



**White Mountain Apache
Community Development Corporation**

P.O. Box 550

McNary, Arizona 85930

Phone (928) 369-1753 · Fax (928) 369-2064

R09-26-C-001

1. Applicant Identification

White Mountain Apache Community Development Corporation (CDC)
1114 North Hondah Drive
Pinetop, Arizona 85935

2. Website URL: <http://www.wmat.us/hawleycabins.html>

3. Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$2,801,695

4. Location

- a) Hawley Lake Recreational Area (unincorporated area), b) Navajo County, c) Fort Apache Reservation, Arizona

5. Property Information

Hawley Lake Recreational Area

- Comprising 113 rental cabins within 900-acre target area centered at a latitude of 33°59'14" N and a longitude of 109°44'52" W
- Zip Code – 85935

6. Contacts

a. Project Director

Ruby Altaha, Executive Director
(928) 369-1753
RubyAltaha@wmat.us
1114 North Hondah Drive, Pinetop, Arizona 85935

b. Chief Executive/Highest Ranking Elected Official

Jerold Altaha, Chief of Staff, Executive
Office of the Vice Chairman
(928) 338-2540
jeroldaltaha@wmat.us
PO Box 700, Whiteriver, Arizona 85941

7. Population

15,342 – Fort Apache Reservation, AZ
(US Census: 2019–2023 American Community Survey)



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8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	4
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.	N/A
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.	N/A
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).	1
The proposed site(s) is in a federally designated flood plain.	N/A
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.	N/A

9. Releasing Copies of Applications

Not Applicable.



**White Mountain Apache Tribe
Community Development Corporation**

**FY26 Brownfield Cleanup Grant
Narrative**



White Mountain Apache Community Development Corporation FY2026 US EPA Brownfields Cleanup Grant

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields. a. Overview of Brownfield Challenges and Description of Target Area: The White Mountain Apache Tribe (WMAT), a federally recognized tribal nation, resides on the Fort Apache Indian Reservation, an expansive 1.7-million-acre homeland in east-central Arizona spanning Navajo, Gila, and Apache counties. Established in 1871, today the reservation is home to 15,342 people.¹ The WMAT people have lived in the region for countless generations, maintaining a deep spiritual and cultural connection to the land, water, and wildlife of the White Mountains. Their traditions are rooted in stewardship, resilience, and a profound respect for the natural world. Despite these strengths, the community has faced centuries of hardship, including forced relocation, loss of traditional livelihoods, and ongoing challenges of isolation and underinvestment. These factors have contributed directly to the emergence of **brownfield challenges** across the reservation, with abandoned, deteriorated, or underused properties becoming more common in the absence of sustained investment and economic opportunity. Today, the tribe's commitment to preserving its heritage and providing for future generations is evident in every aspect of community life, yet persistent economic and environmental barriers threaten its well-being and the sustainability of its homeland. The reservation has historically faced persistent **health and welfare challenges**, a reality compounded by current figures reflecting a low median family income at \$44,241 (US \$96,922) and higher-than-average poverty levels at 38% (US 8%).¹

The White Mountain Apache Community Development Corporation (CDC), a 501(c)(3) nonprofit established under tribal law, is dedicated to serving the development needs of the community and will be the grant applicant. The **geographic boundary** for this grant is the Fort Apache Tribal Area, **and the target area** is the **East-Central Hawley Lake Recreation Area (Site 2)**, located in the northeast portion of the reservation. Hawley Lake, a 300-acre alpine lake at 8,200 feet elevation, serves as the centerpiece of a region renowned for its natural beauty, abundant wildlife, and recreational opportunities including fishing, boating, hiking, and mountain biking. The area provides a vital respite for visitors and tribal members alike, and this grant will allow the community the opportunity to revitalize tourism, create jobs, and improve community health.

b. Description of the Proposed Brownfield Site(s): Beginning in 1959, the WMAT granted 25-year ground leases to non-tribal members for cabin lots surrounding Hawley Lake. Leaseholders constructed cabins on these lots, but had no guarantee of lease renewal. The tribe ultimately chose to not extend the leases to preserve tribal cultural identity and address significant financial losses from low lease rates. Leaseholders were given the option to remove their cabins or donate them to the CDC. Over time, many remaining structures have deteriorated significantly due to insufficient funding for maintenance or abatement of asbestos hazards, as well as the natural aging of buildings constructed between 1959 and 1978. Some cabins have become unsafe or have partially collapsed after large trees fell on them, damaging roofs and walls. The unsafe cabins are presumed to contain asbestos-containing materials (ACMs) due to the date of construction. Prior asbestos surveys confirmed the presence of ACMs (defined as containing more than 1% asbestos by weight) in floor tile and mastic, roofing shingles and felt, window caulking, and building filler materials. Asbestos is also present in asbestos-cement pipe located throughout the area. The CDC previously received **FY2022 Brownfields Cleanup funding** to remediate 38 cabins in Site 1 of the Hawley Lake Recreation Area. Efficient project management enabled the abatement of an additional 23 cabins, for a total of 61 remediated cabins. EPA Region 9 has confirmed the CDC's eligibility to request a second Brownfields Cleanup Grant for the next phase of work.

¹ US Census 2019–2023 American Community Survey.



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The Hawley Lake Recreation Area is divided into multiple abatement sites. The current target, **Site 2 Abatement Area**, includes 121 cabins in varying states of disrepair and lots with collapsed or severely damaged structures. Prior assessments also identified 37,190 linear feet of asbestos-cement pipe requiring removal. Cleanup activities for Site 2 will include asbestos abatement in the standing cabins, removal and disposal of eight damaged cabins determined to be structurally unsound and unsafe to enter for assessment or abatement, and removal of asbestos-cement pipe. The Analysis of Brownfields Cleanup Alternatives (ABCA) determined that the full abatement of ACMs in 113 cabins combined with off-site disposal of the eight additional damaged cabins and removal of the asbestos-cement pipe was the most effective and cost-efficient remedial option.

Revitalization of the Target Area. c. Reuse Strategy and Alignment with Revitalization Plans:

The White Mountains, home to the WMAT, are recognized as one of Arizona's most scenic and frequently visited regions, featuring high peaks, lakes, streams, and diverse forests. The tribe's **Economic Development Strategic Plan** prioritizes leveraging these natural resources to **promote tourism and recreation** and specifically identifies **the redevelopment of the Hawley Lake Recreation Area as a key economic stimulus** for the reservation. The reuse strategy for the proposed cleanup site aligns directly with this vision. Rehabilitation and redevelopment of damaged cabins, along with the removal of asbestos-cement water pipes, will eliminate longstanding health and safety hazards and enable future tourism-focused development. The **Hawley Lake Redevelopment Master Plan**, developed through Tribal Planning Committee engagement and stakeholder input, recommends repairing, demolishing, or redeveloping rental cabins as an initial step. Future phases outlined in the plan include construction of a small lodge, additional RV pads, and new rental cabins. If dilapidated properties are removed, the complex could evolve into a premier summer tourism destination. Additionally, maintaining year-round access via Highway 473 would allow Hawley Lake to complement the Sunrise ski area, with proposed amenities such as 20 new cabins and a lodge offering 30 seasonal guest rooms. Public involvement has been integral to shaping this reuse strategy. The tribal council directed the planning committee to solicit community input, ensuring redevelopment reflects tribal priorities for cultural preservation, economic revitalization, and environmental health. **The target area is not located within a federally designated flood plain**, and the proposed reuse strategy appropriately considers site conditions to minimize future environmental risks. With brownfields funding, the CDC will implement remedial actions that advance these goals, positioning Hawley Lake as a safe, attractive destination for tribal members and visitors while supporting long-term economic growth.

d. **Outcomes and Benefits of Reuse Strategy:** The reuse strategy for Hawley Lake will deliver substantial **environmental, economic, and social benefits** for the WMAT and the broader community. Brownfields grant funding will be used to abate ACMs in 121 cabins, which will be gradually brought back into rental service over the next three years. The CDC has developed a ten-year pro forma analysis to estimate the increased rental income generated by redeveloping the cabins after asbestos abatement. This analysis projects that as cabins are restored and returned to service, annual gross rental income will reach \$1.4 million, representing a **\$5.10 return for every \$1 of Brownfields investment** over the ten-year period. These projections do not include additional revenue from recreational licenses, retail, or other enterprises, nor do they account for secondary economic benefits such as **the creation of 20 to 60 new permanent jobs for tribal members**. The project will also contribute to the **long-term revitalization of the Hawley Lake area as an outdoor recreation destination**. Restored cabins will strengthen access to tribal parks, trails, undeveloped natural areas, and recreational amenities that provide cultural, ecological, and



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tourism value. By reinvesting in the lake's rental infrastructure and outdoor assets, the project helps preserve and enhance spaces used for cultural and community purposes.

Cleanup and reuse activities will improve the tribe's **resilience to extreme weather events and natural disasters**. Removing ACMs and stabilizing aging structures will reduce health risks and improve structural integrity, thereby limiting vulnerability to wildfire smoke, high winds, heavy snowfall, and other severe weather conditions common at high elevations. The phased restoration will integrate **renewable energy** solutions, including solar power, alongside enhanced insulation, **energy-efficient** appliances, and additional performance upgrades that lower long-term operating costs and strengthen the tribe's overall energy resilience. The reuse strategy for Hawley Lake will revitalize a key community asset, generate sustained economic growth, expand tribal employment opportunities, enhance recreational and natural areas, and strengthen long-term climate and disaster resilience for the WMAT.

Strategy for Leveraging Resources. e. Resources Needed for Site Characterization: The prior site investigation was sufficient to characterize the extent and degree of the impact of the site. The CDC does not anticipate needing more funding for further site characterization and is ready to proceed to cleanup. If further site characterization is needed, the tribe can use its annual **EPA Brownfields 128(a) Tribal Response and GAP funding** to support additional assessment. The CDC has also discussed potential **State Response Program** funding with the Arizona Department of Environmental Quality and the **EPA Targeted Brownfields Assessment Grant**.

f. Resources Needed for Site Remediation: The CDC is confident that the EPA funding requested in this application is sufficient to complete remediation of the cabins, rubble, and asbestos-cement pipe at Hawley Lake. The funding request is based on actual 2024 contractor bids for abatement of 61 cabins of similar size and ACMs and includes a 5% inflation factor and 10% contingency to address potential cost overruns or unforeseen site conditions. In addition, CDC maintains a capital reserve fund that can be used to cover any minor funding gaps or unexpected expenses during remediation.

g. Resources Needed for Site Reuse: The CDC has developed both reservation-wide and site-specific master plans that reflect community-driven priorities for the long-term reuse of Hawley Lake. To advance these plans, CDC has secured commitments from the tribe, the Environmental Protection Office, and project partners to support reuse activities, including repurposing the existing cabins. Leveraged resources include tribal capital reserves, public grant programs, private financing opportunities, and technical assistance already committed to the project. Together, these resources will support necessary redevelopment actions—such as demolition, rehabilitation, and site improvements—ensuring the cabins can be safely and effectively reused. **Documentation of secured leveraged funding and support is attached.** In addition, the CDC maintains an internal capital reserve fund to assist with reuse activities and address any minor funding gaps.

h. Use of Existing Infrastructure: This grant will support the reuse of existing infrastructure by building on ongoing planning and technical assistance efforts. The CDC secured support from the EPA Land Revitalization Program to evaluate water, wastewater, electrical, and broadband infrastructure needs. In October 2024, the WMAT was awarded \$5,575,000 from the Arizona Water Infrastructure Financing Authority to complete critical repairs and replacements to potable water and wastewater systems that serve the area. The current electrical supply is sufficient for existing demand; however, the CDC is coordinating with the EPA and the Navopache Electric Cooperative to plan for future power needs and pursue relevant funding sources. For broadband service, CDC is assessing feasible options to extend internet access to Hawley Lake, including leveraging funding opportunities through the US Department of Commerce's Broadband for All



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Initiative, with documentation of these efforts included. The CDC also maintains a capital reserve fund to support reuse activities and to address minor infrastructure-related funding gaps.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need. a. The Community's Need for Funding: The WMAT faces significant economic and social challenges that underscore the urgent need for EPA Brownfields Grant funding. With a population of 15,342, the target area is **predominantly Native American (92%).**² Poverty is widespread, affecting 41% of residents, more than three times the national rate (12%), and **47% of all children under 18 live in poverty.**² **The median family income is \$44,241,** less than half the national average (\$96,922), and **the per capita income is \$15,198 (US \$43,289).**² The combination of a small, remote population, economic disparity, and chronic underfunding of federal programs has resulted in a limited tribal budget and an inability to address critical environmental and redevelopment needs. The CDC, whose primary income comes from cabin rentals supplemented by tribal support, has seen its budget decline by 60% over the past three years, severely impairing its ability to maintain properties or undertake necessary abatement. The economic welfare of both the CDC and the tribe has suffered due to lost rental income, the impacts of the COVID-19 pandemic, a 29-year drought, declining precipitation and snowfall, and devastating forest fires. Without EPA Brownfields Cleanup Grant funding, the CDC cannot take the essential first step of abating ACMs in idle cabins, which is critical to the organization's long-term viability and the economic future of the WMAT. This grant will provide the resources needed to address environmental hazards, revitalize the community, and create new opportunities for tribal members.

b. Health or Welfare of Sensitive Populations: American Indian communities, particularly those in rural and remote areas, often experience elevated rates of poverty, unemployment, and limited access to healthcare and education. Within the WMAT, these issues are especially pronounced. **Unemployment stands at 8.5%,** higher than the national average (US 5%), and **42% of residents rely on food assistance programs,** nearly four times the US rate of 11%.² **The low median household income is \$41,737,** and **38% of the of all families lives below the federal poverty level,** compared to 8% nationally.² Among children under 18, the poverty rate is even more alarming at **47%,** nearly triple the national rate of **16%.²** Educational attainment is also a concern: **30% of the population has not completed 12th grade, compared to 6% nationally, meaning the community's non-completion rate is five times the US average.^{3,4}** These low levels of education are closely tied to high unemployment and limited access to stable, well-paying jobs. Without post-secondary credentials or vocational training, many tribal members face systemic barriers to employment, contributing to cycles of poverty and disenfranchisement.

The proposed reuse of the brownfields site will directly mitigate these threats. This redevelopment will create accessible employment opportunities that do not require advanced degrees, enabling individuals with limited formal education the opportunity to gain meaningful work experience. It will also stimulate local economic growth through tourism and hospitality, sectors that can support on-the-job training and career advancement. By fostering job creation and community engagement, EPA Brownfields funding will serve as a catalyst for environmental health improvements and long-term socioeconomic resilience for the WMAT.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: The target area

² US Census 2019–2023 American Community Survey.

³ ADHS; WMAT Primary Care Area, 2020 Statistical Profile.

⁴ www.census.gov/newsroom/press-releases/2025/educational-attainment-data.html.



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ranks in the **89th percentile for drinking water non-compliance** and **77th percentile for lead paint**, indicating elevated environmental health risks.⁵ Health indicators are equally concerning, as **10% of adult residents report asthma** (US 8%),⁶ and **8.5% report cancer, excluding skin cancer** (US 7%),⁷ reinforcing the disproportionate burden of disease.⁸ American Indian populations in Arizona, including those in Apache County, where WMAT is located, experience elevated rates of breast, colorectal, kidney, and liver cancers. Nearly half (49%) of the tribal members surveyed had two or more cardiac risk factors, including obesity, hypertension, and smoking.⁹ Diabetes and chronic liver disease contribute to disproportionately high mortality rates among tribal members with diabetes mortality reaching **47.7 deaths per 100,000** (US 24.1 per 100,000), and chronic liver disease mortality rising to **64.7 deaths per 100,000** (US 13.8 per 100,000).¹⁰ The reservation also has a notably high fertility rate, **165 births per 1,000 females aged 15 to 34** (US **75 births per 1,000**), with **14% of births to teens**, indicating a high concentration of pregnant women and nursing mothers who are especially vulnerable to environmental health risks.¹¹ These conditions are exacerbated by environmental factors, including the presence of brownfields. The cleanup and redevelopment of the priority site will reduce exposure to hazardous substances and support health and wellness initiatives. The reuse strategy, developing new cabins and seasonal lodging, will not only improve environmental conditions but also generate economic opportunities that can enhance access to healthcare, nutrition, and stable housing. These improvements will help address the root causes of health disparities and contribute to long-term community well-being.

d. Economically Impoverished/Disproportionately Impacted Populations: The WMAT faces longstanding economic and environmental challenges that disproportionately impact tribal members, particularly those with limited financial resources or access to services. The Hawley Lake Recreation Area contains widespread ACM contamination from deteriorated cabins and debris, posing ongoing health and safety risks for residents, workers, and visitors. These environmental burdens compound existing socioeconomic hardships and limit opportunities for economic advancement. The proposed cleanup and reuse strategy will directly address these inequities by eliminating hazardous materials, improving environmental quality, and reducing preventable exposure risks. Restoring the cabins will create accessible job opportunities in cleanup, maintenance, tourism, and hospitality, pathways that do not require advanced education and can provide immediate, stable employment for individuals facing systemic barriers to work. Reuse of the lake area will also support the tribe's long-term economic resilience by strengthening tribal enterprises, expanding tourism revenue, and enhancing the ability to invest in community priorities. By reducing environmental hazards, improving access to employment, and supporting sustainable economic growth, this project will help alleviate the disproportionate impacts borne by economically impoverished tribal members. The cleanup and revitalization of Hawley Lake will not only improve health and safety but also contribute to greater equity, long-term stability, and quality of life for the WMAT.

⁵ <https://pedp-ejscreen.azurewebsites.net/>.

⁶ www.cdc.gov/asthma/most_recent_national_asthma_data.htm.

⁷ www.cancer.org/content/dam/cancer-org/research/cancer-facts-and-statistics/annual-cancer-facts-and-figures/2023/2023-cancer-facts-and-figures.pdf.

⁸ <https://ejamapi-84652557241.us-central1.run.app/report?fips=04001970502&buffer=0>.

⁹ *Archives of Internal Medicine*: The Increasing Incidence of Coronary Artery Disease and Cardiovascular Risk Factors Among a Southwest Native American Tribe: The White Mountain Apache Heart Study.

¹⁰ www.azdhs.gov/documents/director/tribal-liaison/2021-american-indian-status-report.pdf

¹¹ pub.azdhs.gov/health-stats/report/hspam/2021/indian2021.pdf



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Community Engagement e. Project Involvement & f. Project Roles: Project partners will have meaningful input and will be involved in decisions on cleanup and reuse of the cleanup site.

Name of Organization	Entity’s Mission	Point of Contact	Specific Involvement or Assistance Provided
Rainbow Treatment Center	Operates “Working to Wellness” addiction treatment program	Vangie Natan, Director vanienatan@wmat.us	Assistance/Decision Making: community outreach to develop and guide cleanup and reuse plan; identify potential workers.
Kingdom Workers	Faith-based nonprofit focused on community service	Sherree Massey smassey@kingdomworkers.com	Assistance/Decision Making: outreach support, program leadership, and resource support.
Local First Arizona	Supports rural and tribal communities with inclusive community and economic development	Kimber Lanning kimber@localfirstaz.com	Assistance/Decision Making: technical assistance for community engagement and involvement.
Tribal Employment Rights Office (TERO)	Assures qualified tribal members are given employment and contracting preference	Gary Hill garyhill@wmat.us	Assistance/Decision Making: identifying workers to be hired for grant-funded work.

g. Incorporating Community Input: The CDC has prioritized meaningful community engagement throughout the planning and development of cleanup and redevelopment options for the Hawley Lake site. Over several years, the CDC has worked closely with tribal members, presenting information before the tribal council, collaborating with other tribal departments, and soliciting resident input through emails, outreach events, and personal communication. On January 7, 2026, the CDC sent an email notification to 599 community members, encouraging feedback on this grant-related cleanup project, application, and draft ABCA. On January 9, 2026, a public notice was issued in the *Fort Apache Scout* and a public meeting was held in person at the CDC office. For those unable to attend in person, virtual participation was available for community education meetings via teleconference and online platforms, ensuring accessibility for all community members.

Progress updates and community meetings will be scheduled at key milestones throughout the grant program, including grant receipt, ABCA availability, abatement initiation and completion, and grant closeout. The CDC will update its existing Community Involvement Plan (CIP) that outlines specific outreach activities, schedules, and responsible staff. The CDC will maintain an administrative record accessible at a convenient location, such as the CDC office and tribal government buildings. The CDC will maintain a record of relevant project documents, public notices, meeting minutes, and responses to public comments. The CDC will respond directly to commenters within two weeks of receiving input, and significant changes to the cleanup plan will be promptly communicated via email, website updates, flyers at prominent locations, and announcements in tribal government buildings. Monthly meetings with project partners will ensure ongoing collaboration and transparency. Communications will be conducted in person, virtually, and in both English and Ndeé (Apache), with interpreters and bilingual staff available to support Apache-speaking residents. The CDC will also utilize social media, the CDC website, and community bulletin boards to keep residents informed and engaged. This comprehensive approach



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ensures that community input is actively solicited, considered, and incorporated into project decisions, and that all residents have meaningful opportunities to participate throughout the life of the project.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: Prior asbestos investigations were conducted on the site, identifying ACMs within the cabins and asbestos-cement pipe. ACMs were assumed in the structurally unsafe cabins since they could not be assessed. The CDC is submitting this application with a proposed cleanup plan to abate ACM within the 113 standing cabins, dispose of eight additional collapsed/damaged cabins as RACM, and approximately 37,190 linear feet of asbestos-cement pipe. Completion of the abatement funded by this Cleanup Grant will result in the removal of all ACMs from the recreational area and enable planned redevelopment. The proposed remedial action has been developed based on previous site assessment and remediation, future redevelopment plans, and stakeholder input. The draft ABCA submitted with this application demonstrates that these actions are an appropriate site remedial solution, and the Tribal Historical Preservation Office has determined that the remedial actions will have no impact on tribal cultural and historical resources. The CDC will update the Preliminary ABCA based on community input and comments, and the seven alternatives in the Preliminary ABCA will be evaluated using criteria of effectiveness, implementation ability, and total costs.

Description of Tasks/Activities and Outputs:

Task 1: Outreach	
b.	<i>Project Implementation: EPA-Funded:</i> Updated CIP, outreach materials, Brownfield (BF) webpage, and social media posts will be developed by the CDC’s BF Project Director with assistance from the environmental contractor (EC). CDC staff will lead the community/educational meetings discussing project plans and updates. Supplies: printing of outreach materials (brochures/handouts) and office supplies to manage the grant.
c.	<i>Anticipated Project Schedule:</i> Updated CIP created in Q1. Community/educational meetings held Q1 in Y1–3 and Q2 in Y4. BF webpage and outreach materials created in Q1 and posted throughout the grant project.
d.	<i>Task/Activity Lead:</i> CDC: Ruby Altaha, CDC Director, BF Project Director
e.	<i>Outputs:</i> Updated CIP, BF webpage, 4 community/educational meetings, brochures/handouts, social media posts, summary of community meetings in EPA-required quarterly reports.
Task 2: Program Management	
b.	<i>Project Implementation: Non-EPA-Funded:</i> The CDC will procure an EC to assist with the BF Grant project. <i>EPA-Funded:</i> The CDC’s BF Finance Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement work plan, schedule, and terms and conditions. The EC will assist in completing ACRES database reporting, yearly financial reporting, quarterly reporting, and additional programmatic support for the four-year term of the grant. The travel budget allows for two staff to attend three BF training conferences/workshops.
c.	<i>Anticipated Project Schedule:</i> Procure EC in Q1. ACRES & quarterly reporting begins in Q1 and continues throughout the grant. Annual reporting and forms created in Q5, Q9, Q13, and final closeout.
d.	<i>Task/Activity Lead:</i> CDC: Gary Gregg, CDC Accounting Technician, BF Finance Manager
e.	<i>Outputs:</i> ACRES database reporting, 4 annual financial reports, 16 quarterly reports, and programmatic support for the four-year grant period. Final grant closeout report. Two staff to attend three conferences.



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Task 3: Cleanup Planning	
b.	<i>Project Implementation: EPA-Funded:</i> The EC will finalize the draft Analysis for Brownfield Cleanup Alternatives (ABCA) and/or Cleanup Plans, which include evaluating cleanup alternatives, calculating cleanup costs, and determining site-appropriate remediation and/or reuse planning to reduce health/environmental risks. The EC will prepare the Site-Specific Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP), prepare bid specifications for the various cleanup activities for remediation contractors to bid upon, and host a vision session with the community for site redevelopment.
c.	<i>Anticipated Project Schedule:</i> Initiated on award and funding of the grant 10/2026; QAPP/HASP, bid specifications preparation 12/2026; QAPP/HASP and cleanup plans approval 2/2027; vision session conducted within 120 days of grant award.
d.	<i>Task/Activity Lead:</i> The EC will implement the technical aspects of the project with oversight from the CDC: William Watt, Maintenance Supervisor, BF Project Manager.
e.	<i>Outputs:</i> 1 ABCA, 1 Bid Specifications, 1 QAPP/HASP, 1 Vision Session
Task 4: Cleanup & Oversight	
b.	<i>Project Implementation: EPA-Funded:</i> The CDC will work with the EC as they manage the site cleanup activities, perform confirmation sampling, contractor oversight, cleanup reporting, and final remedial action report. The CDC and EC will work with a remediation contractor as they perform site-cleanup activities, including contractor mobilization/demobilization and cleanup implementation.
c.	<i>Anticipated Project Schedule:</i> Oversight will follow cleanup schedule. Final remedial action report December 2027. Cleanup implementation May 2027–September 2027.
d.	<i>Task/Activity Lead:</i> The EC will conduct cleanup oversight of the project. The remediation contractor will implement cleanup activities with oversight from EC and CDC: Ruby Altaha, CDC Director, BF Project Director.
e.	<i>Outputs:</i> 1 final remedial action report, 1 site ready for reuse, 1 job for oversight, and 2 jobs for cleanup activities

f. Cost Estimates: Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks*. The budget for this project includes travel, conference registration (other), supplies, construction and contractual costs only. No administrative costs are included in the budget.

Personnel pay rates average \$41 per hour including fringe.

Task 1 Outreach: Personnel (\$41/hr): Update CIP \$492 (12 hrs); BF webpage, outreach brochure/handouts, social media posts \$820 (20 hrs); 4 community/educational meetings \$3,280 (20 hrs per meeting to include preparation and execution; \$820 each meeting). **Contractual:** Update CIP \$2,400 (12 hrs × \$200); BF webpage, outreach brochure/handouts, social media posts \$3,000 (15 hrs × \$200); 4 community/educational meetings \$8,000 (\$2,000 per mtg.; 10 hours per meeting to include preparation and execution × \$200/hr). **Supplies:** \$2,000 (\$500 [500 printouts at \$1 each]; \$1,200 [12 display board printouts at \$100 each]; pens, markers, paper \$300).

Task 2 Program Management: Personnel (\$41/hr): ACRES database reporting, yearly financial reporting, quarterly reporting, final grant closeout report \$8,200 (200 hrs). **Contractual:** ACRES database reporting, yearly financial reporting, quarterly reporting, final grant closeout report \$25,000 (125 hrs × \$200). **Travel:** 2 staff to attend 3 conferences for a total of \$10,800 (flights at \$500, 3 nights in hotel at \$300/night, incidentals and per diem at \$100 per day × 4 days × 2 staff × 3 events). **Other:** \$1,800 conference registration (\$300 per event per person).



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Task 3 Cleanup Planning: Personnel (\$41/hr): vision session \$410 (10 hrs); 3 report reviews \$246 (2 hrs/report; 3 reports). Contractual: Finalize draft ABCA \$5,000 (25 hrs × \$200); prepare bid specifications \$4,000 (20 hrs × \$200); prepare site-specific QAPP/HASP \$7,400 (37 hrs × \$200); 1 vision session \$3,000 (15 hrs × \$200).

Task 4 Cleanup & Oversight: Personnel (\$41/hr): Contractor procurement and oversight during the 139 days of cleanup activities \$30,135 (735 hrs). Contractual: Abatement oversight: \$326,372 (139 days × \$2,348/day); Bid walk and assisting grantee with abatement contractor procurement \$6,000 (30 hrs × \$200); Analytical air samples \$13,200 (\$12/sample × 1,100 samples); Closeout report \$12,000 (60 hrs × \$200). Construction: Cabin abatement \$1,074,200 (131 days × \$8,200/day); Collapsed/damaged cabin removal and disposal \$287,000 (8 cabins × \$35,875/cabin); Cement pipe abatement \$966,940 (37,190 linear feet × \$26/linear foot).

Category	Tasks				Totals
	<i>Outreach</i>	<i>Program Management</i>	<i>Cleanup Planning</i>	<i>Cleanup & Oversight</i>	
Personnel	\$4,592	\$8,200	\$656	\$30,135	\$43,583
Travel		\$10,800			\$10,800
Other		\$1,800			\$1,800
Supplies	\$2,000				\$2,000
Contractual	\$13,400	\$25,000	\$19,400	\$357,572	\$415,372
Construction				\$2,328,140	\$2,328,140
Total Budget	\$19,992	\$45,800	\$20,056	\$2,715,847	\$2,801,695

g. Plan to Measure and Evaluate Environmental Progress and Results: To ensure timely project completion, CDC’s internal Brownfield Team and the EC, will meet quarterly to track project progress of outputs identified in 3.e. Progress and outputs will be tracked internally as well as reported in the ACRES database and quarterly reports to the EPA. Project expenditures and activities will be monitored quarterly against the four-year timeline. Site-specific information will be recorded in the ACRES database. Key performance indicators/outputs, such as the number of stakeholder meetings; QAPP; ABCA; cleanup plan developments; contractor procurements; and quarterly, annual, and closeout reports will be tracked. Additionally, outcomes like community participation, acres assessed, acres made ready for reuse, redevelopment dollars leveraged, and jobs created will be monitored. To address potential project delays, the CDC has contingency plans in place, including monthly communication with the EPA Project Officer and the development of a Corrective Action Plan, if necessary, to ensure the project is completed on schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability. a. Organizational Structure & b. Description of Key Staff: The White Mountain Apache Community Development Corporation (CDC) was established in 1981 under tribal rules and regulations and is overseen by a five-member board of directors composed of tribal members. The CDC employs 6 full-time and 19 seasonal staff and has expanded its mission from facilitating cabin donations to providing affordable housing, job training, and social services. The organization has extensive experience in contract administration and financial management, including contract monitoring, financial accounting, and performance reporting. **Ruby Altaha** will serve as the **Brownfield Program Director**. Ms. Altaha is the current CDC Executive Director and Project Director, with over 20 years of tribal government experience. She currently manages the successful FY2022 Brownfields Cleanup Grant for the Site 1 Abatement Area, as well as the Hawley Lake cabin rentals and the Low-Income Housing Tax Credit (LIHTC) program. She will oversee grant administration, including Cooperative Agreement compliance, ACRES input, and



White Mountain Apache Community Development Corporation FY2026 US EPA Brownfields Cleanup Grant

required reporting. **William Watt**, Maintenance Supervisor, will serve as the **Brownfield Program Manager**. Mr. Watt has been in this position for three years and is responsible for the cleanup and securing of cabins, as well as oversight of all maintenance activities at Hawley Lake. He will support day-to-day project coordination, contractor oversight, and implementation of cleanup activities. **Gary Gregg** will serve as the **Brownfield Program Finance Manager**. As CDC Accounting Technician, Mr. Gregg manages financial operations, including ASAP draw downs, account maintenance, invoice review, and resolution of account irregularities. He currently oversees the FY2022 Brownfields Cleanup Grant, a \$3.3 million EDA grant, and the USDA Rural Development Multifamily Housing Grant. An EC will assist with the technical portions of the project.

c. Acquiring Additional Resources: The White Mountain Apache Tribe will hire a qualified environmental contractor (EC) to support the technical and reporting aspects of the Brownfield Cleanup Grant, adhering to EPA's Professional Service procurement process and local contracting requirements. Throughout the project, additional resources or contractors will be acquired as needed.

Past Performance and Accomplishments. d. Currently Has or Previously Received an EPA Brownfields Grant: (1) Accomplishments: CDC was awarded \$500,000 through a FY2022 EPA Brownfields Cleanup Grant to abate rental cabins in the Site 1 Abatement Area. The original grant application identified abatement of 38 cabins as the primary output; however, due to cleanup efficiencies, CDC successfully abated 61 cabins, a 61% increase over the initial target. In addition to physical remediation, CDC prepared the Final ABCA, documented community comments and responses, held community meetings and other engagement activities, and developed key project documents including the Community Involvement Plan (CIP), Quality Assurance Project Plan (QAPP), Sampling and Analysis Plan (SAP), Health and Safety Plan (HASP), and Abatement Summary Report.

(2) Compliance with Grant Requirements: The CDC has fully complied with all work plan, schedule, and Cooperative Agreement terms and conditions. The organization prepared and updated the work plan to reflect additional output accomplishments, held regular meetings with the EPA Project Officer to discuss grant status and receive technical guidance, and ensured timely entry of outputs and property information into ACRES. All quarterly and annual reports were submitted on time and with appropriate detail, and contractors were procured using fair and open competitive requirements in accordance with 2 CFR §§ 200 and 1500. The original grant end date was September 30, 2025, but the performance period was extended to **October 31, 2025**. The CDC has until March 1, 2026, to submit the Project Closeout Report and drawdown the remaining funds. As of this application, **\$481,179.42 (96%)** has been expended, and the CDC anticipates full expenditure by the spending deadline. This performance demonstrates a strong record of timely, compliant, and effective grant management.



**White Mountain Apache Tribe
Community Development Corporation**

**FY26 Brownfield Cleanup Grant
Threshold Criteria**



**White Mountain Apache Community Development Corporation, AZ
FY2026 US EPA Brownfields Cleanup**

Threshold Criteria

1. Applicant Eligibility

- a. The White Mountain Apache Community Development Corporation (CDC) is an IRS designated 501(c)(3) nonprofit organization and is an eligible entity to apply for brownfields funding. The IRS issued a determination letter to the White Mountain Apache CDC in May 1983 stating the CDC was an exempt organization, but this document was destroyed in a fire; a letter dated April 12, 2000, documenting CDC's status as a 501(c)(3) organization is attached.
- b. The CDC is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

The CDC affirms that the proposed site (Site 2) has not received funding from a previously awarded United States Environmental Protection Agency (EPA) Brownfields Cleanup Grant.

The CDC received FY2022 Brownfields Cleanup funding to clean up Site 1 which consisted of 38 cabins in a portion of the Hawley Lake Recreational Area. The CDC abated the 38 cabins within the target area, and because the cleanup was completed efficiently and cleanup funds remained, EPA granted authorization to abate an additional 23 cabins outside the original target area. Subsequently, EPA confirmed CDC's eligibility to apply for a second Brownfields Cleanup Grant to abate additional cabins that are within the Hawley Lake Recreational Area (Site 2 Abatement Area). In an email dated August 21, 2024, the EPA Grant Project Officer confirmed that Region 9 legal counsel and other regional departments concluded that the additional cabins constituted an additional site and were, therefore, eligible for new funding through a FY2026 Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The CDC affirms that it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The White Mountain Apache Tribe (WMAT) has lived in the White Mountains for thousands of years, including the area that is now designated as the Fort Apache Indian Reservation. The reservation was established by Executive Order in 1891. Reservation land is held in trust for Native Americans by the United States government, but the beneficial interest remains with the tribe or can be transferred by the tribe to an individual through a mechanism known as an allotment. Therefore, legal title to land is conveyed by the tribe to an individual or organization by means of a restricted title that is subject to Bureau of Indian Affairs approval. Some rental cabins were donated to the CDC after land leases expired in 1984. Ownership of cabins not donated to CDC was granted to the CDC by the WMAT through a restricted title. All cabins have been owned by the CDC prior to December 1, 2021.

5. Basic Site Information

- a) Hawley Lake Recreational Area
- b) Multiple rental cabins within a 900-acre target area centered at a latitude of 33°59'14" N and a longitude of 109°44'52" W. The site is located in an unincorporated area and does



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not have an assigned address. The nearest town is McNary, Arizona, with a zip code of 85935.

6. Status and History of Contamination at the Site

- a) The site is contaminated with hazardous substances.
- b) Beginning in 1959, the WMAT granted 25-year ground leases to non-tribal members for lots surrounding Hawley Lake. Although there was no guarantee that the leases would be renewed, leaseholders constructed cabins and support structures on the lots. The leases were not renewed after the initial 25 years, primarily because the tribe wanted to preserve its cultural identity by allowing only tribal members to reside within its homeland and the tribe was suffering significant investment losses (on the order of several million dollars based on rental rates and property values for similar sites in the White Mountains area) due to the unreasonably low lease rates. Currently, all cabins are vacant, dilapidated, and in need of remediation of asbestos materials.
- c) The rental cabins were constructed between 1959 and 1978, during which time it was common for building materials to contain or consist of asbestos-containing materials (ACMs). There are also asbestos-cement water pipes on site. Prior asbestos surveys conducted on the site have confirmed the presence of ACMs.
- d) Over time, many remaining structures have deteriorated significantly due to insufficient funding for maintenance or abatement of asbestos hazards, as well as the natural aging of buildings constructed between 1959 and 1978. Some cabins have also become unsafe or partially collapsed after large trees fell on them, damaging roofs and walls. The unsafe cabins are presumed to contain ACMs due to the era in which they were built. Asbestos surveys of the cabins confirmed the presence of ACMs (defined as containing more than 1% by weight asbestos) in floor tile and mastic, roofing materials (shingles and felt), window caulking, and building filler material. Asbestos is also present in asbestos-cement pipe.

7. Brownfield Site Definition

The CDC affirms that the site is:

- a) NOT listed or proposed for listing on the National Priorities List (NPL);
- b) NOT subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into parties under CERCLA; and
- c) NOT a facility subject to the jurisdiction, custody, or control of the US government.

8. Environmental Assessment Required for Cleanup Grant Applications

Over the past five years, the CDC has completed extensive Phase II Environmental Site Assessment (ESA)–equivalent reports of the rental cabins and infrastructure within the Hawley Lake Recreational area using multiple leveraged funding sources. These funding sources and completed reports are as follows:

- WMAT Environmental Protection Office (EPO) CERCLA 128(a)-authorized Tribal Response Program (TRP): Asbestos survey of eight cabins (November 2019)
- EPA Targeted Brownfields Assessment (TBA): Asbestos survey of 51 cabins (July 2022)
- EPA Brownfields Technical Assistance: Infrastructure study – transite pipe quantity (June 2022)



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- Arizona Department of Environmental Quality (ADEQ) CERCLA 128(a)-authorized State Response Program (SRP) – Asbestos survey of 36 cabins (October 2023)
- ADEQ CERCLA 128(a)-authorized SRP – Asbestos survey of 88 cabins (October 2024)

9. Site Characterization

- a. Not Applicable.
- b. Not Applicable.
- c. The applicant is not a State or Tribal Environmental Authority, and the site will not be enrolled in a voluntary response program because no such program or equivalent program exists.
 - i. A letter from the WMAT EPO is attached that states the EPO affirms that the site is not eligible to be enrolled in a Tribal voluntary response program because no program or equivalent program exists. The letter clearly indicates that the information is for the FY2026 Cleanup Grant application and not a previously submitted application.
 - ii. The EPO affirms that an Environmental Professional (as defined in 40 CFR § 312.10) has certified that there is a sufficient level of site characterization from the environmental site assessment performed to date for remediation work to begin on the site.

10. Enforcement or Other Actions

The CDC affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The CDC affirms that the site does not require property-specific determination to be eligible for EPA Brownfields Grant funding.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(1) Indian Tribes

Not Applicable.

(2) Alaska Native Village Corporations and Alaska Native Regional Corporations

Not Applicable.

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

Not Applicable.



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ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

Not Applicable.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

Not Applicable.

Non-Publicly Owned Sites Acquired Prior to January 11, 2002

- a. Some of the cabins were donated to the CDC after land leases expired in 1984. Ownership of cabins not donated to the CDC was granted to the CDC by the WMAT through a restricted title. All cabins have been owned by the CDC prior to December 1, 2021.
- b. Leases and related documentation have been lost or destroyed by fire; therefore, the CDC is unable to identify the exact dates that leases were terminated. The CDC estimates that 25-year land leases were granted to nonmembers between 1959 and 1963 and leases expired between 1984 and 1988, at which time the CDC took control of the cabins.
- c. Land leases granted to non-tribal members expired between 1984 and 1988. Prior to and following lease expiration, the WMAT visually inspected the cabins and area immediately surrounding the area for the presence of hazardous substances and petroleum products and/or indications of releases of these constituents. Leaseholders were requested to remove hazardous substances and petroleum products and, if they refused, these items were removed and properly disposed by the Tribe. A commonly accepted standard for conducting environmental due diligence was not in use at the time the land leases expired. ASTM released the first consensus standard, the ASTM Standards on Environmental Site Assessments for Commercial Real Estate (ASTM 1527-93), in 1993, about five to nine years after the leases expired. Therefore, the CDC affirms that the environmental due diligence conducted for the site by the WMAT was customary at the time of acquisition.
- d. The CDC affirms that hazardous substance disposal occurred prior to the CDC's property acquisition.
- e. The CDC affirms that it has not caused or contributed to any release of hazardous substances at the site.
- f. The CDC affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- g. The CDC has taken the following reasonable steps taken with respect to hazardous substances found at the site to:
 - i. **Stop any continuing releases.** CDC conducted asbestos surveys of rental cabins and soil to identify the presence of ACMs to facilitate efforts to control and stop continuing releases. CDC has locked the cabins and affixed plywood over windows to prevent unauthorized entrance, ongoing vandalism, and weather deterioration to the cabins. "No Trespassing" signs with warning regarding the presence of asbestos-containing materials were posted on the cabins. The CDC regularly inspects the cabins to resecure the cabins, as necessary.



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- ii. **Prevent any threatened future release.** The CDC has locked the cabins and affixed plywood over windows to prevent unauthorized entrance into the cabins. “No Trespassing” signs with warning regarding the presence of asbestos-containing materials were posted on the cabins. The CDC regularly inspects the cabins to resecure the cabins, as necessary. The CDC is requesting Brownfields Cleanup Grant funding to abate ACM and permanently prevent threatened future releases.
- iii. **Prevent or limit exposure to any previously released hazardous substance.** The CDC conducted asbestos surveys of rental cabins and soil to identify the presence of ACMs to facilitate efforts to control and stop continuing releases. The CDC has locked the cabins and affixed plywood over windows to prevent unauthorized entrance, ongoing vandalism, and weather deterioration to the cabins. “No Trespassing” signs with warning regarding the presence of asbestos-containing materials were posted on the cabins. The CDC regularly inspects the cabins to resecure the cabins, as necessary.

iv. SITES WITH HAZARDOUS BUILDING MATERIAL THAT IS NOT RELEASED INTO THE ENVIRONMENT

The CDC affirms that there have been no releases or threats of release of hazardous substances from building materials into the outdoor environment.

b. Property Ownership Eligibility – Petroleum Sites

Not Applicable.

13. Cleanup Authority and Oversight Structure

- a. Site cleanup will be overseen by the WMAT EPO. Asbestos abatement will be conducted in accordance with applicable Occupational Safety and Health Administration (OSHA) and EPA rules and regulations. ACMs will be properly abated and handled by a certified contractor registered with the Arizona State Registrar of Contractors; transported off-site in accordance with local, state, and federal rules and regulations; and disposed at a landfill certified by the ADEQ to accept ACMs. Site abatement, air monitoring, and clearance will be overseen by an environmental consultant with appropriate Asbestos Hazard Emergency Response Act (AHERA) and EPA training and experience. The abatement contractor and environmental consultant will be selected through a competitive process managed by the CDC Procurement Officer. The White Mountain Apache Tribal Employment Rights Office (TERO) will be engaged to ensure that it provides and promotes equitable and legitimate employment opportunities for tribal members. The CDC will comply with the competitive procurement provisions of 2 CFR §§ 200.317–200.327 by developing and issuing a Request for Proposal (RFP) with clearly defined scope of work; advertising the RFP to solicit competitive responses; encouraging disadvantaged business participation; and developing an unbiased, best-value selection process. Site work will not be conducted prior to selection and contracting of the contractor and environmental consultant.
- b. Neighboring and adjacent properties are controlled by the WMAT. The tribe fully supports completion of this project and has agreed to allow the CDC to enter neighboring and adjacent properties and use roadways to access the site and neighboring and adjacent properties.



14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

The CDC announced its intent to apply for cleanup funding for the cabins located in the Hawley Lake Recreational Area on January 7, 2026. A draft ABCA for the site and this application were made available for public review and comment, upon request. These documents summarized information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered; and
- the proposed cleanup.

b. Community Notification Ad

A community notification ad requesting public input was published through an email to 599 community members on January 7, 2026. A community notification ad was also published on January 9, 2026, in the *Fort Apache Scout*, the local newspaper, and through the CDC website at <https://www.wmat.us>. The notice included the date, time, and location of the public meeting. A copy of this grant application, including the draft ABCA, was made available for public review and comment upon request.

c. Public Meeting

A presentation was made during a public meeting on January 9, 2026, at the White Mountain Apache Tribal Executive Conference Room at 1:00 p.m. The CDC documented participant attendance and comments received during the meeting.

d. Submission of Community Notification Documents

The following community notification documents are included as an attachment to this proposal:

- a copy of the draft ABCA;
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application and that notification to the public occurred at least **14 days** before the application was submitted to the EPA;
- the comments or a summary of the comments received;
- meeting notes from the public meeting; and
- meeting sign-in sheets/participant lists.

15. Contractors and Named Subrecipients

Not Applicable.



WHITE MOUNTAIN APACHE TRIBE
Environmental Protection Office



January 7, 2026

RE: Hawley Lake Recreational Area Rental Cabins – FY2026 EPA Brownfields Cleanup Grant Application

Dear Mrs. Ruby Altaha:

The White Mountain Apache Tribe Environmental Protection Office (EPO) acknowledges the White Mountain Apache Community Development Corporation's (CDC) intent to submit a Fiscal Year 2026 Brownfields Cleanup grant application to the U. S. Environmental Protection Agency (EPA). CDC has developed an application requesting site-specific federal Brownfields Cleanup funding for the Hawley Lake Recreational area near McNary, Arizona. Grant funding will be used to properly abate, transport, and dispose asbestos-containing building materials (ACBM) from their affected cabins.

EPO affirms that the area at Hawley Lake Recreational Area is not eligible to be enrolled in a Tribal voluntary response program because no program or equivalent program exists. In addition, EPO affirms that an Environmental Professional (as defined in 40 CFR § 312.10) has certified that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin at the site.

EPO fully supports this grant application, and we are committed to providing technical guidance to CDC as it conducts this site cleanup and redevelopment. We look forward to working with EPA on this important project. Should you have any comments or questions, please contact me at (928) 338-4325 or brendapusher-begay@wmat.us. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brenda Pusher-Begay".

Brenda Pusher-Begay, Environmental Manager
WMAT Environmental Protection Office