public Meetings, 1 QAPP, 4 ABCAs, 4 Clearance SAPs, 2 Bid Specification Documents, 3 redevelopment community charettes, 1 site redevelopment plan, 2 site renderings, abatement of one former school building, and abatement of a former water treatment plant. Our FY23 128(a) grant is still in progress, and we have already produced the following outputs through this grant: 2 Project Design Plans, 2 Community Outreach Plans, 3 Fact Sheets, 3 Public Meetings, 1 Updated QAPP, 2 ABCAs, 1 Phase II ESA SAP, 1 Phase II Building Materials Investigation, 2 Clearance SAPs, 5 burned home sites abated removed, 4 homes abated, and 2 Cleanup Reports. Current outcomes from these three most recent grants include: a cleared airstrip where emergency flights and air ambulances can land, 5 homesites ready for new construction, 4 renovated homes for tribal families, a former school building ready to be renovated as a youth and cultural center, and a building to accommodate tribal Disaster and Emergency Service needs.

*(2) Compliance with Grant Requirements (10 points)* – FBIC has a proven history of completing and exceeding requirements and goals in our Cooperative Agreements and is in good standing with EPA Region 8. Our Brownfields Program has complied with all reporting requirements including the filing of technical reports, quarterly reports, annual financial status and DBE forms, and Program Activity Level forms. All funds have been expended appropriately to achieve the expected grant outputs and outcomes. All site-specific information for assessment and cleanup projects is recorded in ACRES and is continuously updated, as needed, as redevelopment continues. Our FY21 IJA 128(a) (10/1/21 -9/30/27) grant remains open and funds are fully allocated to the cleanup of the Old Agency Dump and Sacred Heart Church, which will be completed in Spring 2026. Our FY22 Cleanup Grant (10/1/22 – 9/30/26) was extended by one year because we chose to work with the EPA Land Revitalization Technical Assistance (LRTA) Program to complete community meetings and charettes as well as a redevelopment plan and site renderings for the Lodge Pole School. The LRTA process took a year to complete, which delayed cleanup of the former school. This grant currently has \$48,011 remaining and will be closed out with no additional funds remaining. Our FY23 128(a) funds (10/1/22 – 9/30/27) currently have \$1.2 million remaining and are on track to be expended by the grant closeout date. FBIC has allocated these funds to include the assessment, cleanup and redevelopment planning, and cleanup of the John Capture Center in Hays, MT; cleanup of burned homes; and assessment and cleanup of foster care homes on the Fort Belknap Reservation.

**Attachment A**  
Threshold Criteria Response

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

### **1. Applicant Eligibility**

- a. Fort Belknap Indian Community is composed of two federally recognized Native American tribes, the Aaniiih (Gros Ventre) and the Nakoda (Assiniboine) and is eligible for funding.
- b. The Fort Belknap Indian Community is exempt from federal and state taxation as federally recognized tribes and sovereign governmental entities. The tribes are not classified as 501(c) (4) organizations and do not lobby the federal government.

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

The Commodities Building has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

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

The Fort Belknap Indian Community does not have an open EPA Brownfields Multipurpose Grant.

### **4. Site Ownership**

The Fort Belknap Indian Community is the current owner of the Commodities Building and will retain ownership of the property throughout the life of the grant. The property is tribal trust land that was given to the tribes when the Fort Belknap Indian Reservation was established in 1888. The tribes have no plans or intentions to sell the property.

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

Fort Belknap Former Commodities Program Building  
2222 Food Farm Avenue  
Fort Belknap Agency, MT 59526

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

- a. **Contamination** - The site is contaminated by hazardous substances, including asbestos and universal waste.
- b. **Past and Current Use** - The 13,900 square foot building was originally built in 1978 as a shopping center. The building is partitioned into three main areas. Past uses include the United States Department of Agriculture (USDA) tribal Food Distribution Program and Commodity Supplemental Food Program distribution center, tribal credit offices, social services, restaurant, and coffee shop. Currently, two out of the three sections of the building are vacant and unusable due to the deterioration of the building and need for asbestos abatement. The third section of

the building currently operates the Smokehouse Grille restaurant, but the tribes are considering closing the restaurant due to adverse building conditions.

- c. **Environmental Concerns** – A Phase II Environmental Site Assessment (ESA) completed in 2023 confirmed 17 asbestos containing materials located throughout the building. Many of the materials are regulated asbestos. Numerous universal wastes were also documented throughout the building, including mercury-containing light tubes and thermostats and PCB-containing light ballasts and light fixtures.
- d. **Nature and Extent of Contamination** – The Commodities Building was constructed in 1978 at a time when asbestos-containing building materials and mercury-containing fixtures were commonplace in construction. The tribes have maintained the roof, doors, and windows to prevent any release of asbestos to the environment. All asbestos and universal wastes are confined to the three different sections of the building.

## 7. **Brownfield Site Definition**

The Commodities Building site meets the definition of a brownfield site. The Commodities Building is not:

- a. Listed or proposed for listing on the National Priorities List;
- b. Subject to Unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and,
- c. Subject to the jurisdiction, custody, or control of the US government.

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

A Phase II ESA was completed for the Commodities Building on November 30, 2023. The Phase II evaluated asbestos, mold, and universal wastes.

## 9. **Site Characterization**

The Fort Belknap Indian Community Environmental Authority affirms there is a sufficient level of site characterization from the environmental site assessment performed to date for remediation work to begin at the site.

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

There are no known ongoing or anticipated environmental enforcement or other actions related to the Commodities Building site.

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

EPA deemed the Commodities Building eligible for Brownfields funding on September 22, 2023. The site does not require a property-specific determination.

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

The Commodities Building is contaminated with hazardous substances.

### **a. Property Ownership Eligibility – Hazardous Substance Sites**

#### **i. Exemptions to CERLA Liability**

The Commodities Building is owned by the Fort Belknap Indian Community, which is composed of two federally recognized Native American tribes, the Aaniiih (Gros Ventre) and the Nakoda (Assiniboine). The tribes are exempt from demonstrating they meet the requirements of a CERLA liability defense.

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

### **a. Oversight Structure**

The Fort Belknap Indian Community Environmental Department will oversee cleanup at the Commodities Building site, and the site will be enrolled in Fort Belknap’s Tribal Response Program. Fort Belknap Indian Community’s Environmental Office Director and Brownfields Coordinator will oversee the cleanups of the above site with the assistance of a Qualified Environmental Professional (QEP). We have experience with similar cleanup projects on our Reservation. Fort Belknap Indian Community will consult with EPA to ensure that all cleanup plans are appropriate, and the cleanup activities will be protective of human health and the environment. Fort Belknap Indian Community intends to hire both a QEP to manage and oversee the cleanup, and an abatement contractor to conduct abatement and removal of the hazardous materials.

### **b. Neighboring Properties**

Access to neighboring properties will not create problems for this project because the Commodity Building is located on a larger tract of trust land that is owned by the Fort Belknap Indian Community.

## **14. Community Notification**

### **a. Draft Analysis of Brownfield Cleanup Alternatives**

A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared and presented to the Fort Belknap Agency Community on January 7, 2026. A copy of the draft ABCA is included in this application as **Attachment B**.

### **b. Community Notification Ad**

Fort Belknap Indian Community published a community notification ad on the tribe’s Facebook page on January 2, 2026. There is not a regional or local daily newspaper that serves the reservation, and the tribe’s Facebook page is where local residents receive their news. A copy of the Community Notification Ad is included in this application as **Attachment C**.

### **c. Public Meeting**

A public meeting to discuss the draft grant application and cleanup alternatives for the Commodities Building was held on January 7, 2026 in Fort Belknap Agency. The following are included in **Attachment D**:

- Summary of public comments received;
- FBIC’s response to public comments;
- Meeting notes;
- Meeting sign-in sheet

**d. Submission of Community Notification Documents**

As noted above, the following items are attached to this grant application in **Attachments B, C, and D**:

- Copy of the draft ABCA;
- Dated screenshot of the community notification posted January 2, 2026 to FBIC’s tribal Facebook page
- Summary of public comments received;
- FBIC’s response to public comments;
- Meeting notes;
- Meeting sign-in sheet

**15. Contractors and Named Subrecipients**

Not Applicable - Fort Belknap Indian Community has not identified any contractors or subrecipients to be named in this application. Fort Belknap Indian Community intends to hire a Qualified Environmental Professional (QEP) to manage and oversee the cleanup and an abatement contractor to conduct abatement and removal of the hazardous materials after an EPA cooperative agreement is awarded. Our procurement will be consistent with the competitive procurement provisions of 2 CFR §§200.317 through 200.326.