



**Ounalashka Corporation**  
PO Box 149  
Unalaska, Alaska 99685-0149  
(907) 581-1276 | [ounalashka.com](http://ounalashka.com)



R10-26-A-002

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

Ounalashka Corporation is pleased to submit this proposal for FY2026 Brownfields Community-Wide Assessment for States and Tribes Grant funding. Below we provide the information requested.

**1. Applicant Identification:**

Ounalashka Corporation  
Physical Address: 400 Salmon Way, Unalaska, Alaska 99685-0149  
Mailing Address: P.O. Box 149, Unalaska, Alaska 99685-0149

**2. Website URL:** <https://ounalashka.com/>

**3. Funding Requested:**

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

**4. Location:**

- (a) City: Unalaska
- (b) County: Unorganized Borough of Alaska
- (c) State or Reservation: Alaska

**5. Target Area & Priority Site Information:** The table below identifies the target areas and priority sites. These sites do not have addresses associated with them so parcels numbers have been provided instead. All the sites identified are Formerly Used Defense Sites (FUDS). A figure of the target areas is attached.

Target Area Name	Priority Site Names
<b>Xatachxan Lagoon</b>	Four contiguous parcels (parcel #s 0405500, 0405520, 0405240, and 0405525) located on Airport Beach Road, Unalaska. Areas of concern on these parcels include: <ul style="list-style-type: none"><li>• Building 909 (former electrical warehouse)</li><li>• Igloo Magazine No. 1 (former munitions storage bunker)</li><li>• Igloo Magazine No. 2 (former munitions storage bunker)</li><li>• Former dumping area (disposal area used by the military)</li></ul>
<b>Pyramid Valley</b>	Two contiguous parcels (parcel #s 0605800 and 0503300) located on Pyramid Creek Road, Unalaska. Areas of concern on these parcels include: <ul style="list-style-type: none"><li>• Battery Tactical #2 (former artillery battery storage)</li><li>• Tank Area (former above-ground storage tank area)</li></ul>



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Target Area Name	Priority Site Names
<b>Bunker Hill/Little South America</b>	Eleven contiguous parcels (parcel #s 05450, 408350, 408300, 408180, 408450, 408240, 408245, 502300, 408400, 407100, and 407050) located on Little South America Road, Unalaska. Areas of concern on these parcels include: <ul style="list-style-type: none"> <li>• Building 5181 (former military maintenance building)</li> <li>• Building 5264 (former officer’s recreation hall)</li> <li>• Asbestos Warehouse (former powerhouse building that also stored asbestos during 1980s abatement and demolition projects)</li> </ul>

**6. Contacts:**

(a) Project Director:

Name: Natalie Cale, CEO/General Counsel  
 Phone: 907-947-7105 | Email: [ncale@ounalashka.com](mailto:ncale@ounalashka.com)  
 Mailing Address: 745 West 4th Avenue, Suite 500, Anchorage, Alaska 99501

(b) Chief Executive/Highest Ranking Elected Official:

Name: Wendy Svarny-Hawthorne, Chairwoman of OC Board of Directors  
 Phone: 907-581-1276 | Email: [WSvarny-Hawthorne@ounalashka.com](mailto:WSvarny-Hawthorne@ounalashka.com)  
 Mailing Address: P.O. Box 149, Unalaska, Alaska 99685

**7. Population:** OC has 527 shareholders but also represents the Q-Tribe (with 1,200 members). The project will benefit all residents within the City of Unalaska, which has approximately 5,251 residents (U.S. Census Bureau, American Community Survey 5-Year Estimates) but a peak population of up to 10,000 during fishing season.

**8. Other Factors:**

Other Factors Criteria	Page #
Community population is 15,000 or less.	1 & 5
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	5*
The priority site(s) is impacted by mine-scarred land.	NA
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1 & 2**
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar,	2, 3 & 4***



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Other Factors Criteria	Page #
or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	NA
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority sites within the target areas.	NA
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2015 or later) or is closing.	NA

NA = Not applicable

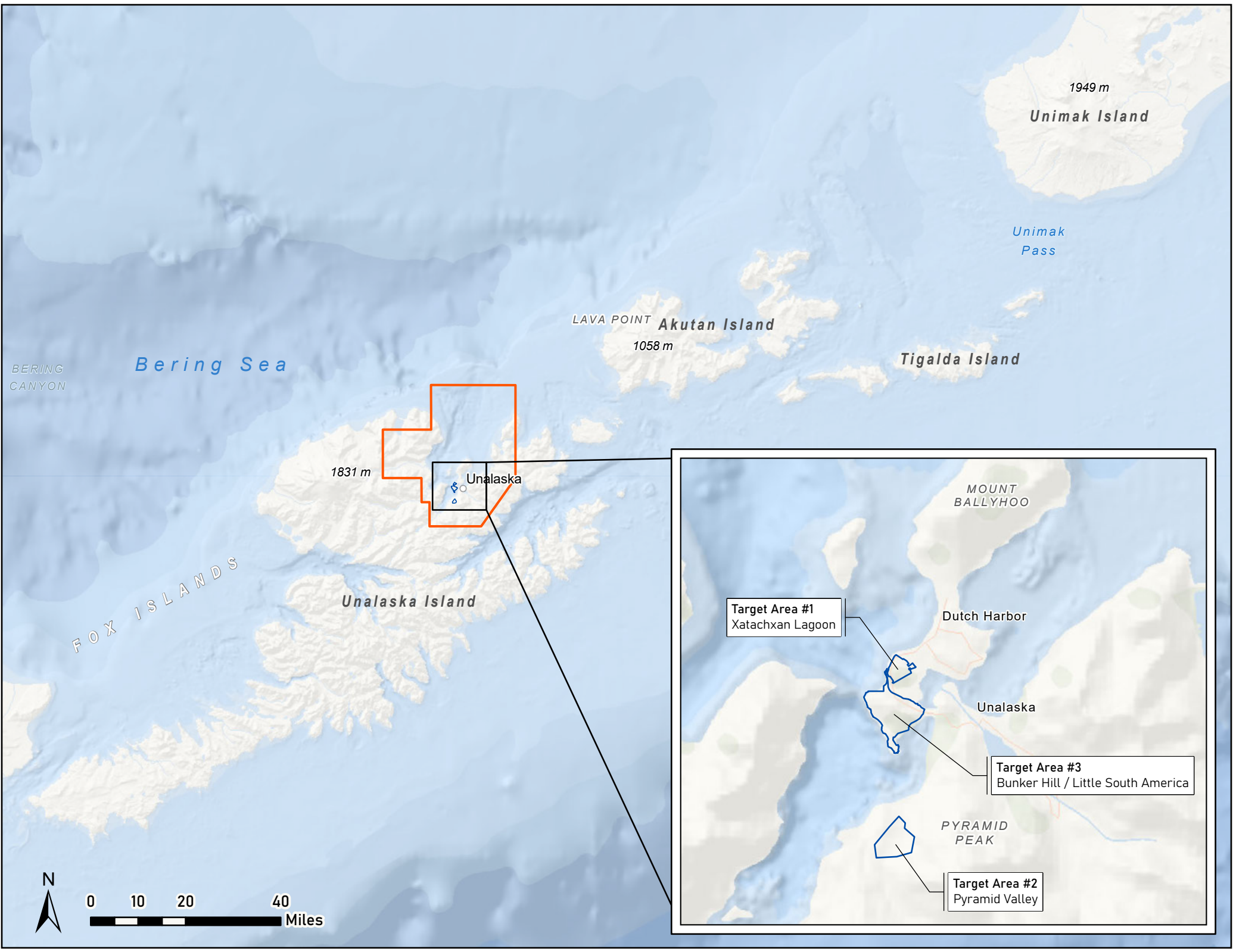
*\*The Qawalangin Tribe of Unalaska is a federally recognized Tribe.*

*\*\*All the target areas are adjacent to waterbodies. Xatachxan Lagoon is adjacent to Margaret Bay. Icy Creek and Icy Lake are located in Pyramid Valley. Bunker Hill/Little South America is a peninsula surrounded by water on three sides.*

*\*\*\*The Makushin Volcano Geothermal project is discussed on pages 2-4 of the narrative.*

**9. Letter from the State or Tribal Environmental Authority:** A letter of acknowledgement from the Alaska Department of Environmental Conservation is attached.

**10. Releasing Copies of Applications:** Contact information for project partners (Sections 2.e-2.f) should be redacted prior to release of this application.



1949 m  
**Unimak Island**

Unimak  
Pass

LAVA POINT **Akutan Island**  
1058 m

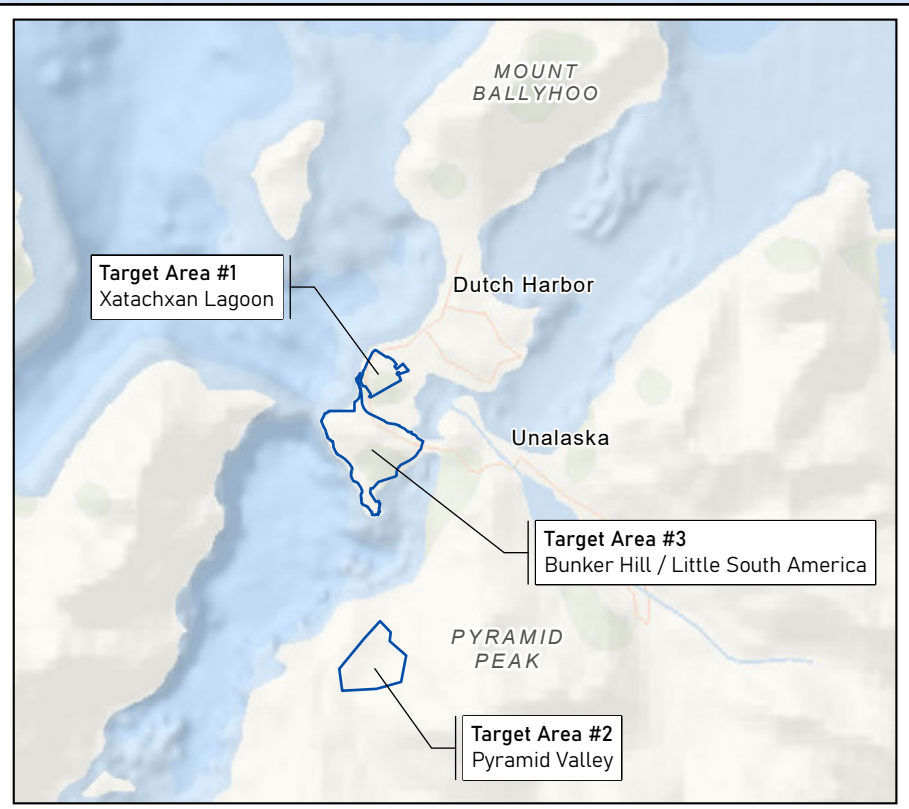
**Tigalda Island**

BERING CANYON  
**Bering Sea**

1831 m  
**Unalaska**

FOX ISLANDS

**Unalaska Island**



**Target Area #1**  
Xatachxan Lagoon

Dutch Harbor

MOUNT  
BALLYHOO

Unalaska

**Target Area #3**  
Bunker Hill / Little South America

PYRAMID  
PEAK

**Target Area #2**  
Pyramid Valley



0 10 20 40  
Miles



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

## Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

P.O. Box 111800  
Juneau, AK 99811  
Main: 907-465-5250  
Fax: 907-465-5245  
[www.dec.alaska.gov](http://www.dec.alaska.gov)

January 21, 2026

ELECTRONIC MAIL ONLY

Natalie Cale, Chief Operation Officer/General Counsel  
Ounalashka Corporation  
400 Salmon Way  
P.O. Box 149  
Unalaska, AK 99501  
[ncale@ounalashka.com](mailto:ncale@ounalashka.com)

RE: State Environmental Authority Letter

Dear Ms. Cale,

This letter acknowledges that the City of Unalaska notified the Alaska Department of Environmental Conservation (DEC), the designated State Environmental Authority, that it will be submitting a 2026 Brownfields Assessment Grant application to the United States Environmental Protection Agency (EPA).

DEC Brownfields is committed to assisting Alaska communities in their efforts to address brownfields properties. We believe the proposal to be a positive and necessary step in addressing brownfields in Unalaska. We are aware that the Ounalashka Corporation is targeting Xatachxan Lagoon, Pyramid Valley and Little South America sites with an emphasis on selecting sites that once addressed can support new housing opportunities (affordable housing & workforce housing). Receiving an assessment grant from the EPA would greatly help the Ounalashka Corporation in assessing numerous brownfield properties and begin addressing and preparing these sites for reuse.

This letter establishes the Ounalashka Corporations compliance with the notification requirements for EPA Brownfield Assessment Grants. We wish the Ounalashka Corporation well on its pursuit of EPA assistance and success in addressing priority brownfields properties in your community.

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

Sincerely,

A handwritten signature in cursive script that reads "Kathleen Galau".

Kathleen Iler-Galau  
Environmental Program Specialist  
(907) 465-5206  
P.O. Box 111800  
Juneau, AK 99811

Electronic cc: Marc Thomas, DEC  
Flannery Ballard, DEC  
Julie Fix, DEC

Andrea Pederson, Montrose  
Terri Griffith, U.S. EPA  
Madison Saunders-Curry, U.S. EPA.

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION:**

**1.a. Overview of Brownfield Challenges and Description of Target Areas: Ounalashka Corporation (OC),** a legally recognized Alaska Native Village Corporation (ANVC), is entrusted with the lands of the **Qawalangin Tribe of Unalaska (Q-Tribe)**. The geographic boundary for this grant includes the 115,200 acres of land owned by OC on Unalaska and Amaknak Islands (Islands) situated near the center of the Aleutian Islands located offshore in southwest Alaska with the Bering Sea to the north and the Pacific Ocean to the south. The Islands include 80% of the urbanized area of the City of Unalaska (City; pop. 5,251) and are connected by a 500-foot long bridge. The City occupies a 210-square-mile area spanning the Islands and is the westernmost population center of the US, the westernmost international container terminal in the US, and the largest fishing port in the US. The physical isolation of the area is highlighted by the 800-mile distance from the City to the Municipality of Anchorage (the largest city in Alaska) where the nearest hospital is located. This extreme isolation is one of many factors shaping the area's extraordinary brownfields challenges. Amaknak Island contains 59% of the City's population which occupies <3% of its land area.<sup>a</sup> The City is also home to 81% of the population living within the Aleutians West Census Tract (CT).

The Aleutian Islands are among the longest inhabited native lands in North America. The original inhabitants, the Unangan, meaning "seasiders," crossed the Bering Land Bridge 12,000 years ago from Siberia and have lived on Unalaska and Amaknak Islands for at least 9,000 years. The US purchased Alaska from the Russian Empire in 1867. An influx of American settlers came to Unalaska during the Alaska Gold Rush due to its coaling station, and again with the construction of the Dutch Harbor Naval Operating Base and Fort Mears, which were completed in 1941. World War II (WWII) precipitated what is one of the most profound examples in US history of environmental consequences resulting from governmental policies. In spite of having lived on the islands for over 9,000 years, and having been formally recognized as US citizens since the purchase of Alaska by the US, attacks by Japanese warplanes in 1942 led to the forced relocation of Unangan residents and their internment for three years in squalid camps where nearly 10% died prior to their release following the war.<sup>b</sup> Their lands were seized by the military, the buildings and homes burned, the villages and hundreds of archaeological sites leveled with bulldozers, and the land used to construct military facilities that at their peak included more than 2,000 buildings and hosted 65,000 military personnel. The wartime use subjected Unangan lands to an extraordinary pollution burden with enormous fuel tank farms constructed to support the refueling of ships and planes, as well as over one thousand under- and above-ground storage tanks (USTs/ASTs) were installed to supply heating oil. Wastes were disposed of haphazardly with practices that included placement of drums on frozen lakes in winter, where they would sink to the lake bottoms during the spring thaw.

The seizure of lands by the US military was partially redressed in 1971 by the Alaskan Native Claims Settlement Act (ANCSA), which led in 1973 to the formation of Alaskan Native Village Corporations, including OC. The Q-Tribe lands allocated to OC include over 90% of the areas utilized by the military during WWII and include 109 sites within the City currently in the Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Database.<sup>c</sup>

The brownfields challenges include: (1) large number of contaminated sites burdening a small community; (2) large size and complexity of contamination issues; (3) the complex web of rules and regulations applicable to Formerly Used Defense Sites (FUDS), which include sites impacted by acts of war on Unalaska; (4) impacts to potential historical archaeological artifacts; (5) remote location, harsh weather conditions, and high mobilization costs; (6) high cleanup/disposal costs associated with transporting contaminated media off-island; and (7) redevelopment challenges associated with a remote location in the Bering Sea (and the small market, high construction costs, and other factors related to this isolation).

EPA Grant funding will be used to advance the reuse and redevelopment of brownfield sites located within three primary target areas (TAs): **Xatachxan Lagoon, Pyramid Valley, and Bunker Hill/Little South America (LSA).**

• **Xatachxan Lagoon ("X Lagoon")** is located in the downtown area of Unalaska adjacent to *Margaret Bay* on Amaknak Island. The TA contained a naturally occurring lagoon<sup>d</sup> that was incrementally backfilled by the military to facilitate access to military emplacements and provide additional storage. The source of imported fill material is unknown. An area of the filled in lagoon served as a dumping area and a drainage pond and ditch were constructed to drain into Margaret Bay. The TA is largely vacant with the exception of a small storage area for shipping containers and crab pots. The TA's prime location in a downtown area make it highly desirable for redevelopment but concerns of contamination are preventing projects from moving forward.

<sup>a</sup> City of Unalaska, *Comprehensive Plan 2020 – Unalaska, Alaska*. [Link](#).

<sup>b</sup> Aleutian Pribilof Islands Association, *History*. [Link](#).

<sup>c</sup> Division of Spill Prevention and Response ([alaska.gov](#)). Accessed 01/14/26.

<sup>d</sup> An area of relatively shallow, quiet (often brackish) water situated in a coastal environment and having access to the sea but often separated from the open marine conditions by a barrier.

- **Pyramid Valley** occupies a 1.5 square mile area on Unalaska Island one mile south of Unalaska's downtown. The shoreline at the end of the Valley is occupied by two seafood processing plants. The Valley was a support area for the US Army and Navy during WWII, with over 100 buildings that included a hospital, garages, a maintenance shop, mess halls, a power plant, living quarters, and other buildings of unidentified uses. Due to "area-wide" contamination concerns, the Valley as a whole is ranked as the 3rd highest priority "site" for additional assessment and mitigation work in the Q-Tribe's 2022 **Strategic Project Implementation Plan (SPIP)**. The Valley contains two active ADEC sites, and 26 mapped debris areas. Pyramid Creek Road runs through the center of the Valley providing gated access to *Icy Creek* and *Icy Lake*, which both serve as important drinking water sources for the City and fresh water sources for the fish processing facilities located along Captains Bay Road. The Valley is a priority due to its zoning, existing road and utilities access, and favorable terrain for residential development.
- **Bunker Hill/LSA** is a peninsula at the south end of Amaknak Island whose shape mimics the South American continent and which is *surrounded by water on three sides*. It is the location of the Carl E. Moses Boat Harbor (which serves as the base of operations for the region's crab fishing fleet, and which is featured on television show "Deadliest Catch"). During WWII, it was occupied by artillery guns, ammunition bunkers, fire control stations, and several tunnels. The west side of Bunker Hill is the planned future location for a new cruise ship dock to be developed by OC. The new dock would serve dual purpose for cruise ships as well as supporting development of the Makushin Volcano Geothermal Project located directly across Unalaska Bay by providing an anchor point and staging location for transporting materials and personnel. The Makushin Volcano Geothermal Project is a \$250M project led by OC that will construct a 30 megawatt (MW) geothermal energy plant on the slope of Makushin Volcano and supply renewable energy to the City via a 11-mile transmission line and dual 3-mile undersea cables.

**1.b. Description of Priority Brownfield Sites:** All three TAs were subject to intensive use by the military during WWII and are impacted by significant "area-wide" contamination concerns (including unexploded ordinance [UXO], undocumented waste disposal areas, and widespread impacts to sediment in surface water bodies) that are largely uninvestigated, as well as contamination associated with individual former military buildings that have been subject to some investigation and cleanup activities through the Department of Defense (DOD) Environmental Restoration Program (DERP) and FUDS Program established in 1986. Information for nine priority brownfield sites is provided below. **All of the sites listed below are FUDS owned by OC and transferred by the US Government to OC in the 1970s under ANCSA.** All three of these TAs, and most of the sites listed below are identified as priorities for environmental assessment and cleanup by the Q-Tribe in their 2022 SPIP prepared as part of the Tribe's Native American Lands Environmental Mitigation Program (NALEMP).

- The **X Lagoon TA** (identified in the Q-Tribe's SPIP as part of the former Fort Mears Army Base) is comprised of four contiguous parcels totaling 19.5-acres that were part of the Fort Mears complex bombed during WWII. During its period of active military operation, X Lagoon was developed with **Building 909** (an electrical warehouse), **Igloo Magazine No. 1** and **Igloo Magazine No. 2** (two munitions storage bunkers), and its hills contained an extensive network of trenches, pits, fox holes, and defensive fighting positions. A surface pond and associated drainage ditch are present and suspected to be a historical **dumping area** for the military. In 2025, OC completed a Phase I Environmental Site Assessment (ESA) as well as a LiDAR, Multi-Spectral and Aerial Imagery Survey for Phase II ESA planning. A Phase II ESA Work Plan (currently undergoing review by EPA and ADEC) has been prepared for fieldwork to be funded under this grant.
- The **Pyramid Valley TA** (identified in the Q-Tribe's SPIP) is comprised of two contiguous parcels totaling 90 acres. Individual sites of concern include **Building 5181**, a former maintenance building from which solvent, heating oil, and waste oil USTs were removed. The building remains in place as well as contaminated soil underlying the building. **Building 5264** served during WWII as an officer's recreation hall. The building has been demolished but the foundation remains and covers soil with significant petroleum impacts from a leaking UST (LUST). The "**Asbestos Warehouse**" is a former powerhouse building that remains in place and whose name references both asbestos insulation materials present on a boiler and piping inside of the building and a large quantity of additional asbestos-containing materials (ACMs) reportedly placed in the building by the US Army Corp of Engineers (USACE) during abatement and demolition of other buildings in the Valley (which occurred from the 1950s through 1980s). All three buildings are located adjacent to Pyramid Valley Road and represent eye sores as well as safety hazards impeding the desired future residential development of this area. In 2024, the City of Unalaska completed a Phase I ESA on behalf of OC to identify Recognized Environmental Conditions (RECs) requiring further investigation. The City also funded a LiDAR, Multi-Spectral and Aerial Imagery Survey of the TA. The Phase I ESA and remote sensing survey data will be used to inform development of a Phase II ESA Work Plan.
- The **Bunker Hill/LSA TA** (identified in the Q-Tribe's SPIP) is comprised of 11 parcels totaling 178 acres. **Battery Tactical #2** is on the south and west sides of Bunker Hill and was an area primarily used as an artillery battery

during WWII. Features that remain include deteriorating WWII plotting rooms/fire control stations, bunkers, artillery stations, four collapsed Quonset huts, three warhead tunnels with collapsing roof structures, and various hazardous debris scattered throughout the peninsula. The **LSA Tank Area** includes USTs and pipelines surrounded by petroleum stained soils. Some tanks appear to have rolled downhill, causing additional releases as crushed and decaying vegetation were observed beneath the tanks. A rock quarry is also present near the south end of the peninsula. The TA was identified as a priority in the Q-Tribe's SPIP due to the lack of previous assessment activities, visible contamination, the ineligibility for work under the FUDS Program, and high redevelopment potential.

**1.c. Identifying Additional Sites:** In 2020, OC executed a Trilateral Agreement with the City of Unalaska and Q-Tribe to foster improved coordination of efforts related to public health, environmental management, economic development, and infrastructure. Through this partnership, a list of priority sites is maintained and reviewed by the group during monthly trilateral meetings. The list of sites are ranked in order of priority for assessment and cleanup and include over a dozen sites beyond what is identified in this grant application. Should additional funds remain, OC will work with the City and Q-Tribe to prioritize remaining funding for the sites on this list. Additionally, in 2023 EPA established the Contaminated ANCSA Lands Inventory database which identifies 1,183 contaminated sites in Alaska. Of these 1,183 sites, 10% (110 sites) are in Unalaska further demonstrating the significant environmental burdens facing the community. The land area of Unalaska only occupies 0.02% of the State, yet 10% of contaminated ANCSA lands identified by EPA are located in this small area. The list of sites in need of assessment funding in Unalaska is extensive, and OC has successfully worked with the City and Q-Tribe to develop a process for site prioritization, including reviewing and prioritizing the sites featured in this grant application.

**1.d. Reuse Strategy & Alignment with Revitalization Plans:** Projected reuses for the three TAs include a mix of affordable housing and commercial use as well as development of alternate energy sources. These uses are consistent with the City of Unalaska's *2020 Comprehensive Plan* and *2020 Housing Plan*, the Q-Tribe's *2022 SPIP*, and OC's *2025 Land Plan*. Below we summarize how the reuse strategies for each site align with local priorities.

- The ***X Lagoon TA*** is identified as a priority project in the Q-Tribe's *SPIP* (as part of the former Fort Mears Army Base) and OC's *Land Plan* as a high priority for cleanup. Potential uses identified by the community include housing or commercial/industrial uses depending on environmental conditions. The community would like to conduct reuse planning activities for this TA once a Phase II ESA is completed and environmental issues are quantified.
- The ***Pyramid Valley TA*** is identified in the Q-Tribe's *SPIP* as a high priority site for assessment and cleanup of derelict military structures and hazardous debris. The plans for a housing development in this area are consistent with the City's *2020 Housing Plan* which identified this area as one of four priority "long-term housing sites." A key factor cited (the planned upgrade of infrastructure for a new water plant) has now been completed as well as the provision of high-speed cable internet. OC's *2025 Land Plan* also identifies areas of this TA for enhancing recreational amenities (it a popular hiking area for locals) and greenspace. As described in Section 1.b, the City completed a Phase I ESA and remote sensing survey for this TA to identify the RECs and areas of concern that require further investigation and inform Phase II ESA activities to be conducted by OC under this grant.
- The ***Bunker Hill/LSA TA*** is identified in the Q-Tribe's *SPIP* for several redevelopment opportunities. Projected reuses identified in the City's *2020 Comprehensive Plan* for the south end of the TA include marine-oriented commercial uses compatible with the Carl E. Moses Boat Harbor that supports the crab fishing fleet. The west side of the peninsula is the planned location for a new cruise ship dock being developed by the OC (these plans also address community desires identified in the City's *2020 Comprehensive Plan*). The new dock will also support development efforts for the Makushin Volcano Geothermal Project by providing an anchor point for transporting materials and personnel directly across Unalaska Bay (this would reduce travel times by more than half of what they currently are from vessels departing from the opposite side of the island). OC, the City and Q-Tribe are working together to transition the community's electric power production from diesel generation to renewable energy sources. The Q-Tribe has received \$2.75M in grants and congressional funds to conduct geophysical and remote sensing studies and permitting activities (work is currently underway) to plan for development. In addition to the above, OC's *2025 Land Plan* includes priorities for addressing contamination to restore parts of the land for greenspace/recreation and subsistence activities (berry picking and fishing). OC will use this grant to fund Phase I/II ESA and cleanup planning activities necessary to move these projects forward.

**1.e. Outcomes & Benefits of Reuse Strategy:**

- ***Direct & Indirect Economic Benefits:*** All the projects described herein will have significant direct and indirect economic impacts. Housing is a key component of planned reuses in two of the TAs (***Pyramid Valley*** and ***X Lagoon***) and the lack of healthy and affordable housing has been repeatedly identified as a key obstacle for economic

development. The City's 2020 *Comprehensive Plan* included the following statement: "More housing – and more affordable housing – needs to be created within the City limits. This is the key to our future, without which Unalaska will not be able to retain its current residents or accommodate additional residents. Therefore, over the next ten-years it will be essential to make more land available for the development of quality, affordable housing." Development of housing results in direct economic benefit from construction, but in Unalaska, the indirect benefits are more important, as housing is a key requirement for nearly every major economic development goal. The housing shortage is impacting residents, the City, and its major employers alike. In community surveys conducted for the 2020 *Housing Plan*, seafood processing companies and the US Coast Guard cited the lack of housing as a key concern. The City and School District are having extreme challenges in recruiting and retaining staff due to the lack of housing. The inability to hire or retain teachers, doctors, and other essential workers threatens the quality of life for the entire community and adds to the overall staffing/recruitment challenges for local employers. Similarly, the cruise ship dock planned in the **Bunker Hill/LSA TA** will result in both short-term and long-term economic benefits, from the anticipated \$50M initial construction project, and continuing with increased docking fees from the ships and local spending by visitors on the ships. The Makushin Volcano Geothermal Project will result in an initial estimated \$250M construction project, and arrays of spin-off projects by businesses interested in utilizing a reliable renewable energy source (such as greenhouses growing local produce year-round and increasing access to healthy foods).

- Improving Resilience to Extreme Weather Events: Coastal erosion in Alaska differs from erosion patterns observed in the continental US and, being an island subject to the harsh climate of the Bering Sea (intense winds, large waves, and sea ice formation), Unalaska is at the forefront of this issue. Fueled by rising temperatures, the combined forces of wave action, sea ice loss, glacial retreat, and permafrost thaw jeopardize Unalaska's coastlines that are primarily composed of soft, easily erodible sediment. An increase in the frequency and intensity of storms in Unalaska is eroding coastlines and impacting OC's lands and the City's right-of-ways. The City is currently leading efforts for a study to investigate and plan for addressing Unalaska's coastal erosion vulnerabilities. Using EPA Grant funds to conduct environmental investigations in upland areas (such as **Pyramid Valley** and **Bunker Hill/LSA**) and inland areas (such as **X Lagoon**) support efforts to build community resiliency by directing development away from sensitive coastlines and planning for the future relocation of homes and businesses impacted by erosion.
- Facilitating Renewable Energy Projects: The Makushin Volcano Geothermal Project (located across the bay from the **Bunker Hill/LSA TA**) will be the largest geothermal energy project in Alaska and something OC, the City and Q-Tribe have put forth extensive efforts for planning. OC, the City, and Q-Tribe are committed to transitioning the community's electric power production from diesel to geothermal to reduce the community's current dependence on 3+ million gallons of diesel per year. The transition from diesel to geothermal will also bring energy rates down for the community.
- Greenspace Creation & Preservation: OC's 2025 *Land Plan* includes enhancing recreational amenities (trails and greenspace) in **Pyramid Valley** as it is a common place for locals to hike. **Bunker Hill/LSA** was traditionally an area that supported local subsistence via access to fishing in the bay and berry picking. OC's 2025 *Land Plan* includes priorities for addressing contamination to restore parts of the land for greenspace/recreation and subsistence.

**1.f. Resources Needed for Site Reuse:** In 2020, OC executed a Trilateral Agreement with the City and Q-Tribe to foster improved coordination of efforts related to public health, environmental management, economic development, and infrastructure. This includes collaboration in securing funding related to brownfields. Therefore, OC's access to monetary funding is not limited only to programs for which it is eligible but includes programs for which the City or Q-Tribe are eligible. OC will work in collaboration with the Q-Tribe and City to pursue the following:

Funding for Assessment and/or Cleanup:

- **EPA Contaminated ANCSA Lands Grant**: OC can apply to this EPA program to further site investigation and cleanup activities for sites contaminated prior to conveyance from the US Government to OC. OC has successfully done this twice to further investigation and cleanup of priority sites where initial investigations or work plans were developed using OC's FY23 CWAGST Grant. OC completed a Phase I ESA, Phase II ESA Work Plan, and Section 7 and 106 Consultations under the CWAGST Grant for the CMA Dock site and then successfully applied to Contaminated ANCSA Lands for funding to conduct the Phase II ESA and cleanup.
- **EPA Brownfield Cleanup Grants**: A priority for implementation of the CWAGST Grant is to use the grant to complete Phase I and II ESA and cleanup planning activities needed to position priority sites for future Cleanup Grant applications. OC was successful in using its FY23 CWAGST Grant to investigate the Strawberry Hill Landfill Asbestos Waste Cell and then use the information to secure a \$2M Cleanup Grant to facilitate excavation and removal of friable asbestos.

- **DOD NALEMP:** Since 2000, the Q-Tribe has received biannual funding from NALEMP to perform mitigation activities on Tribal lands (nearly all on sites owned by the OC). Assessment and cleanup are eligible activities.
- **USACE FUDS Program:** The FUDS Program has been a primary source of funding for demolition, assessment, and cleanup activities performed on OC lands, and will continue as a resource in the future. Issues with FUDS include: (1) limited funding (appropriations of \$250M are equal to 2% of funding needed to address the current estimated \$11B backlog in required work), and (2) sites compete against other sites and are prioritized primarily based on the extent to which they pose the highest and most imminent risk to human health, safety, and the environment.
- **ADEC Brownfield Assessment & Cleanup Grants:** OC can access these grants to continue assessment and cleanup work at sites assessed initially using the CWAGST Grant.

Funding Resources for Housing Development:

- **Low Income Housing Tax Credit Program (LIHTC):** The *2020 Housing Plan* included a recommendation for the City and OC to work with the Aleutian Housing Authority to submit a LIHTC application to the Alaska Housing Finance Corporation for funding to finance 20 to 25 units of affordable rental housing. This application can be completed once land is cleaned up and made available for redevelopment.
- **Private Investment:** A large source of funding will be private investment. As described above, OC has significant experience working with partners to attract funding needed to finance large-scale development projects. OC is confident its existing relationships with investors can be leveraged to secure funding needed to move development forward once contamination is addressed. ***OC is repeatedly approached by developers looking for shovel-ready land in Unalaska, but lingering contamination concerns repeatedly prevents deals from moving forward. Assessment and cleanup planning activities will allow OC to better market sites for redevelopment and remove current barriers to raising capital for essential projects. It has been over 80 years since WWII and 52 years since lands were conveyed to OC and only a small percentage has been cleaned up by the US government for full use by OC. It is difficult to attract investment and plan for redevelopment without timelines.***

Funding Resources for Infrastructure:

- **Industrial Revenue Bonds (IRBs):** The City's Comprehensive Plan identifies IRBs as a funding mechanism available to fund construction of infrastructure needed for housing or other development projects.
- **Local Improvement Districts (LIDs):** LIDs are another infrastructure funding mechanism that has been used in Unalaska by the City to fund upfront costs for utility extensions and other infrastructure improvements.
- **US Dept. of Transportation (DOT) BUILD Grants:** The Q-Tribe was successful in securing a \$22.3M grant for a barge expansion project on land owned by OC. The planned cruise ship dock in the **Bunker Hill/LSA TA** is another infrastructure project for which BUILD funding could be available and secured by the Q-Tribe on behalf of OC.
- **Denali Commission:** The Rural Transportation Match and Gap Funding Assistance Program provides funding for improved road access for rural communities.

Funding Resources for Makushin Volcano Geothermal Project: Seven sources of funding have been identified for completion of this project including equity investments by the project partners, debt financing, selling of additional equity shares, issuance of energy related bonds, grants, and monetization of available investment tax credits. \$2.75M has been secured by Q-Tribe for planning study and permitting activities. The City, Q-Tribe and OC are coordinating efforts for pursuing additional funding.

**1.g. Use of Existing Infrastructure:** The three TAs are all within the ~5% of OC lands located within or immediately adjacent to the urbanized areas of the City of Unalaska and the areas served by existing road, water, sewer, and other utilities. These areas were selected in part because development projects will be able to leverage the existing infrastructure. Some additional infrastructure (internal access roads and utility connections for individual new buildings) will be required to advance development of all three TAs. To effectively plan for addressing the specific infrastructure needs in each area, it is proposed to complete "area-wide" infrastructure studies for each of the TA's as part of reuse planning activities. OC will work with the City and Q-Tribe to pursue funding needed to construct any required infrastructure improvements. Four funding sources available for infrastructure are listed in Section 1.f.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT:**

**2.a. The Community's Need for Funding:** Funding will meet community needs and benefit the Q-Tribe – **a federally recognized tribe with 1,200 members.** The desired projects will benefit residents throughout the City of Unalaska which is a small community with **<6,000 permanent residents.** In addition to having a small population, **Unalaska is one of the most physically isolated communities in the US** which results in a host of additional challenges in addressing brownfield sites and advancing their redevelopment and reuse. Since 2020, the City has been impacted by a series of economic setbacks that have further impacted the community's collective resources for addressing brownfields. These include the closure of red king crab season for two years in a row (the first season closure in over

25 years), which the City estimates has resulted in a \$1.2 million annual reduction in general fund revenues. The COVID-19 pandemic also hit Unalaska’s tourism economy especially hard. Due to COVID-19 travel restrictions, not a single cruise ship docked in Unalaska from 2020 through 2021, and six of 12 scheduled ships cancelled in 2022, costing jobs and revenue for local businesses that rely on cruise ship tourists. While the pandemic is over, the economy is slower to rebound in isolated communities such as Unalaska. This Grant will be used to assess and plan for cleanup of sites (in the **Pyramid Valley** and **X Lagoon** TAs) that will help address the area’s extreme housing shortage, help strengthen the tourism industry by supporting plans for development of a new cruise ship terminal and related commercial uses in the **Bunker Hill/LSA TA**, as well as help advance the Makushin Geothermal Project.

**2.b. Health or Welfare of Sensitive Populations:** Unalaska’s fishing industry attracts workers from around the world, resulting in a highly diverse population. Most of the City’s population is Asian, Hispanic, or American Indian/Alaskan Native with a total minority population of 78% according to the latest census data.<sup>e</sup> Geospatial mapping tools were used to assess socioeconomic indicators for the City relative to the State (**Table 1**). The City ranks in the 77th percentile in the State for the overall Demographic Index and also has high relative percentages of residents who are “people of color,” linguistically isolated, and adults lacking a high school education. Although the City only ranks in the 47th percentile for its low-income population, this measure does not account for the extraordinarily high cost of living in the City, which impacts the affordability of necessities from housing to food to healthcare. A study by the Council for Community and Economic Research found that **Unalaska has the 7th highest cost of living among 267 communities surveyed**, trailing only Manhattan, Nantucket, San Francisco, Honolulu, Brooklyn, & Washington DC.<sup>f</sup>

The health challenges for residents in Unalaska are detailed in Section 2.c. A key welfare concern is the lack of affordable housing and the widespread prevalence of substandard housing. A housing conditions survey completed by the City identified 40% of the City’s existing housing stock as either dilapidated or in need of major or substantial repairs. Due to the severe housing shortage, many residents are still

Table 1: Socioeconomic Indicators	Percentile in AK
Demographic Index	77%
People of Color Index	88%
Low Income Population	47%
Linguistically Isolated	84%
Less than High School Education	80%

*Red font = >75th Percentile.*

living in 16- by 20-foot “cabanas” built during WWII as temporary military housing. These cabanas are the source of health concerns as they were not intended for long-term use and building materials have degraded over time. It is reported the cabanas contain ACM, lead-based paint (LBP), and mold. However, even these subpar homes that are linked to health concerns are in high demand due to the severe housing shortage. Additionally, the lack of available and affordable housing has resulted in the large seafood processing plants functioning as “industrial company towns” in which workers live in crowded bunk-style or dormitory style housing located on the industrial complexes.

The reuse plans for the **Pyramid Valley** and **X Lagoon** TAs are focused on development of healthy housing (ACM-free and LBP-free), which will help to address welfare problems linked to the lack of affordable housing as well as health concerns linked to the City’s aging housing stock (specifically, the WWII cabanas residents are still living in).

**2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions:** As a small, isolated community with a large transient population, health data are not readily available. Unalaska ranks in the 87th state percentile for LBP exposure (see **Table 3**). With its aging building stock, there is also a high likelihood of exposure to ACM and LBP. This is especially concerning as residents spend more time indoors than residents in other areas of the country due to the long winters and harsh weather. Additionally, 9.9% of Alaskans suffer from asthma, which can be exacerbated by poor air quality and ACM exposure.

Health data specifically for Q-Tribe members are not available. However, cancer data for Alaskan Natives as a whole are available in a recent study by the Alaska Native Tribal Health Consortium Epidemiology Center.<sup>g</sup> Overall, Alaska is the only state where cancer supersedes heart disease as the leading cause of death. For decades cancer has been the leading cause of death for Alaskan Natives, accounting for over 20% of deaths. The rate of lung and bronchus cancers is 37% higher for Alaska Natives. For birth defects, the prevalence rate among Alaska Native children was 651 per 10K live births – a rate nearly two and a half times higher than among non-native children (266/10K).<sup>h</sup> Multiple studies have documented a high incidence of Parkinson’s Disease (PD) among Alaskan Natives.<sup>i</sup> PD has been linked to exposure to toxins such as heavy metals and solvents and there is local anecdotal evidence of high rates of PD among Alaskan Natives in Unalaska, and fears that it may be attributable to exposure to toxins from the former military sites such as those that existed in all three TAs.

<sup>e</sup> Source: 2019-2023 American Community Survey, 5-yr data (obtained from www.factfinder.census.gov).

<sup>f</sup> Sobel, Z. (2019, January 7). Expensive Groceries and Health Care Contribute to Unalaska’s High Cost of Living. *KUCB Channel 8 TV*. [Link](#).

<sup>g</sup> Alaska Native Tribal Health Consortium, Epidemiology Center. *Cancer in Alaska Native People, 1969-2018, the 50-Year Report (2021)*.

<sup>h</sup> AK Division of Public Health, *AK Birth Defects Registry Table C-58*.

<sup>i</sup> *Parkinson’s disease among American Indians and Alaska natives: A nationwide prevalence study*.

A major health problem in Unalaska that exacerbates asthma, lead-poisoning, cancer and other diseases or health conditions, is the low rates of preventative health measures for residents. The Center for Disease Control and Prevention (CDC) Places: Local Data for Better Health Website<sup>j</sup> provides age-adjusted estimates of prevalence rates in 2019 for ten health prevention measures for the Aleutians West CT and the US. The Aleutians West CT (~84% of which are residents in Unalaska) has significantly lower rates for every health prevention measure as summarized in **Table 2** (except for lack of health insurance for which the higher rate represents the worse condition).

<b>TABLE 2 Preventative Health Measure</b>	<b>Prevalence Rate in Aleutians West CT</b>	<b>Ave. Prevalence Rate in US</b>	<b>TABLE 2 Preventative Health Measure</b>	<b>Prevalence Rate in Aleutians West CT</b>	<b>Ave. Prevalence Rate in US</b>
Current Lack of Health Insurance <sup>A</sup>	19.1	14.1	Mammography Use <sup>D</sup>	66.2	77.8
Visit to Doctor for Routine Checkup <sup>B</sup>	66.8	75.0	Cervical Cancer Screening <sup>E</sup>	74.9	85.5
Visit to Dentist during 2018 <sup>B</sup>	62.1	66.2	Colon Cancer Screening <sup>A</sup>	52.5	65.0
Taking Medicine to Control High Blood Pressure (HBP) <sup>C</sup>	63.2	76.2	Older Adult Men – Current on Core Prevention Measures <sup>F</sup>	18.9	32.7
Cholesterol Screening <sup>B</sup>	80.0	86.0	Older Adult Women – Current on Core Prevention Measures <sup>F</sup>	20.5	28.1

**Notes:** A = adults 18-64 years (yrs; 2019), B = Adults ≥18 yrs, C = Adults w/HBP ≥18 yrs, D = Women aged 50-74 yrs, E = Women aged 21-65 years; F = ≥65 yrs

Development of new LBP- and ACM-free housing combined with the replacement of diesel fuel generators with geothermal energy as the primary source of power will result in healthier homes that will help reduce asthma rates. Addressing the City’s housing shortage will also help attract essential workers such as doctors to Unalaska. More medical professionals will help increase access to preventative health services and facilitate earlier diagnosis and treatment of conditions such as PD that have been linked to exposure to hazardous substances and pollutants.

**2.d. Economically Impoverished/Disproportionately Impacted Populations:** Geospatial mapping tools were used to evaluate the TA for environmental exposure impacts (presented in **Table 3**). The percentiles for which data were provided ranged from the 63rd to the 87th percentile relative to other areas in Alaska, indicating a disproportionate pollution burden for residents in the TA. The intensive historical military and industrial uses have resulted in cumulative environmental impacts that are greater than other areas of AK and the US. Although data for the hazardous waste proximity index is not available, the TAs would likely rank very high in this category given the presence of former military installations in the X Lagoon, Pyramid Valley, and Bunker Hill/LSA areas.

<b>Environmental Impact Indices</b>	<b>Percentile in AK</b>
Lead Paint Indicator	<b>87%</b>
Risk Mgmt. Program (RMP) Facility Proximity	<b>78%</b>
Hazardous Waste Proximity	<i>Not Available</i>
Superfund Proximity	<i>Not Available</i>
Underground Storage Tank Proximity	63%

<b>Category</b>	<b>Disadvantaged Indices</b>	<b>Percentile in US</b>
Demographics	Minority Population	<b>77%</b>
Housing	Lack of Indoor Plumbing	<b>96%</b>
Legacy Pollution	FUDS	<b>Yes</b>
Legacy Pollution	Proximity to RMP Facilities	<b>92%</b>
Workforce Development	Linguistic Isolation	<b>80%</b>

**Red font** = Distress Indicators >75th Percentile.

It should be noted these geospatial mapping tools fail to highlight the full scope and scale of harm to which the Unangan people have been subjected. The consequences of military policies reached a pinnacle during WWII when native residents were forced from their homes and placed in internment camps for three years while their land was seized by the US military and their villages burned and bulldozed and replaced with US Army and Navy facilities. Ten percent of the villagers died in internment. When some of the lands were eventually returned with the passage of ANCSA, many were grossly contaminated. Although the US government eventually acknowledged its responsibility to address the contamination caused by the military through the creation in 1986 of the Defense Environmental Restoration Program (DERP) and the FUDS program, after nearly 40 years of assessment and cleanup, only 49 of the 109 contaminated sites in Unalaska tracked by ADEC have been closed, and few if any of these are believed to be fully ready for reuse or redevelopment.<sup>k</sup> The lack of progress in assessing FUDS continues to negatively impact the OC, Q-Tribe, and Unalaska community as a whole. It contributes to ongoing challenges in building housing, and developing OC’s land for uses that could enhance quality of life and create economic opportunities.

This EPA Grant will be used to assess and plan for cleanup of priority sites selected by the community as redevelopment priorities. Cleanup of TAs will not displace any residents or businesses and will significantly benefit a disproportionately impacted population. Specifically, the community suffers from lack of healthy housing, has significant exposure to ACM and LBP (see **Table 3**), and falls in the 96<sup>th</sup> percentile in the US for lack of indoor plumbing (see **Table 4**). Prioritizing projects that support new affordable, healthy housing and reduce carbon emissions by replacing diesel-generated power with geothermal energy will improve indoor and outdoor air quality, which will contribute to reducing high rates of asthma and lung and bronchus cancers. Additionally, cleanup of heavily contaminated former military installations will help reduce exposure to heavy metals and other contaminants that are believed to be contributing to elevated rates of PD in Alaskan Natives in Unalaska.

<sup>j</sup> CDCP PLACES: Local Data for Better Health. Health Rankings for City of Unalaska, Alaska. [Link](#).

<sup>k</sup> Division of Spill Prevention and Response (alaska.gov). Accessed 01/14/26.

**2.e. Project Involvement / 2.f. Project Roles:** The partners below play significant roles in implementing our environmental restoration projects and helping the community achieve desired reuse goals. As described in Section 1.c, OC, the City and Q-Tribe executed a Trilateral Agreement to foster improved coordination of efforts related to public health, environmental management, economic development, and infrastructure. This collaboration includes monthly brownfields-focused trilateral meetings to coordinate project efforts between the City's Brownfield CWA Grant, OC's Brownfield CWAGST, and Q-Tribe's Section 128(a) Tribal Response Program (TRP). These monthly meetings include discussions about site prioritization and community priorities. Together the group makes collective decisions on which sites each agency will fund and manage under their respective brownfields program. Additionally, USACE hosts quarterly Restoration Advisory Board (RAB) meetings in Unalaska with OC, the City, and Q-Tribe. These meetings include many of the stakeholders below as well as participation from dozens of residents. The RAB also serves as the Brownfields Advisory Committee (BAC) for the programs managed by OC, the City, and Q-Tribe. This approach maximizes community engagement and provides an opportunity for key stakeholders and the general public to directly inform projects. Coordination with the RAB also ensures work under the brownfield programs managed by OC, the City, and Q-Tribe do not overlap with work underway by USACE (so assessment and cleanup activities are not duplicated). OC will continue to use the trilateral and RAB meetings to coordinate work under this grant and provide our partners with meaningful involvement in the decision making process.

- **Q-Tribe** ( ): The Q-Tribe will continue to be an essential partner. Their involvement includes representing the interests of Tribal members and supporting outreach. They will continue to provide support in pursuing funding to advance priority projects.
- **City of Unalaska** ( ): The City has committed to providing assistance from their geographic information system (GIS) staff and supporting reuse planning. The City will continue to be a key partner in securing funding and supporting critical projects such as housing and the Makushin Volcano Geothermal Project.
- **USACE Restoration Advisory Board (RAB)** ( ): Participation by USACE and all agencies identified in this section occurs through the RAB – a branch of the USACE that focuses on supporting local environmental restoration efforts, including, but not limited to cleanup of FUDS. They are an essential partner, because all three TAs are FUDS. To better coordinate cleanup activities performed using the EPA Grant with on-going work through the FUDS Program, OC will continue to use the allocated time of the RAB meetings to provide project updates and facilitate project involvement from key stakeholders and the public.
- **US Dept. of Energy (DOE), Arctic Energy Office** ( ): The DOE's Arctic Energy Office has been involved in examining Unalaska's unique energy challenges and visiting the community to assess the viability of the Makushin Volcano Geothermal Project. They will continue to be consulted throughout the planning process of the geothermal project as well as consulted for guidance with funding opportunities to support diversifying local energy sources.
- **Museum of the Aleutians (MOTA)** ( ): The MOTA participates on the RAB and helps with site prioritization and community outreach. Staff from MOTA have some of the greatest local knowledge and expertise related to historic and archaeological sites. They are a key partner in planning work in compliance with the National Historic Preservation Act (NHPA) and in responding to inadvertent discoveries of human remains, funerary objects, sacred objects, or objects of cultural patrimony that may be encountered.
- **Iliuliuk Family and Health Services (IFHS)** ( ): The IFHS is the primary health service provider in Unalaska. They will continue serving on the RAB and will provide input on cleanup and reuse decisions as they relate to public health.
- **Aleutian Pribilof Islands Association (APIA) Oonalaska Wellness Center** ( ): The APIA is a non-profit focused on advancing the economic, health, social, and cultural development of residents throughout the Aleutian Islands. Their programs include the operation of health clinics, alcohol counseling centers, public safety, environmental, elderly, nutrition, education, social and welfare services, and child protection. They will continue serving on the RAB and providing input on cleanup and reuse planning.
- **Aleutian Housing Authority (AHA)** ( ): The AHA is the primary provider of affordable housing services in the Aleutian/Pribilof Islands. Their programs include the development of community infrastructure, regional economic development, and creation of employment and job training opportunities for at-risk populations. They are expected to be a key partner for informing affordable housing developments.
- **Alaskan Native Tribal Health Consortium (ANTHC)** ( ): ANTHC is an intertribal health non-profit that assists Tribal members with health-related needs. They will be consulted to assist with connecting resources to community members and addressing health concerns related to contaminated sites.

- **ADEC** ( [REDACTED] ): As the state environmental regulatory agency, OC works closely with ADEC on all our assessment and cleanup projects. We will continue this partnership and request input on all environmental deliverables (work plans and final reports).

**2.g. Incorporating Community Input:** OC relies on collaboration to further its mission and understands community engagement is imperative to the success of its project. OC will continue working with its partners to solicit project input. Elements of our community engagement plan include the following:

- **Project Webpage:** OC created a brownfields webpage for the FY23 CWAGST Grant. This webpage will be updated with information regarding activities proposed for the FY26 Grant. The website will include information about how to provide feedback (such as informing site prioritization) and project updates.
- **Community Meetings:** As discussed in Section 2.e/2.f, OC hosts monthly brownfield-focused trilateral meetings with the City and Q-Tribe to coordinate project efforts under each agency’s respective programs. This coordination leverages the use of grant funds by assigning individual sites/activities for each agency to fund and avoids overlapping efforts. Additionally, OC, the City, and Q-Tribe participate in the quarterly RAB meetings (described in Section 2.e/2.f) hosted in Unalaska. The RAB meetings are open to the public and hosted in person (the preferred format for our community) and virtually. RAB meetings are attended by dozens of community members, typically last up to three hours and include collective discussions and updates from USACE, OC, the City, and Q-Tribe about our respective environmental restoration efforts. RAB meetings are used to solicit input from the community on site prioritization/cleanup/reuse planning. OC will continue using the trilateral and RAB meetings to engage the community throughout this project.
- **Social Media:** OC and its partners have established followings on their Facebook pages that will be utilized to ensure that residents, shareholders, and tribal members stay informed and are included in decision-making.
- **Emails & Newsletters:** Both OC and the Q-Tribe publish quarterly newsletters (*The Eider Pointer* and the *Unangan Tide*) to shareholders and Tribal members. These newsletters feature updates on environmental programs and will be used to solicit input throughout the project. OC added a column to the newsletter for updates related to EPA Grant projects.
- **Virtual & In-Person Meetings:** OC hosts in person meetings (the community’s preferred format) but continues to provide opportunities for remote participation in all meetings to ensure effective engagement for those who cannot attend in person. All community meetings are advertised with information on how to attend virtually.

Implementing these engagement methods will allow stakeholders to provide meaningful project input. Additionally, OC has access to translation resources/interpreters that are available for meetings when requested.

**3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS:**

**3.a. Project Implementation / 3.b. Anticipated Project Schedule / 3.c. Task/Activity Lead / 3.d. Outputs:** The scope of work has been organized into the tasks below. We expect the project will be completed within three years.

<p><b>Task 1: Project Management, Reporting &amp; Other Eligible Activities</b></p> <p><b>a. Project Implementation:</b> Task 1 will include: 1) general Cooperative Agreement (CA) compliance oversight; 2) quarterly progress reporting; 3) annual Federal Financial Report (FFR); 4) Property Profile Form submission and updates in EPA’s Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; 5) a final performance report summarizing accomplishments, expenditures, outcomes, outputs, lessons learned and resources leveraged; 6) biweekly check-in meetings with the consultant to ensure the project is progressing as planned; 7) monthly check-in meetings with EPA and ADEC; and 8) participation in national and regional brownfield conferences.</p> <p><b>b. Project Schedule:</b> Activities will be ongoing throughout the project period (which we anticipate will be 3 years).</p> <p><b>c. Task Lead:</b> OC with support from the Qualified Environmental Professional (QEP) Contractor.</p> <p><b>d: Output(s):</b> 12 Quarterly Reports; 3 FFRs; prompt ACRES reporting; 1 Final Performance Report and associated financial documents; 2 brownfield conferences attended by 2 OC staff; 72 check-in meetings with QEP Contractor (24 meetings/year x 3 years); 36 check-in meetings with EPA and ADEC (12 meetings/year x 3 years).</p>
<p><b>Task 2: Community Engagement &amp; Site Prioritization</b></p> <p><b>a. Project Implementation:</b> A detailed description of the planned methods for involving the public is provided in Section 2.g. This task includes: 1) updating the existing brownfield project webpage; 2) monthly trilateral meetings and quarterly RAB meetings; 3) hosting additional public meetings and/or including project updates as part of existing community events OC participates in; 4) updating project fact sheets and preparing press releases; 5) posting updates to OC’s Facebook page; and 6) providing project updates in OC’s shareholder newsletter.</p> <p><b>b. Project Schedule:</b> The project webpage will be updated during the first quarter (1Q). Project information will be shared in OC’s newsletter by 2Q. Trilateral meetings will continue monthly and RAB meetings will continue quarterly. Project updates will be shared at these meetings.</p>

<p><b>c. Task Lead:</b> OC with support from the QEP Contractor.</p> <p><b>d: Output(s):</b> 12 brownfield-focused trilateral meetings/year, 4 RAB meetings/year, 1 public meeting (or community event)/year and meeting materials. Project posters/fact sheets posted to OC's Facebook page.</p>
<p><b>Task 3: Assessment &amp; Cleanup Planning Activities</b></p> <p><b>a. Project Implementation:</b> This task includes completion of 10 Phase I and 12 Phase II ESAs at the priority sites identified in Section 1.b, and at other sites prioritized by the community. Phase I ESAs will comply with the All Appropriate Inquiries (AAI) Final Rule and the ASTM E1527-21 standard. Sites prioritized for assessment may contain buildings that will be renovated or demolished. Therefore, budget is included for completion of up to 6 Regulated Building Materials (RBM) surveys for buildings at priority sites. This task also includes: 1) preparation of eligibility determination (ED) forms for each site; 2) Section 106 and 7 consultations (including anticipated periodic archaeological monitoring and biological monitoring [during bird nesting seasons]); 3) updating the existing Master Quality Assurance Project Plan (QAPP) and Area-Wide RBM Survey Work Plan to be approved by EPA prior to performing any Phase II ESAs or RBM surveys; 4) preparation of sampling and analysis plans (SAPs) and Health and Safety Plans (HASPs) for Phase II ESAs and RBM surveys; 5) UXO screening in areas that have not been previously cleared; and 6) developing cleanup plans for 3 areas/sites.</p> <p><b>b. Project Schedule:</b> <u>Year 1:</u> Master QAPP &amp; Area-Wide RBM Survey SAP, 5 Phase I ESAs, 2 Phase II ESAs, 2 RBM Surveys   <u>Year 2:</u> 5 Phase I ESAs, 6 Phase II ESAs, 4 RBM Surveys, 1 Cleanup Plan; <u>Year 3:</u> 4 Phase II ESAs, 2 Cleanup Plans</p> <p><b>c. Task Lead:</b> QEP Contractor under the direction of OC.</p> <p><b>d: Output(s):</b> Updated Master QAPP &amp; Area-Wide RBM Survey SAP, Site-Specific SAPs &amp; HASPs, Section 7 &amp; 106 Consultations, Phase &amp; II ESA Reports, Archaeological &amp; Biological Monitoring Reports, UXO Survey Reports, Cleanup Plans</p>
<p><b>Task 4: Reuse Planning</b></p> <p><b>a. Project Implementation:</b> Infrastructure studies will be key to advancing redevelopment of the X Lagoon, Pyramid Valley, and Bunker Hill/LSA TAs as a whole. Therefore, budget is included for completion of area-wide infrastructure evaluations for each TA. Priority sites listed in Section 1.b may benefit from completion of site-specific reuse plans after environmental issues are quantified. We anticipate completion of two site-specific reuse plans (likely to support housing development in the Pyramid Valley and X Lagoon TAs).</p> <p><b>b. Project Schedule:</b> <u>Year 2:</u> 1 Site Reuse Plan. 3 Area-wide Infrastructure Evaluations. <u>Year 3:</u> 1 Site Reuse Plan.</p> <p><b>c. Task Lead:</b> Contractor under the direction of OC.</p> <p><b>d: Output(s):</b> 2 Site Reuse Plans; 3 Area-Wide Infrastructure Evaluation (one for each TA)</p> <p><b>3.e. Cost Estimates:</b> The estimates below use an average rate of \$100/hour for OC personnel (\$65 personnel salary + \$35 fringe benefits) and \$200/hour for QEP services. <b><i>The majority of OC's personnel time will be provided as in-kind contributions.</i></b> OC is requesting 5% of the grant for indirect costs (\$100K). Approximately <b><i>81% of grant funds (\$1.627M of contractual services) are allocated for Task 3 (Assessment &amp; Cleanup Planning Activities).</i></b> As described above, <b><i>we anticipate the project will be completed in three years.</i></b></p>
<p><b>Task 1: Project Mgmt., Reporting &amp; Other Activities   Total Budget = \$113,500 (\$88,500 Direct + \$25,000 Indirect)</b></p> <p><b>Personnel &amp; Fringe Total = \$32,000</b></p> <ul style="list-style-type: none"> <li>• Biweekly Project Meetings*: \$14,400 (24 meetings/yr x 1 hour/meeting x 3 years x 2 staff x \$100/hr)</li> <li>• Brownfield Conferences/Trainings: \$12,800 (2 events x 8 hour/day x 4 days x 2 OC staff x \$100/hr)</li> <li>• Compliance Reporting &amp; CA Mgmt. (Quarterly, Annual &amp; Final Reports, &amp; ACRES updates): \$4,800 (48 hours x \$100/hr)</li> </ul> <p><b>Travel Total for Brownfield Conferences = \$10,500</b></p> <ul style="list-style-type: none"> <li>• 1 National Conference: \$10,000 (\$5,000/person for airfare, lodging, meals, transportation &amp; incidentals x 2 OC staff)</li> <li>• 1 State Conference: \$500 (\$250/person for mileage, parking, meals &amp; incidentals x 2 OC staff) (Note: State conferences are hosted in Anchorage where OC's leadership is based so airfare and lodging will not be required.)</li> </ul> <p><b>Other Total = \$1,200</b> (Conference Registration Fees [\$300/person x 2 OC staff x 2 events])</p> <p><b>Contractual Total = \$44,800</b></p> <ul style="list-style-type: none"> <li>• Compliance Reporting (Quarterly, Annual &amp; Final Reports, &amp; ACRES updates): \$16,000 (80 hours x \$200/hr)</li> <li>• Biweekly Project Meetings*: \$28,800 (24 meetings/yr x 1 hour/meeting x 3 years x 2 staff x \$200/hr)</li> </ul> <p><i>*One of the biweekly check-in meetings per month will include EPA and ADEC staff.</i></p>
<p><b>Task 2: Community Engagement   Total Budget = \$65,400 (\$40,400 Direct + \$25,000 Indirect)</b></p> <p><b>Personnel &amp; Fringe Total = \$14,000</b></p> <ul style="list-style-type: none"> <li>• Trilateral Meetings: \$7,200 (12 meetings/year x 1 hr/meeting x 3 years x 2 staff x \$100/hr)</li> <li>• Other Meetings (RAB and/or Public Meetings): \$4,000 (40 hours x \$100/hr)</li> <li>• Update &amp; Maintain Project Webpage: \$2,800 (28 hours x \$100/hr)</li> </ul> <p><b>Contractual Total = \$26,400</b></p> <ul style="list-style-type: none"> <li>• Trilateral Meetings: \$14,400 (12 meetings/year x 1 hr/meeting x 3 years x 2 staff x \$200/hr)</li> <li>• Other Stakeholder Meetings (RAB and/or Public Meetings): \$8,000 (40 hours x \$200/hr)</li> <li>• Assist with Updates to Project Webpage Content &amp; Fact Sheets: \$4,000 (20 hours x \$200/hr)</li> </ul>

<b>Task 3: Site Assessment &amp; Cleanup Planning   Total Budget = \$1,659,100 (\$1,634,100 Direct + \$25,000 Indirect)</b>
<b>Personnel &amp; Fringe Total = \$2,000</b> (Review & inform deliverables: 20 hours)
<b>Contractual Total = \$1,627,100</b>
<ul style="list-style-type: none"> <li>Eligibility Requests: \$6,000 (30 hours x \$200/hr)</li> <li>Update Master QAPP &amp; RBM Survey SAP: \$4,100 lump sum</li> <li>Section 106 &amp; 7 Compliance: \$42,000 (210 hrs x \$200/hr)*</li> <li>UXO Screening: \$40,000 (200 hours x \$200/hr)*</li> <li>Phase I ESAs: \$65,000 (\$6,500/site x 10 sites)</li> <li>Phase II ESAs: \$1,260,000 (\$105,000/site x 12 sites)**</li> <li>RBM Surveys: \$60,000 (\$10,000/site x 6 sites)</li> <li>Cleanup Plans: \$150,000 (\$50,000/area x 3 areas)</li> </ul>
<i>*Part-time monitoring for archaeological and biological resources as well as UXO screening in select areas is anticipated based on project experience.</i>
<i>**Cost includes developing SAPs and HASPs.</i>
<b>Other Total = \$5,000 (ADEC Fees)</b>
<b>Task 4: Reuse Planning   Total Budget = \$162,000 (\$137,000 Direct + \$25,000 Indirect)</b>
<b>Personnel &amp; Fringe Total = \$2,000</b> (Review & inform deliverables: 20 hours)
<b>Contractual Total = \$135,000</b>
<ul style="list-style-type: none"> <li>Area-Wide Infrastructure Evaluation (X Lagoon TA): \$15,000/area</li> <li>Area-Wide Infrastructure Evaluation (Pyramid Valley &amp; Bunker Hill/ LSA TAs): \$80,000 (\$40,000/area)</li> <li>Site-Specific Reuse Plan: \$40,000 (\$20,000/site x 2 sites)</li> </ul>

A summary of the proposed budget for grant-funded activities is provided in the table below (excluding equipment and supplies since budget is not requested under those categories).

Budget Category	Task 1: Project Mgmt., Reporting & Other Activities	Task 2: Community Engagement	Task 3: Site Assessment & Cleanup Planning	Task 4: Reuse Planning	Total
Personnel	\$20,800	\$9,100	\$1,300	\$1,300	\$32,500
Fringe Benefits	\$11,200	\$4,900	\$700	\$700	\$17,500
Travel	\$10,500	\$0	\$0	\$0	\$10,500
Contractual	\$44,800	\$26,400	\$1,627,100	\$135,000	\$1,833,300
Other	\$1,200	\$0	\$5,000	\$0	\$6,200
Total Direct Costs	\$88,500	\$40,400	\$1,634,100	\$137,000	\$1,900,000
Total Indirect Costs	\$25,000	\$25,000	\$25,000	\$25,000	\$100,000
<b>TOTAL BUDGET</b>	<b>\$113,500</b>	<b>\$65,400</b>	<b>\$1,659,100</b>	<b>\$162,000</b>	<b>\$2,000,000</b>

**3.f. Plan to Measure and Evaluate Environmental Progress and Results:** OC’s Project Coordinator will be responsible for tracking, measuring, and evaluating progress through measurable outcomes and outputs. A spreadsheet of expected outputs and outcomes will be maintained and updated quarterly for reporting to EPA. Anticipated **outputs** include: number of sites nominated and prioritized for funding; number of trilateral and community meetings hosted; Phase I/II ESAs completed; RBM Surveys completed; cleanup plans completed; sites remediated; sites receiving No Further Action determinations from ADEC; infrastructure evaluations completed; and reuse plans completed. Progress reports, financial reports, and closeout reports will also be outputs. Anticipated **outcomes** include number of attendees at trilateral and community meetings/events; number of FUDS assessed; number of sites and acres assessed, remediated, and redeveloped; number of jobs created; number of housing units created; and dollars leveraged per site. Qualitative measures of long-term community education and overall improvement of quality of life will be monitored through surveys. Progress will be measured against meeting anticipated deadlines and community satisfaction. By using the detailed tracking mechanisms described above, OC will be able to confirm the project is progressing as planned and monitor key performance indicators.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE:**

**4.a. Organizational Capacity / 4.b. Organizational Structure / 4.c. Description of Key Staff:** As demonstrated with the FY23 CWAGST Grant, OC is well qualified to lead a successful EPA Brownfield Grant project, having developed the organizational capacity and grant management experience during implementation of EPA and other state and federal grants, as well as relying on our nearly 50-years of organizational experience in managing, developing, and coordinating the cleanup and reuse of OC’s lands. OC’s management team will lead all grant activities with support from other OC staff, project partners and the QEP. The QEP team will be responsible for implementation of technical activities and compliance reporting to EPA under the direction of OC. A primary goal throughout the project will be to effectively integrate work under this grant, with our partners, in particular, the City, USACE, and Q-Tribe who are performing related work under the FUDS, NALEMP, and Section 128(a) Tribal Response Programs. Key OC staff and their roles are described below:

- Project Director – Natalie Cale, Chief Executive Officer (CEO)/General Counsel:** Natalie has worked on legal issues relating to OC’s contaminated lands since 2001. She has experience managing major federal grants, including the CARES Act Relief Program, a \$37M award to the Alaska Federation of Natives, and a \$22.3M RAISE Grant for a dock expansion project. Natalie also serves on the ANVCA Legislative Committee overseeing the

Contaminated Lands section. As Project Director for all OC's Grants, Natalie oversees contractors, communicates progress with the EPA and stakeholders, serves as the liaison between OC and the Board of Directors, and ensures that the work plan is executed appropriately.

- **Project Coordinator – Donna Van Flein, Corporate Affairs Coordinator/Grant Manager:** Donna is currently working as the Project Coordinator on various Federal 8(a) contracts and EPA Grants to help facilitate deliverables and meet contract schedule deadlines. She has a background in grant writing and administrating a variety of contracts. Donna helps facilitate community and shareholder outreach through coordination of the quarterly OC newsletter and public meetings. As Project Coordinator, Donna oversees day-to-day project activities, communicates project updates to OC's shareholders and the community at large, prepares progress reports, and tracks project schedules and budgets.
- **Financial Manager – Eric DeCook, Controller:** Eric manages all financial compliance aspects of OC's grants, including budget tracking, documentation, reporting, and drawdowns. Eric will review all quarterly budget summaries for accuracy and consistency.

**4.d. Acquiring Additional Resources:** OC routinely contracts for engineering and consulting services and has expertise complying with federal procurement requirements. OC does not intend to award any subgrants but does plan to retain a QEP team to support programmatic management and all technical aspects of the project. The logistics of fieldwork in Unalaska are much different than elsewhere due to the challenging terrain and weather conditions as well as challenges with mobilizing staff and equipment to the island. Therefore, it is critical we use contractors with a history of successful performance in the Aleutian Islands. OC notifies contractors of RFP/Qs via direct email, announcements at community meetings held in support of other projects and submits RFQ/Ps to ANTHC (the technical assistance provider for ANCs) to publish and distribute to their list of registered consultants. OC's systems include development of RFQ/Ps in-house with review by legal staff prior to issuance. A selection committee reviews proposals and may conduct interviews depending on the quality and number of proposals received. Proposals are scored, ranked, and contractors selected based on the scoring/selection criteria specified in the RFQ/P. Contracts are then executed with the selected firm subject to further legal review. OC will secure a QEP upon notice of grant award. OC will abide by EPA procurement requirements (2 CFR § 200.317-326 and *Best Practice Guide for Procuring Services, Supplies & Equipment*).

**4.e. Currently Has or Previously Received an EPA Brownfields Grant:** OC has received two EPA Brownfield Grants since 2023. Information for these grants is provided below.

**(1) Accomplishments:**

**(1.) FY23 EPA Brownfield CWAGST (\$2M):** The CWAGST project started on 10/01/2023 and is on track to be completed two years ahead of schedule. Key accomplishments include:

- Developed Master QAPP, Master RBM Survey Work Plan, and Remote Sensing Work Plan.
- 6 eligibility requests approved (for 37 parcels covering 1,266 acres).
- 3 Phase I ESAs (covering 12 parcels).
- 3 Phase II ESA Work Plans (covering 24 parcels).
- Phase II ESAs for 11 sites.
- LiDAR, Multispectral & Aerial Imagery Surveys for 4 areas comprised of 23 parcels.
- Geophysical Surveys for 3 areas (covering 14 parcels).
- 2 Cleanup Plans.
- 2 NEPA Categorical Exemption Documents prepared in support of cleanup projects at Strawberry Hill & CMA Dock.
- Created/updated 32 property profiles in ACRES.
- Leveraged over \$3M of public funds.
- In-kind contributions of OC personnel labor & fringe.
- Ongoing public engagement via Trilateral and RAB Meetings.
- Attended 1 national & 1 state brownfields conference.
- Completed 8 Quarterly Performance Reports.
- Final Performance Report to be completed Summer 2026.

**(2.) FY24 EPA Brownfield Cleanup Grant (\$2M):** A remedial action investigation was completed to confirm the limits of the landfill and confirm the locations of asbestos waste (which differed from the locations documented in USACE reports). Extensive coordination with ADEC for the Remedial Action Work Plan (RAWP) has been completed and the RAWP is under review by EPA and ADEC. Remedial actions is anticipated for spring/summer 2026.

**(2) Compliance with Grant Requirements:**

**(1.) FY23 EPA Brownfield CWAGST Grant (\$2M):** OC maintained compliance with the workplan, schedule (07/01/23-09/30/28), and EPA terms/conditions and achieved the expected results in just over two years. Progress reports and other deliverables were submitted on time and in compliance with EPA standards. All grant funds were expended and the Final Performance Report will be prepared in Summer 2026, at which time the CA will be formally closed. Property profiles in ACRES will continue to be updated to reflect current conditions and additional leveraged funds.

**(2.) FY24 EPA Brownfield Cleanup Grant (\$2M):** OC has maintained compliance with the workplan, schedule (10/01/24-09/30/28), and EPA terms and conditions. All progress reports have been submitted on time and in compliance with EPA standards. We expect to achieve the metrics defined in the workplan within three years.

# **ATTACHMENT A**

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## **Threshold Criteria Responses**

**1. APPLICANT ELIGIBILITY:** Ounalashka Corporation (OC) is the Alaskan Native Village Corporation for Unalaska, Alaska formed in 1973 pursuant to the Alaska Native Claims Settlement Act. OC is therefore eligible to receive a United States Environmental Protection Agency (EPA) Brownfield Grant.

**2. COMMUNITY INVOLVEMENT:** OC relies on collaboration to further its mission and understands community engagement is imperative to the success of its project. OC will continue working with its partners to solicit project input. Elements of our community engagement plan include the following:

- **Project Webpage:** OC created a brownfields webpage for the FY23 CWAGST Grant. This webpage will be updated with information regarding activities proposed for the FY26 Grant. The website will include information about how to provide feedback (such as informing site prioritization) and project updates.
- **Community Meetings:** As discussed in Section 2.e/2.f, OC hosts monthly brownfield-focused trilateral meetings with the City and Q-Tribe to coordinate project efforts under each agency's respective programs. This coordination leverages the use of grant funds by assigning individual sites/activities for each agency to fund and avoids overlapping efforts. Additionally, OC, the City, and Q-Tribe participate in the quarterly RAB meetings (described in Section 2.e/2.f) hosted in Unalaska. The RAB meetings are open to the public and hosted in person (the preferred format for our community) and virtually. RAB meetings are attended by dozens of community members, typically last up to three hours and include collective discussions and updates from USACE, OC, the City, and Q-Tribe about our respective environmental restoration efforts. RAB meetings are used to solicit input from the community on site prioritization/cleanup/reuse planning. OC will continue using the trilateral and RAB meetings to engage the community throughout this project.
- **Social Media:** OC and its partners have established followings on their Facebook pages that will be utilized to ensure residents, shareholders, and tribal members stay informed and are included in decision-making.
- **Emails & Newsletters:** Both OC and the Q-Tribe publish quarterly newsletters (*The Eider Pointer* and the *Unangan Tide*) to shareholders and Tribal members. These newsletters feature updates on environmental programs and will be used to solicit input throughout the project. OC added a column to the newsletter for updates related to EPA Grant projects.
- **Virtual & In-Person Meetings:** OC hosts in person meetings (the community's preferred format) but continues to provide opportunities for remote participation in all meetings to ensure effective engagement for those who cannot attend in person. All community meetings are advertised with information on how to attend virtually.

Implementing these engagement methods will allow stakeholders to provide meaningful project input. Additionally, OC has access to translation resources/interpreters that are available for meetings when requested.

**3. EXPENDITURE OF EXISTING GRANT FUNDS:** As of October 1, 2025, OC has drawn down \$1,899,690.80 (or 95%) of its \$2,000,000 FY23 EPA Brownfield Community-Wide Assessment Grant for States and Tribes. Documentation of our asap.gov Account Statement Inquiry is provided as [Attachment B](#) showing all drawdowns completed prior to October 1, 2025. Remaining grant funds are allocated for completing deliverables currently in progress as well as Quarterly Progress Reports, ACRES reporting, and Final Performance Reports. Formal project closeout will occur in Summer 2026.

**4. TARGET AREAS & PRIORITY SITES:** Three Target Areas (TAs) and nine priority sites have been identified for brownfield revitalization efforts. The TAs are described in Part 5 of the Application Information Sheet. Per EPA requirements, OC will assess a minimum of 10 sites during the period of performance.

**5. CONTRACTORS AND NAMED SUBRECIPIENTS:**

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

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