OUNALASHKA CORPORATION

Ounalashka Corporation
PO Box 149
Unalaska, Alaska 99685-0149

(907) 581-1276 | ounalashka.com

RE: FY2026 EPA Brownfields Cleanup Grant Application

R10-26-C-001

Ounalashka Corporation is pleased to submit this proposal for FY2026 Brownfields Cleanup 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) Grant Type: Single Site Cleanup
(b) Federal Funds Requested: $4,000,000

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

5. Property Information:
(a) Property Name: Blueberry Loop Landfill #3
(b) Property Address: Blueberry Loop Road, Strawberry Hill, Amaknak Island, Unalaska, AK 99685
(c) Figure (Optional): A figure depicting the site location is attached at the end of this letter.

6. Contacts:
(a) Project Director:
Name: Natalie Cale, CEO/General Counsel
Phone: 907-947-7105 | Email: 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
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, 2022) but a peak population of up to 10,000 during fishing season.

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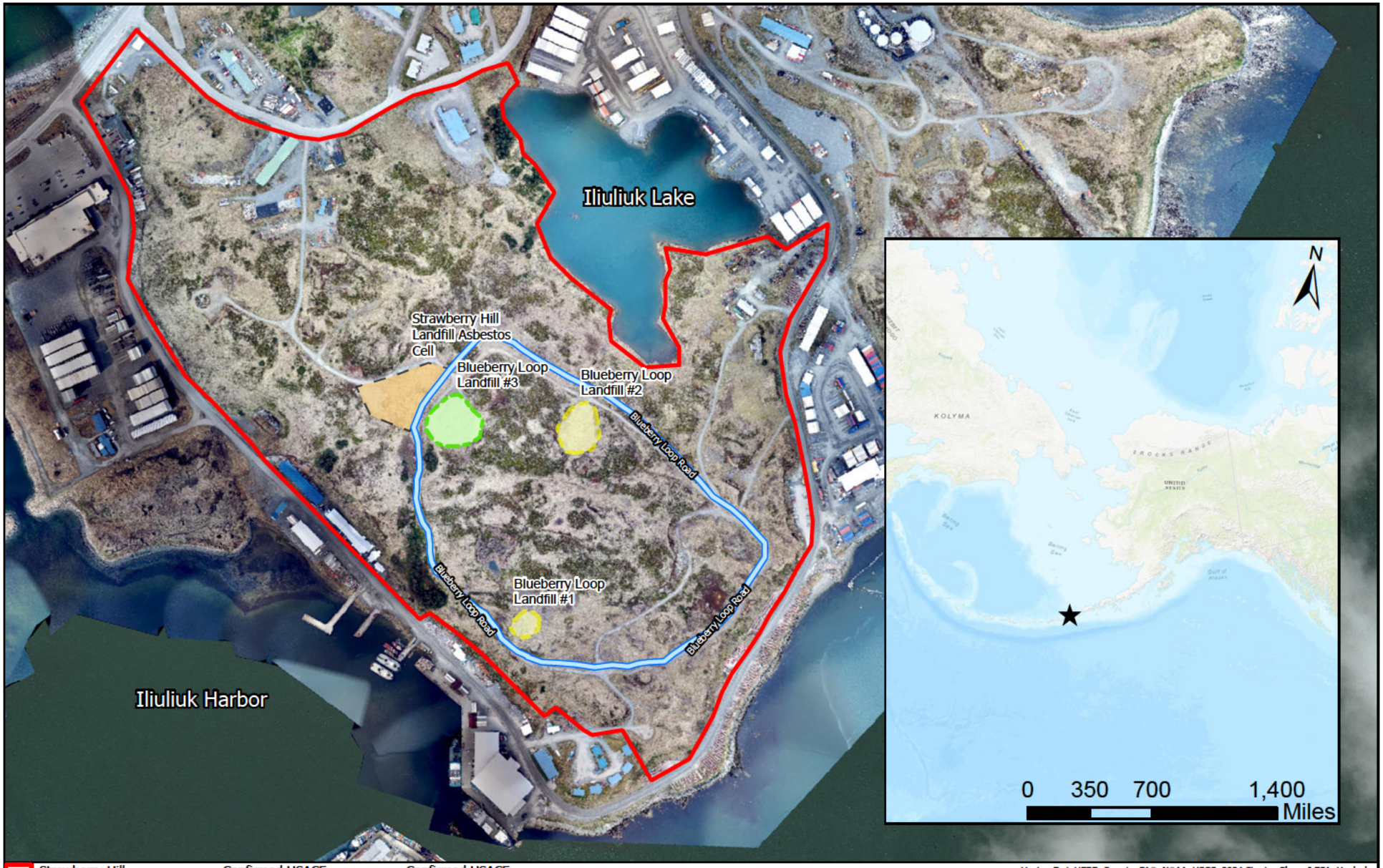
8. Other Factors:

Other Factors Criteria	Page #
Community population is 15,000 or less.	1 & 4
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	4*
The proposed brownfield site(s) is impacted by mine-scarred land.	NA
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	NA
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1**
The proposed site(s) is in a federally designated flood plain.	NA
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local the impacts of extreme weather events and natural disasters.	3
The target area(s) is impacted by a coal-fired power plant has recently closed (2015 or later) or is closing.	NA

NA = Not applicable
**The Qawalangin Tribe is a federally recognized Tribe.*
***The site is not directly adjacent to a body of water but is upland of Iliuliuk Lake and Iliuliuk Harbor with streams that discharge to these water bodies.*

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



Strawberry Hill

Other Confirmed USACE Landfill Disposal Sites within Target Area

Blueberry Loop Road Target Area

Confirmed USACE Landfill - Strawberry Hill Landfill Asbestos Waste Cell (Recipient of FY24 EPA Brownfield Cleanup Grant)

Confirmed USACE Landfill - Blueberry Loop Landfill #3 (Subject of FY26 EPA Brownfield Cleanup Grant)

Notes:
1. Locations of Landfill Disposal Sites are approximate.
2. Landfills colored orange and yellow are not apart of this project and shown for reference only.

Vantor, Esri, HERE, Garmin, FAO, NOAA, USGS, 2024 Stantec Phase I ESA, Unalaska ArcGIS Maps, USACOE/ USACE Reports.

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1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

1.a. Overview of Brownfield Challenges & Description of Target Area: Ounalashka Corporation (OC), a legally recognized Alaska Native Village Corporation **(ANVC)**, ientrusted with the lands of the **Qawalangin Tribe of Unalaska (Q-Tribe)**. OC owns 115,200 acres of land 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 are connected by a 500-foot long bridge and together the islands include 80% of the urbanized area of the City of Unalaska (City; pop. 5,251). The City occupies a 210 sq. mi. area spanning the Islands and is the westernmost population center of the US. The physical isolation of the area is highlighted by the 800-mile distance from the City to the Municipality of Anchorage where the nearest hospital is located. This isolation is one of many factors shaping the area's extraordinary brownfields challenges. Amaknak Island (Amaknak) contains 59% of the City's population which occupies <3% of its land area.[a] The City is also home to 81% of the population living within the Aleutians West Census Tract (CT).

The original inhabitants of the Aleutian Island Chain, 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.[b] Their lands were seized by the military, the buildings 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 underground and above ground storage tanks (USTs/ASTs) for heating oil were installed to supply oil used to heat individual buildings. 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 Corporations, including OC. The Q-Tribe lands conveyed 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.[c]

The brownfields challenges include: (1) large number of sites in 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 exclusion of 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 disposal costs associated with transporting contaminated media to the Pacific NW; and (7) redevelopment challenges associated with a remote island location.

The **Blueberry Loop Landfill Site** is a 25-acre area that includes three US Army Corp of Engineers (USACE) landfills within the 136-acre **Strawberry Hill Target Area (TA)**, located at the center of Amaknak Island in the Aleutians West CT #02016000200. The TA is surrounded by residential areas, WWII Museum, and several shipping companies that support the local fishing industry. The entire Strawberry Hill area was subject to intensive military use during WWII, with dozens of military structures and two 1-million-gallon petroleum USTs. The central location of the TA, combined with the high ground away from sensitive coastlines, make it an ideal location for future development of housing, community center/tsunami evacuation center, as well as a desperately needed regional hospital that serves all remote communities in the Aleutian Island chain. ***Lingering contamination is a concern repeatedly voiced by investors. Having a remediated site to market for redevelopment will remove current barriers to raising capital for essential projects. OC has not been able to rely on USACE for timely cleanup of contamination to solidify real development opportunity. OC has waited 52 years to utilize these lands and developers will not expend resources without confirmed cleanup funding and timelines.***

1.b. Description of the Proposed Brownfield Site: The TA was subject to intensive use by the military during WWII and is impacted by significant "area-wide" contamination concerns (including unexploded ordinance, 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 Programs established in 1986. **Blueberry Loop is a 25-acre FUDS containing three landfills on the eastern portion of Strawberry Hill** and upgradient of ***Iliuliuk Lake*** to the north and ***Iliuliuk Harbor*** to the south. This area of the Island was used historically as a sheep ranch and work camp until WWII when the military took control and constructed two 1-million-gallon petroleum USTs, a water tower, and several WWII structures. In the 1980s, USACE created four landfills on Strawberry Hill as part of the WWII Debris Disposal and Site Restoration Project**. The focus for this grant is Blueberry Loop Landfill #3 (the largest of the Blueberry Loop Landfills) where USACE disposed of hazardous debris from demolition of former WWII structures,**

[a] *City of Unalaska, Comprehensive Plan 2020 – Unalaska, Alaska. Link.*
[b] *Aleutian Pribilof Islands Association, History. Link.*
[c] *Division of Spill Prevention and Response (alaska.gov). Accessed 01/14/26.*

including ashes from burned buildings, wood, metal, concrete, and asbestos-containing materials (ACM). Friable asbestos waste was required to be bagged prior to disposal but there is documentation these protocols were not followed and friable ACM was openly dumped into the landfills. The ADEC permit for the landfills specified a four-foot vertical separation between the groundwater table and the bottom of the waste, three feet of cover over the waste, including a 24-inch final cover with established vegetation. It is unknown if the landfills were constructed, operated, and closed in accordance with the issued permit requirements. Furthermore, the landfills were not surveyed to document as-built conditions and records of volume and types of wastes disposed and photographic records were not provided as part of the permit conditions to ADEC. The Blueberry Loop Landfills were closed by USACE in late 1980s and covered with fine-grained clay and sandy silt. There have been no environmental cleanup activities since closure. The ADEC Permit did not require periodic monitoring or inspections, fencing, or hazardous waste signage. These actions may have been satisfactory at the time but do not meet today's standards to be protective of human health and the environment.

Site characterization activities were completed in May 2025 for the Blueberry Loop Landfills and were completed in October 2024 for the adjacent Strawberry Hill Landfill (SHL) Asbestos Waste Cell – a 1-acre FUDS directly north of Blueberry Loop Landfill #3 (the largest landfill and subject of this grant application).

During the May 2025 investigation, a series of test pits were excavated across each of the three Blueberry Loop Landfills to evaluate the horizontal and vertical limits and types of buried wastes, as well as collect samples for laboratory analyses to characterize waste material and evaluate potential impacts to the surrounding soil. As practicable as possible, samples were collected representative of dissimilar waste material encountered at each landfill. The results of the investigation revealed:

(1.) Stratified waste/fill material was encountered in most of the test pits. The encountered waste represented typical construction and demolition debris comingled with an overburden soil.
(2.) In soil samples collected in Blueberry Loop Landfill #3, concentrations of select metals (predominantly Arsenic and Manganese) were reported in excess of the ADEC cleanup standards, including the ADEC Human Health Standards and the ADEC Migration to Groundwater Standards.
(3.) The encountered waste contained within Blueberry Loop Landfill #3 comprises a surface area of slightly less than one acre and a calculated volume of approximately 20,000 cubic yards (CY).

Investigations prior to the May 2025 event confirmed concentrations of iron, arsenic, and cadmium in surface water (which discharges to ***Iliuliuk Harbor***) exceeding ADEC cleanup levels. Additionally, detectable concentrations of Polycyclic Aromatic Hydrocarbons (PAHs) and metals were found in groundwater as shallow as 5 feet below ground surface. These results create concerns the shallow groundwater table is transporting contaminants downgradient to ***Iliuliuk Lake*** and ***Iliuliuk Harbor*** which are popular fishing locations for locals as well as for subsistence use areas for tribal members. Under this project, OC is proposing to excavate and remove the waste and contaminated soil at Blueberry Loop Landfill #3. Waste will be sorted and non-hazardous waste will be placed in an on-island Inert Waste Monofill and hazardous waste (~2,000 tons) will be transported off-island. The excavated area will be backfilled with clean fill materials suitable for future redevelopment activities. The site is a high priority for redevelopment due to its size, relatively flat terrain, desirable location, high ground, and the scarcity of developable land available.

1.c. Reuse Strategy & Alignment with Revitalization Plans: Projected reuses for Blueberry Loop and Strawberry Hill as a whole include a mix of affordable housing, commercial and institutional uses – in particular, a much needed regional hospital that serves all remote communities in the Aleutian Island chain. These uses are consistent with the City of Unalaska's *2020 Comprehensive Plan* and associated *2020 Housing Plan* which identify the TA as one of three primary housing sites. The Housing Plan identifies eight predevelopment steps necessary to successfully position the TA for housing, several of which will be completed through the EPA Cleanup Grant. Development of a regional hospital on Strawberry Hill is consistent with the City's *2015 Land Use Plan* and ***identified by residents as one of their top ten priorities in the 2020 Comprehensive Plan***. Additionally, Strawberry Hill includes six sites identified in the **Q-Tribe's *Strategic Project Implementation Plan (SPIP)*** as priority sites for cleanup activities, with the Blueberry Loop Landfills being one of the highest priorities to address. Therefore, this project addresses high priority projects for OC, the City and the Q-Tribe.

1.d. Outcomes & Benefits of Reuse Strategy: The project described herein will have significant direct and indirect economic impacts. Housing is a key component of planned reuse for the TA and the lack of quality and affordable housing has been repeatedly identified as a key obstacle for economic development. The *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 the Island's future, without which Unalaska will not be able to retain its current residents or accommodate additional residents. Therefore, over the next 10 years it will be essential to make more land available for the development of quality, affordable housing." Development of housing results in the direct economic benefits from construction, but in Unalaska, the indirect benefits are even 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 surveys conducted for the *Comprehensive Plan*, the seafood processing companies and the US Coast Guard cited the lack of housing as a key concern. The City and School District are also 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 and adds to the overall staffing/recruitment challenges for local employers. Development of a regional hospital in the TA would result in an array of economic benefits, beginning with construction jobs associated with an estimated $100M construction project, and continuing with local spending by 50-60 additional professionals earning 6-figure salaries in the medical industry. Not only

will the hospital benefit the community of Unalaska, it will serve all remote communities in the Aleutian Islands that are suffering from the same challenges with access to the nearest hospital being over 800 miles away in Anchorage.

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 cleanup of upland areas (such as the ***Strawberry Hill TA***) support efforts to build community resiliency by directing development away from sensitive coastlines and planning for the future relocation of homes impacted by erosion. Additionally, the strategy to build in the TA also supports efforts to preserve coastal land development for conservation areas. These areas can then be reserved for seawall and natural storm barriers to protect infrastructure – such as allowing coastal wetlands to migrate inland through setbacks and density restrictions.

Facilitating Renewable Energy Projects: Finally, 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 of **the largest geothermal project in the State** (the Makushin Volcano Geothermal Project) to replace fossil fuel heating sources with geothermal sources. The new geothermal network currently under development will be extended to Strawberry Hill to serve as the primary heating source for all development in the TA.

1.e. Resources Needed for Site Characterization: The May 2025 field event described in Section 1.b included a robust site investigation to address data gaps from prior investigations. Site characterization activities are complete (as confirmed by ADEC in their letter provided in Attachment B). Should something warrant further investigation, OC is applying for a FY26 EPA Brownfield Community-Wide Assessment Grant for States and Tribes (CWAGST) Grant that could fund additional site investigation activities. Additionally, OC is also eligible to apply to EPA's Contaminated ANCSA Lands Program for additional funding for sites where contamination has been confirmed present prior to conveyance by the US Government to OC.

1.f. Resources Needed for Site Remediation: The amount of hazardous debris (ACM, metal, ash, concrete rubble, etc.) and contaminated soil in Blueberry Loop Landfill #3 is anticipated to be 2,000 tons. **The amount of funding requested under this grant application will cover the cost of complete excavation and debris removal from Blueberry Loop Landfill #3. This includes transport and disposal of hazardous waste as well as construction of an on-island Inert Waste Monofill for disposal of non-hazardous materials.** If unforeseen issues arise and additional funds are needed, OC will apply to the EPA Contaminated ANCSA Lands Program to address any funding gaps.

1.g. Resources Needed for Site Reuse: 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. 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 redevelopment funding sources:

Funding Resources for General 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 have been used in Unalaska by the City to fund upfront costs for utility extensions and other infrastructure improvements.
- **US Dept. of Transportation (DOT) Better Utilizing Investments to Leverage Development (BUILD; formerly "RAISE") Grant**: The Q-Tribe has been successful in securing DOT funding for infrastructure projects on property owned by OC.

Funding Resources for Housing Development & Community Center:

- **Private Investment**: The primary source of funding for housing projects is likely to be private investment. OC has significant experience in working with partners to attract funding needed to finance housing and other projects. OC has also developed commercial, residential, and other types of developments on its own.
- **Low Income Housing Tax Credit Program (LIHTC)**: The 2020 *Housing Plan* included a recommendation the City and OC 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. T**his application can be completed once land (such as the land in the TA) is cleaned up and made available for redevelopment.**
- **The Aleutian Housing Authority** develops affordable housing in remote areas. The Aleutian Housing Authority is the primary provider of affordable housing services in the Aleutian/Pribilof Islands Region.

Funding Resources for Hospital Development:

- **Denali Commission**: An independent federal agency designed to provide critical utilities, infrastructure, and economic support throughout Alaska. With the creation of the Denali Commission, Congress acknowledged the need for increased focus on Alaska's remote communities. The Denali Commission receives hundreds of millions in appropriations from the US Dept. of Health and Human Services that are matched by other federal agencies, the State, philanthropic organizations, and local communities to fund development of hospitals and medical clinics in rural and underserved areas.
- **Rasmuson Foundation**: Provides grants to support construction of medical facilities in underserved Alaskan communities.

- **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. ***Lingering contamination is a concern repeatedly voiced by investors. Having a remediated site to market for redevelopment will remove current barriers to raising capital for essential projects. OC has not been able to rely on USACE for timely cleanup of contamination to solidify real development opportunity. OC has waited 52 years to utilize these lands and developers will not expend resources without confirmed cleanup funding and timelines.***

1.h. Use of Existing Infrastructure: Only 5% of OC lands are located within or immediately adjacent to the urbanized areas of the City of Unalaska and the areas that are served by existing road, water, sewer, and other utilities. **The TA is one of the only areas available to build on in Unalaska that is already served by roads and utilities (electrical, water and sewer).** The location in the center of the City and the large swath of land it provides makes it an ideal location for a hospital, housing developments, and a community center/ tsunami evacuation center, while leveraging the existing infrastructure. Some minor additional infrastructure (internal access roads and utility connections for new buildings) will be required.

2. COMMUNITY NEED & 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) and all residents 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. It is also the largest fishing port in the US, which drives the local economy. 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 cleanup a site that will help address the area's extreme housing shortage and provide a much-needed hospital for Unalaska and the surrounding communities in the Aleutian Islands (the nearest hospital is over 800 miles away in Anchorage). These developments will benefit the Q-Tribe members, the larger community, and other remote communities in the Aleutian Islands who are also challenged with lack of access to medical care.

2.b. Health or Welfare of Sensitive Populations: Unalaska's fishing industry attracts workers from around the world, resulting in a highly diverse population. The majority 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.[d] Geospatial mapping tools were used to assess socioeconomic indicators for the City relative to the State as a whole (**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 at 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, and Washington DC.[e]

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.*

The health challenges for residents in Unalaska are detailed in Section 2.c. A key issue is the low rates of preventative care measures by residents, which is attributable to the limited access to medical services, including many specialized services. The nearest emergency room and hospital is in Anchorage, more than 800 miles away. The lack of a hospital is not just a health issue but also a welfare issue, as expectant mothers must relocate to Anchorage during the last month of their pregnancy, away from their family support network, in order to be assured of access to a hospital in the event of an early or high-risk delivery. Another 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 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.

[d] Source: 2019-2023 American Community Survey, 5-yr data (obtained from www.factfinder.census.gov).
[e] Sobel, Z. (2019, January 7). Expensive Groceries and Health Care Contribute to Unalaska's High Cost of Living. *KUCB Channel 8 TV*. Link.

The reuse plans for the TA 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 current aging housing stock (in particular the WWII cabanas residents are still living in). The plans to support development of a regional hospital will address both health and welfare issues related to the limited access to healthcare services. Affordable housing will attract doctors and other staff needed for the hospital.

2.c. Greater Than Normal Incidence of Disease & 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.[f] 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 Alaskan Natives. For birth defects, the prevalence rate among Alaska Native children was 651 per 10K live births – a rate nearly two and half times higher than among non-native children (266/10K).[g] Multiple studies have documented a high incidence of Parkinson's Disease (PD) among Alaskan Natives.[h] 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 Alaska 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 the Strawberry Hill TA.

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 (CDCP) Places: Local Data for Better Health Website[i] 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).

TABLE 2 Preventative Health Measure	Prevalence Rate in Aleutians West CT	Ave. Prevalence Rate in US	TABLE 2 Preventative Health Measure	Prevalence Rate in Aleutians West CT	Ave. Prevalence Rate in US
Current Lack of Health Insurance [A]	19.1	14.1	Mammography Use [D]	66.2	77.8
Visit to Doctor for Routine Checkup [B]	66.8	75.0	Cervical Cancer Screening [E]	74.9	85.5
Visit to Dentist during 2018 [B]	62.1	66.2	Colon Cancer Screening [A]	52.5	65.0
Taking Medicine to Control High Blood Pressure (HBP) [C]	63.2	76.2	Older Adult Men – Current on Core Prevention Measures [F]	18.9	32.7
Cholesterol Screening [B]	80.0	86.0	Older Adult Women – Current on Core Prevention Measures [F]	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 will result in healthier homes that will help reduce asthma rates. A regional hospital, will increase residents' access to both preventative health measures and emergency care services, facilitate earlier diagnosis and treatment of conditions such as PD that has 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 TA would likely rank very high in this category given the presence of at least four landfills in the Strawberry Hill TA.

Table 3: Environmental Exposure Indices for Strawberry Hill TA	
Environmental Impact Indices	**Percentile in AK**
Lead Paint Indicator	**87%**
Risk Mgmt. Program (RMP) Facility Proximity	**78%**
Hazardous Waste Proximity	*Not Available*
Superfund Proximity	*Not Available*
Underground Storage Tank Proximity	63%

Table 4: Demographic Indices for Strawberry Hill TA		
Category	**Disadvantaged Indices**	**Percentile in US**
Demographics	Minority Population	**77%**
Housing	Lack of Indoor Plumbing	**96%**
Legacy Pollution	FUDS	**Yes**
Legacy Pollution	Proximity to RMP Facilities	**92%**
Workforce Development	Linguistic Isolation	**80%**

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

It should be noted that 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 federal 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

[f] *Alaska Native Tribal Health Consortium, Epidemiology Center. Cancer in Alaska Native People, 1969-2018, the 50-Year Report (2021).*
[g] *AK Division of Public Health, AK Birth Defects Registry Table C-58.*
[h] *Parkinson's disease among American Indians and Alaska natives: A nationwide prevalence study.*
[i] CDCP PLACES: Local Data for Better Health. Health Rankings for City of Unalaska, Alaska. Link.

program within DERP, 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.[j] ***The lack of progress in assessing FUDS continues to negatively impact OC, the Q-Tribe, and greater Unalaska community. It contributes to ongoing challenges of attracting developers or grant opportunities to build housing, and in developing OC's land for uses that would enhance the quality of life, create economic opportunities, and improve access to healthcare.***

The EPA Grant will be used to clean up the site, which is a strategic community priority based on its potential for quality affordable housing and a regional hospital. As mentioned in Section 1.c, this site was ***identified by residents as one of their top 10 redevelopment priorities in the 2020 Comprehensive Plan.*** Cleanup of TA will not displace any residents or businesses and will significantly benefit the 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 96th percentile in the US for lack of indoor plumbing (see **Table 4**). The TA is one of the only developable areas of Unalaska that is served by utilities and can support a housing development. Additionally, the proposed hospital project in the TA will also bring much needed healthcare services to the island so residents do not have to travel 800 miles to Anchorage for the nearest hospital. Lack of access to both preventative care and emergency care services is a significant issue impacting the community as the limited care results in delays in diagnosis of critical illnesses. Furthermore, lack of access to emergency services reduces the likelihood of surviving a stroke or cardiac event and contributes to the lower life span of residents in Unalaska compared to the rest of the state. Similarly, individuals requiring cancer and other critical care treatments also have to leave their families and those caring for them in times of need to relocate to Anchorage for prolonged medical care. Due to the extreme housing shortage on the island, medical and other much needed professionals do not have the option to live permanently in Unalaska. These projects work in tandem to provide housing that will attract and retain talent and also provide much needed medical services.

2.e. Project Involvement / 2.f. Project Roles: The partners identified below play significant roles in implementing our environmental restoration projects and helping the community achieve desired reuse goals. As described in Section 1.g, 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** ([redacted]): The Q-Tribe will continue to be an essential partner. Their involveme[redacted]bal members and supporting outreach. They will continue to provide support in pursuing and securing funding to advance the projects on OC lands.
- **City of Unalaska** ([redacted]): 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 for infrastructure improvements, and in the long-term maintenance of roads, sewers, and the water system. The City will continue to work with OC to advance plans for new housing and the regional hospital.
- **USACE Restoration Advisory Board (RAB)** ([redacted]): 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, in part, because Blueberry Loop is a FUDS. In order to better coordinate cleanup activities performed using the EPA Grant with on-going work through the FUDS Program, OC will continue to use our allocated time of the RAB meetings to provide project updates and facilitate project involvement from key stakeholders as well as the general public.
- **Museum of the Aleutians (MOTA)** ([redacted]): 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 compliance with National Historic Preservation Act (NHPA) requirements 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)** ([redacted]): The IFHS is the primary health service provider in Unalaska. They wi[redacted]nput on cleanup and reuse decisions as they relate to public health. The IFHS will continue to be an essential partner in efforts to develop a regional hospital, as they have the greatest understanding of what services are currently lacking.
- **Aleutian Pribilof Islands Association (APIA) Oonalaska Wellness Center** ([redacted]): The APIA is a non-profit focused on ad

[j] *Division of Spill Prevention and Response (alaska.gov).* Accessed 01/14/26.

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 led past efforts to bring a regional hospital to the City (which stalled due to a lack of clean, shovel-ready land) and are expected to be a key partner for continuing efforts once we have a site ready for development. They will continue serving on the RAB and providing input on cleanup and reuse planning.

- **Aleutian Housing Authority (AHA) (**[redacted]**)**: The AHA is the primary provider of affordable housing serv[redacted]ude 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) (**[redacted]**)**: ANTHC is an intertribal health non-profit that assists Tribal members with health-[redacted]ulted to assist with connecting resources and informing development of an on-island hospital.
- **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 closely with its partners to solicit project input. At the beginning of the project, OC will prepare a Community Involvement Plan (CIP) that will include the following:

- **Project Webpage**: OC will create a project-specific webpage on its website to post the CIP, ABCA and project updates. The website will include information about how to provide feedback on cleanup plans and regular 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 our respective programs. This coordination leverages the use of our 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 social media channels on Facebook that will be utilized to ensure that residents, shareholders, and tribal members stay informed and are included in the decision-making process.
- **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.
- **Local Broadcast and Print Outlets:** KUCB is a local television/radio station that provides extensive coverage on local issues – including efforts to assess, cleanup, and redevelop the former military sites. The *Bristol Bay Times* is the local newspaper. OC works with both to promote project meetings, keep the public informed of progress and plans for individual sites, and to further educate the public on issues related to contaminated sites.
- **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 obtain a Zoom link.

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, & MEASURING PROGRESS:

3.a. Proposed Cleanup Plan: The proposed cleanup plan consists of excavating all contents of Blueberry Loop Landfill #3 and construction of an on-island Inert Waste Monofill. Upon removal, all contents will be sorted and screened based on both visual observations and analytical testing where necessary. Construction debris consisting of concrete, wood, metal, etc. will be inspected to document it is free of hazardous constituents, primarily LBP and PCBs. As needed, painted or stained surfaces will be analyzed for those constituents. Material deemed free of those constituents will be placed into the Inert Waste Monofill consisting of non-regulated waste and materials. Materials deemed to contain hazardous materials will be transported to an appropriate disposal facility (via barge to Seattle and then by rail to the appropriate disposal facility in Oregon or Idaho). Non-impacted metal will be removed for recycling. Site restoration will consist of importing clean backfill. Long-term (30 years) maintenance and monitoring would be required. Due to the extraordinary cost of off-island transport, construction of an Inert Waste Monofill on island is a critical step in moving forward all of OC's landfill cleanup projects.

As previously mentioned, cleanup of the adjacent Strawberry Hill Landfill Asbestos Waste Cell is already underway using a FY24 EPA Brownfield Cleanup Grant. The landfill cleanup strategy is to carry forward the cleanup momentum started with the FY24 Grant by addressing the largest of the three Blueberry Loop Landfills which is also the landfill closest to the Asbestos Waste Cell (see the figure provided with the application information sheet). ***Removal of the Asbestos Waste Cell and Blueberry Loop Landfill #3 will provide the largest development area for first phase of development activities to proceed.***

3.b. Project Implementation / 3.c. Anticipated Project Schedule / 3.d. Task/Activity Lead / 3.e. Outputs: The scope of work

has been organized into the tasks below. We expect the project will be completed within two years.

Task 1: Project Management, Reporting & Other Eligible Activities
b. Project Implementation: 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.
c. Project Schedule: Activities will be ongoing throughout the project period (which we anticipate will be 2 years).
d. Task Lead: OC with support from the Qualified Environmental Professional (QEP) Contractor.
e. Output(s): 8 Quarterly Reports; 2 FFRs; prompt ACRES reporting; 1 Final Performance Report and associated financial documents; 2 brownfield conferences attended by 2 OC staff; 48 check-in meetings with QEP Contractor (24 meetings/year x 2 years); 24 check-in meetings with EPA and ADEC (12 meetings/year x 2 years).
Task 2: Community Engagement
b. Project Implementation: A detailed description of the planned methods for involving the public is provided in Section 2.g. This task includes: 1) preparing a CIP; 2) monthly trilateral meetings and quarterly RAB meetings; 3) hosting one public meeting/year; 4) preparing fact sheets and press releases; 5) posting regular updates to OC's Facebook page; and 6) providing project updates in OC's shareholder newsletter.
c. Project Schedule: The CIP will be completed by the second quarter (2Q) of the project. Project information in OC's newsletter will also be shared by 2Q. One community meeting will be hosted per year with the first hosted in coordination with publication of the revised/final ABCA. Trilateral meetings will continue monthly and RAB meetings will continue quarterly. Project updates will be shared at these meetings.
d. Task Lead: OC with support from the QEP Contractor.
e. Output(s): CIP. 12 brownfield-focused trilateral meetings/year, 4 RAB meetings/year, 1 public meeting/year and meeting materials. Project posters/fact sheets posted to OC's Facebook page. Public notices published in the local newspaper, OC's shareholder newsletter, and OC's website.
Task 3: Remedial Activities
b. Project Implementation: Property cleanup/cleanup planning will include: 1) Endangered Species Act (Section 7) and National Register of Historic Places (Section 106) consultations; 2) Update existing Master Quality Assurance Project Plan (QAPP); 3) finalize the ABCA; 4) Develop a Remedial Action Work Plan (RAWP) & Monofill Design; 5) QEP oversight of remedial activities (including a Davis-Bacon Act [DBA], Build America Buy America [BABA], and EPA compliant (2 CFR § 200.317-326) request for quotation process to secure cleanup and waste transportation contractors); 6) implement the cleanup plan described in 3.a, including all survey, permitting and pre-work submittals; Health and Safety Plan (HASP) preparation; monofill construction; controls to secure the site and remove, load, transport, and dispose of hazardous debris and contaminated soil as well as inert waste; and importing clean backfill; 7) provide archaeological monitoring and biological monitoring for protected bird species when necessary (part-time monitoring is anticipated based on project experience); and 8) preparation of a Closure Report documenting all aspects of the cleanup project. Coordination with ADEC under their voluntary response program will also be part of this task.
c. Project Schedule: Year 1: Items 1-5 described above will be completed. Year 2: Items 6-8 will be completed.
d. Task Lead: QEP Contractor under the direction of OC.
e: Output(s): Section 7 & 106 Consultations, Updated QAPP, HASP, Final ABCA, Monofill Design, RAWP with Cleanup Specifications, DBA & BABA Compliance, Site Cleanup, Archaeological & Biological Monitoring Reports, Closure Report.

3.f. Cost Estimates: 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. ***The majority of OC's personnel time will be provided as in-kind contributions***. OC is requesting 4% of the grant for indirect costs ($160K) for administrative expenses. Approximately ***95% of grant funds ($3.81M of contractual and construction services) are allocated for environmental cleanup***. As described above, ***we anticipate the project will be completed in two years***.

Task 1: Project Mgmt., Reporting & Other Activities | Total Budget = $75,000 ($45,000 Direct + $30,000 Indirect)
Personnel & Fringe Total = $3,000 (CA Management Activities [30 hours x $100/hr])
Travel Total = $9,000 (1 National Brownfield Conference [$4,500/person x 2 OC staff])
(Note: Travel costs include airfare, lodging, meals, transportation, and incidental expenses.)
Other Total = $600 (Conference Registration Fees [$300/person x 2 OC staff])
Contractual Total = $32,400 • Compliance Reporting (Quarterly, Annual & Final Reports, & ACRES updates): $18,000 (90 hours x $200/hr) • Biweekly Project Meetings: $9,600 (24 meetings/yr x 1 hour/meeting x 2 years x $200/hr) • Monthly Agency Meetings: $4,800 (12 meetings/yr x 1 hour/meeting x 2 years x $200/hr)
Task 2: Community Engagement | Total Budget = $63,000 ($33,000 Direct + $30,000 Indirect)
Personnel & Fringe Total = $3,000 (Project Webpage & Outreach Materials [30 hours x $100/hr])

Contractual Total = $30,000
- Develop CIP & Project Webpage Content: $10,000 (50 hours x $200/hr)
- Stakeholder Meetings (Public, Trilateral & RAB Meetings): $20,000 (100 hours x $200/hr)

Task 3: Remedial Activities | Total Budget = $3,862,000 ($3,762,000 Direct + $100,000 Indirect)

Personnel & Fringe Total = $2,000 (Remedial Action Oversight [20 hours x $100/hr])

Contractual Total = $441,363
- Section 106 Consultation: $10,000 (50 hours x $200/hr)
- Section 7 Consultation: $10,000 (50 hours x $200/hr)
- Compliance with Other Federal Cross Cutters (prevailing wages, etc.): $8,000 (40 hours x $200/hr)
- Finalize ABCA: $5,000 (25 hours x $200/hr)
- Update Master QAPP: $4,613 lump sum
- Health & Safety Plan: $5,000 (25 hours x $200/hr)
- Remedial Action Work Plan & Monofill Design: $105,000 (525 hours x $200/hr)
- Bid Support & Bid Award: $15,000 (75 hours x $200/hr)
- Field Event Preparation: $18,000 (90 hours x $200/hr)
- Contractor Oversight: $24,000 (120 hours x $200/hr)
- Archaeological Monitoring: $30,250 (11 weeks x $2,750/week)
- Archaeological Monitoring Report: $4,750 lump sum
- Biological Monitoring*: $37,500 (11 weeks x $2,500/week)
- Biological Monitoring Report: $2,500 lump sum
- Air Monitoring: $15,750 (3.5 months x $4,500/month)
- Construction Completion Report: $36,000 (180 hrs x $200/hr)

**Part-time monitoring for archaeological and biological resources is anticipated based on project experience.*

Construction Total = $3,431,637*
- Pre-Construction Survey: $15,000 lump sum
- Monofill Permit Fee: $2,780
- Monofill Construction & Final Survey: $115,000 ($100,000 for construction + $15,000 for survey)
- Equipment Rentals & Field Supplies: $486,002 (detailed list of equipment & supplies is provided in Table 1 of ABCA)
- Waste Transport & Disposal: $940,555 ([153 Supersacks x $611/each] + [48 Containers Transported to Unalaska 48 x $314/each] + [2,000 tons hazardous waste transport/disposal x $416/ton])
- Analytical Fees: $35,000
- Backfill Materials: $928,000 (32,000 tons x $29/ton)
- Contractor Labor: $755,200 (800 hours at anticipated billing rates provided in Table 1 of ABCA)
- Contractor Expenses (airfare, lodging & per diem): $154,100

**A detailed breakdown of costs included for construction activities is provided in the ABCA (Attachment E).*

Other Total = $7,000
- ADEC Fees: $5,500
- Cleanup Signage: $1,500

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: Remedial Activities	Total
Personnel	$1,950	$1,950	$1,300	**$5,200**
Fringe Benefits	$1,050	$1,050	$700	**$2,800**
Travel	$9,000	$0	$0	**$9,000**
Contractual	$32,400	$30,000	$321,363	**$383,763**
Construction	$0	$0	$3,431,637	**$3,431,637**
Other	$600	$0	$7,000	**$7,600**
Total Direct Costs	$45,000	$33,000	$3,762,00	**$3,840,000**
Total Indirect Costs	$30,000	$30,000	$100,000	**$160,000**
TOTAL BUDGET	**$75,000**	**$63,000**	**$3,862,000**	**$4,000,000**

3.g. Plan to Measure & Evaluate Environmental Progress & Results: Upon notice of award, a project schedule will be prepared with key tasks, milestones, and reporting requirements, including the outputs associated with each task detailed in Section 3.b. This schedule will be reviewed on a biweekly basis throughout the project to identify any potential deviations so corrective measures can be developed and implemented (if needed). All project outputs are listed in Section 3.b. The overall project result is the cleanup of the largest landfill located within a 25-acre FUDS (including removal of hazardous waste from the island) that will be ready for redevelopment. The final redevelopment area will be much larger but before redevelopment activities can be initiated, cleanup of the landfills must be completed, with this one cleaned up first. Eventual project outcomes, and the units that will be used to measure them include: (1) Total acres redeveloped; (2) Number of jobs directly and indirectly created; (3) Number of affordable multi- and single-family housing units created; (4) Community needs addressed: (number of priorities addressed from *2020 Comprehensive Plan*, first hospital and new health care services available on the island, etc.); and (5) Amount of funding leveraged. All outputs and outcomes will be reported in ACRES.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

4.a. Organizational Structure / 4.b. Description of Key Staff: OC is well qualified to lead this project having developed the organizational capacity and grant management experience during implementation of other state and federal grants. 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 (Native American Lands Environmental Mitigation Program), 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 has 11 years of experience in finance and manages all financial compliance aspects OC's grants, including budget tracking, documentation, reporting, and drawdowns. Eric will review all quarterly budget summaries for accuracy and consistency.

4.c. 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 and remediation contractor 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 equipment to the island and mobilizing waste off island. Therefore, it is critical that we use contractors with a history of successful performance in the Aleutian Islands. OC notifies contractors of RFP/Qs via direct email, announcements at bimonthly 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 Contractor 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*) for procuring a QEP, cleanup contractor and any additional project resources.

4.d. 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 (37 parcels; 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.
- 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 (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 are anticipated for spring/summer 2026.

(2) Compliance with Grant Requirements:

(1.) FY23 EPA Brownfield CWAGST 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.) 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.

1. APPLICANT ELIGIBILITY:

1.a. Applicant Type: 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 Cleanup Grant.

1.b. Federal Taxation Exemption Status: Not applicable. (OC is not a 501(c)(4).)

2. PREVIOUSLY AWARDED CLEANUP GRANTS: The Blueberry Loop Landfill #3 site has never received EPA Brownfield Cleanup Grant funding.

3. EXPENDITURE OF EXISTING MULTIPURPOSE GRANT FUNDS: OC does not have an open EPA Brownfield Multipurpose Grant, nor have they ever received a Multipurpose Grant.

4. SITE OWNERSHIP: OC is the sole owner of the site and will retain ownership through cleanup. The property was conveyed to OC in the 1970s under the Alaska Native Claims Settlement Act (ANCSA).

5. BASIC SITE INFORMATION:

5.a. Site Name: Blueberry Loop Landfill #3

5.b. Site Address: Blueberry Loop Road, Strawberry Hill, Amaknak Island, Unalaska, AK 99685
(Latitude/Longitude: 53.883833°, -166.540496°)

6. STATUS & HISTORY OF CONTAMINATION AT THE SITE:

6.a. Type of Contamination: Hazardous Substances

6.b. Operational History & Current Use(s): The **Blueberry Loop Landfill Site** is a 25-acre area of the 136-acre **Strawberry Hill Target Area (TA)**, located at the center of Amaknak Island in the Aleutians West Census Tract #02016000200. The site is located upgradient of ***Iliuliuk Lake*** to the north and ***Iliuliuk Harbor*** to the south. The TA is surrounded by residential areas, WWII Museum, and several shipping companies that support the local fishing industry. This area of the Island was used historically as a sheep ranch and work camp until WWII when the military took control of the land and constructed two 1-million-gallon petroleum underground storage tanks (USTs), a water tower, and several WWII structures. In the 1980s, the US Army Corps of Engineers (USACE) created four landfills on Strawberry Hill as part of the WWII Debris Disposal and Site Restoration Project. **The focus for this grant is Blueberry Loop Landfill #3 (the largest of the Blueberry Loop Landfills) where USACE disposed of hazardous debris from demolition of former WWII structures, including ashes from burned buildings, wood, metal, concrete, and asbestos-containing materials (ACM).** Friable asbestos waste was required to be bagged prior to disposal but there is documentation these protocols were not followed and friable ACM was openly dumped into the landfills. The ADEC permit for the landfills specified a four-foot vertical separation between the groundwater table and the bottom of the waste, three feet of cover over the waste, including a 24-inch final cover with established vegetation. It is unknown if the landfills were constructed, operated, and closed in accordance with the issued permit requirements. Furthermore, the landfills were not surveyed to document as-built conditions and records of volume and types of wastes disposed and photographic records were not provided as part of the permit conditions to ADEC. The Blueberry Loop Landfills were closed by USACE in late 1980s and covered with fine-grained clay and sandy silt. There have been no environmental cleanup activities since closure. The ADEC Permit did not require periodic monitoring or inspections, fencing, or hazardous waste signage. These actions may have been satisfactory at the time but do not meet today's standards to be protective of human health and the environment.

6.c. Environmental Concerns: Site characterization activities were completed in May 2025 for the Blueberry Loop Landfills and were completed in October 2024 for the adjacent Strawberry Hill Landfill (SHL) Asbestos Waste Cell – a 1-acre FUDS directly north of Blueberry Loop Landfill #3 (the largest landfill and subject of this grant application).

During the May 2025 investigation, a series of test pits were excavated across each of the three Blueberry Loop Landfills to evaluate the horizontal and vertical limits and types of buried wastes, as well as collect samples for laboratory analyses to characterize waste material and evaluate potential impacts to the surrounding soil. As practicable as possible, samples were collected representative of dissimilar waste material encountered at each landfill. The results of the investigation revealed:

(1.) Stratified waste/fill material was encountered in most of the test pits. The encountered waste represented typical construction and demolition debris comingled with an overburden soil.

(2.) In soil samples collected in Blueberry Loop Landfill #3, concentrations of select metals (predominantly Arsenic and Manganese) were reported in excess of the ADEC cleanup standards, including the ADEC Human Health Standards and the ADEC Migration to Groundwater Standards.

(3.) The encountered waste contained within Blueberry Loop Landfill #3 comprises a surface area of slightly less than one acre and a calculated volume of approximately 20,000 cubic yards (CY).

Investigations prior to the May 2025 event confirmed concentrations of iron, arsenic, and cadmium in surface water (which discharges to Iliuliuk Harbor) exceeding ADEC cleanup levels. Additionally, detectable concentrations of Polycyclic Aromatic Hydrocarbons (PAHs) and metals were found in groundwater as shallow as 5 feet below ground surface. These results create concerns the shallow groundwater table is transporting contaminants downgradient to ***Iliuliuk Lake*** and ***Iliuliuk Harbor*** which are popular fishing locations for locals.

6.d. Nature & Extent of Contamination: The Strawberry Hill TA (where Blueberry Loop Landfill #3 is located) was subject to intensive use by the military during WWII and is impacted by significant "area-wide" contamination concerns (including unexploded ordinance, undocumented waste disposal areas, and widespread impacts to sediment in surface water bodies), as well as contamination associated with individual former military buildings. In the 1980s, the USACE created at least four landfills on the Strawberry Hill to dispose of debris from former WWII structures. Although only one of landfill (the "Strawberry Hill Landfill Asbestos Cell" directly north of Blueberry Loop) was specifically permitted to receive ACM debris, there is documentation that ACM was disposed of in the Blueberry Loop Landfills. As described above in 6.b, friable ACM was improperly disposed of and disposal did not follow the proper protocol of being bagged prior to disposal. In 1986, USACE closed the landfills to further disposal and consequently graded flat and covered with fine-grained clay and sandy silt fill material.

Site investigation activities completed in May 2025 (summarized in above in Part 6.c) included a robust investigation to delineate the vertical and lateral boundaries of Blueberry Loop Landfill #3 and confirm present day levels of contaminants of concern. The groundwater table beneath the landfill is as shallow as five feet below ground surface in some areas and, although previous site investigations determined the contaminants are not impacting the groundwater, there is concern that over time the contaminants will leach into groundwater and be carried offsite and into downgradient ***Iliuliuk Lake*** and ***Iliuliuk Harbor***.

7. BROWNFIELDS SITE DEFINITION:

7.a. National Priorities List Status: The subject property is not listed nor proposed for listing on the National Priorities List.

7.b. Enforcement Action Status: The subject property is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.

7.c. U.S. Government Control: The subject property is not subject to the jurisdiction, custody, or control of the U.S. government. The property was conveyed to OC in the 1970s under the Alaska Native Claims Settlement Act (ANCSA).

8. ENVIRONMENTAL ASSESSMENT REQUIRED FOR CLEANUP GRANT APPLICATIONS: The following site investigation activities have been completed in and around the area of Blueberry Loop:

- 1989 – Site Investigation (Surface water sampled.)

- 1990 – Site Investigation (Site inspection revealed landfill constructed on small stream.)
- 1991 – Site Investigation (Surface water, soil and sediments were sampled.)
- 1994 – Site Investigation (Surface water inspected for discolored discharge.)
- 1997 – Site Investigation (Surface water and sediments were sampled.)
- 1998 – Site Investigation (Surface water, groundwater and soil were sampled.)
- 2024 – Remedial Design Investigation (Landfill debris and soil were sampled. [Analytical results are pending at the time of this grant application.])
- October 2024 – Geophysical Survey.
- May 2025 – LiDAR & Multispectral Survey.
- May 2025 – Phase II Environmental Site Assessment (This field event included test pits and sampling of soils and debris in Blueberry Loop Landfill #3 to delineate the vertical and lateral boundaries of the landfill and contaminants of concern.)

9. SITE CHARACTERIZATION: A response to **Part b** ("for an applicant other than a State of Tribal Environmental Authority") is provided below.

As indicated in the letter provided by ADEC (**Attachment B**), Blueberry Loop Landfill #3 is currently part of their Voluntary Response Program (VRP). The ADEC Contaminated Sites Program (CSP) manages the cleanup of contaminated soil and groundwater at sites across Alaska. With the exception of sites being cleaned up under a compliance or enforcement agreement, sites addressed through CSP are considered to be within ADEC's VRP. This designation includes Blueberry Loop Landfill #3. As stated in their letter, ADEC confirms sufficient characterization of the site has been completed for the remediation work to begin.

10. ENFORCEMENT OR OTHER ACTIONS: No enforcement actions are known or anticipated for the Blueberry Loop Landfills. There have been no inquiries, or orders from federal, state or local government entities that OC is aware of regarding the responsibility of any party (including the applicant) for the hazardous substances at the site. Additionally, there are no environmental liens.

11. SITES REQUIRING A PROPERTY-SPECIFIC DETERMINATION: None of the special classes of property that require a property-specific determination in order to be eligible for funding apply to the Blueberry Loop Landfills.

12. THRESHOLD CRITERIA RELATED TO CERCLA/PETROLEUM LIABILITY:

12.a. Property Ownership Eligibility – Hazardous Substance Sites: The contaminants of concern are hazardous substances. Responses to **Part i** are provided below.

i. EXEMPTIONS TO CERCLA LIABILITY: Responses to **Part (2)** are provided below.

(2) Alaska Native Village Corporations & Alaska Native Regional Corporations.

OC is an Alaska Native Village Corporation (ANVC). OC was conveyed title to property in the 1970s by the US Government under the Alaska Native Claims Settlement Act (ANCSA) and is therefore excluded from the CERCLA definition of "owner/operator." Although OC was conveyed the property in the 1970s, the US Government maintained control of the site through the 1980s. OC did not cause or contribute to the contamination or release of hazardous substances and is therefore exempt from CERCLA liability for any previous contamination of the property. Below we provide the additional information requested.

(a) Circumstances of Acquisition: OC was conveyed title to property in 1975 from the US Government under ANCSA. A copy of the conveyance document is provided as **Attachment C**.

(b) Date of Acquisition: September 8, 1975

(c) Release of Hazardous Substances: OC has never caused nor contributed to contamination or release of hazardous substances at the site. Although the site was conveyed to OC in the 1970s, it continued to be under the control of the US Government through the 1980s as indicated by the actions of USACE to create the waste landfills. USACE closed the landfill in 1986. The site has remained idle since that time.

A letter from ADEC confirming contamination also existed prior to conveyance is provided as **Attachment D**.

ii. EXEMPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY: Not applicable.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY: Not applicable.

12.b. Property Ownership Eligibility – Petroleum Sites: Not applicable.

13. CLEANUP AUTHORITY & OVERSIGHT STRUCTURE:

13.a. Description of Cleanup Oversight Structure: OC will hire a Qualified Environmental Professional (QEP) to oversee cleanup activities. ADEC oversees all environmental remediation projects. Removal of hazardous waste will be completed under EPA and ADEC oversight. As described under Part 9 above, the site is currently part of ADEC's Voluntary Response Program (VRP). OC and its QEP will work closely with EPA and ADEC to ensure cleanup is protective of human health and the environment. OC will procure a QEP and remediation contractor in accordance with the competitive procurement provisions of 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.

13.b. Impact of Cleanup Response Activities on Adjacent & Neighboring Properties: Blueberry Loop Landfill #3 is located within a 25-acre area of the 136-acre hill known as Strawberry Hill. OC owns all the land within Strawberry Hill. Therefore, access to neighboring or adjacent properties that may be required as part of cleanup activities will not be an issue.

14. COMMUNITY NOTIFICATION: OC provided the community with notice of its intent to apply for an EPA Brownfield Cleanup Grant and provided the community an opportunity to comment on the draft grant application package, including the draft ABCA. Community notification details are provided below.

14.a. Draft Analysis of Brownfield Cleanup Alternatives: A draft ABCA summarizing the following information was prepared: (1.) the Property and contamination issues, cleanup standards, and applicable laws; (2.) the cleanup alternatives considered (including information on the effectiveness, the ability of OC to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness); and (3.) the proposed cleanup. A copy of the draft ABCA is provided as **Attachment E**.

14.b. Community Notification Ad: A community notification ad (provided at **Attachment F**) was published on OC's Facebook page on January 8, 2026. Printed notices were posted at the locations below on January 8, 2026. As required by EPA, these activities were completed at least 14 days prior to submittal of this grant application.

- City Hall
- U.S. Postal Service Offices
- Unalaska Public Library

The ad indicated the following:

- a copy of this grant application, including the draft ABCA, was available for public review and comment;
- how to comment on the draft application;
- where the draft application was located; and
- the date, time and location of the public meeting.

14.c. Public Meeting: OC presented its draft application at a community meeting open to the public. The meeting was held on January 23, 2026 and included 13 virtual attendees (via Microsoft Teams).

14.d. Submission of Community Notification Documents:

The following community notification documents are attached as indicated below.

- Draft ABCA – Attachment E
- Community Notification Ads – Attachment F
- Summary of Comments Received – Not applicable. (No comments were received.)
- Response to Public Comments – Not applicable. (No comments were received.)

- Public Meeting Notes – Attachment G
- Meeting Participant List – Attachment H

15. CONTRACTORS & NAMED SUBRECIPIENTS:

15.a. Contractors: Not Applicable. A contractor will be procured upon grant award. OC will comply with all applicable procurement standards, including 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.

15.b. Named Subrecipients: Not Applicable. No subrecipients are named nor are any anticipated.

THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Environmental Conservation

SPILL PREVENTION & RESPONSE
Contaminated Sites Program
PO BOX 111800
Juneau, AK 99811
Main: 907.451.2185
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www.dec.alaska.gov

January 27, 2026

Natalie Cale, CEO
Ounalashka Corporation
P.O. Box 149
400 Salmon Way
Unalaska, Alaska 99685

RE: **State Environmental Authority Letter & Site Eligibility Confirmation for Blueberry Loop Landfill #3 (located at Strawberry Hill, Amaknak Island, Unalaska, AK 99685)**

Dear Ms. Cale,

This letter acknowledges that the Ounalashka Corporation notified the Alaska Department of Environmental Conservation (DEC), the designated State Environmental Authority, that it will be submitting a Fiscal Year 2026 EPA Brownfield Cleanup Grant application to the U.S. Environmental Protection Agency. The Ounalashka Corporation has developed an application requesting site-specific federal Brownfields Cleanup funding for the Blueberry Loop Landfill #3 located on Blueberry Loop Road at Strawberry Hill, Amaknak Island in Unalaska, Alaska.

The DEC Brownfields Program is committed to assisting Alaska communities in their efforts to address brownfield properties. This proposal is a positive and necessary step in addressing brownfields within the Unalaska community. The Ounalashka Corporation is focused on cleanup of the Blueberry Loop Landfills, which contains asbestos-containing material (ACM) and other hazardous substances. Receiving a cleanup grant from EPA would greatly assist with addressing this site and preparing the property for the planned reuse as an essential regional hospital and affordable housing development.

Per EPA's FY26 Guidelines for Brownfield Cleanup Grants, this letter establishes that this site is eligible to be overseen by DEC's voluntary response program and the Ounalashka Corporation has requested State oversight of the subject property. The DEC Contaminated Sites Program (CSP) manages the cleanup of contaminated soil and groundwater at sites across Alaska.

The Ounalashka Corporation has previously applied for and was awarded (1) site-specific funding through the EPA Contaminated ANCSA Lands Assistance Agreement funding to conduct an investigation and removal action of polychlorinated biphenyl (PCB) contaminated soils at a World War II Building site in Unalaska; (2) an EPA Brownfield Community-Wide Assessment Grant for States and Tribes (CWAGST); and (3) an EPA Brownfield Cleanup Grant for the Strawberry Hill Landfill Asbestos Cell. Throughout these interactions, DEC can confirm the Ounalashka

Corporation to be an involved and active partner as a part of efforts to clean up the site in preparation for its planned reuse. In addition, the Ounalashka Corporation is actively engaged in addressing other contaminated sites in their community and coordinating with DEC on their assessment and cleanup.

EPA Brownfield Cleanup Grant applications also require a statement from an environmental professional certifying that a sufficient level of site characterization has previously been performed for the remediation work to begin on the site. The Blueberry Loop Landfill 3 was used to dispose of construction waste and debris generated from the Corps of Engineers World War II Debris Disposal and Site Restoration Project. Debris reportedly consisted of ashes, wood, metal, concrete building material, miscellaneous metal debris, and ACM. A comprehensive Phase I ESA was completed for all of Strawberry Hill in 2023 and provided information in guiding a geophysical survey of the area to confirm the locations of the landfills, identify additional anomalies requiring further investigation in September and October 2024, and provide estimated volume of the landfill. A Supplemental Remedial Investigation Work Plan was approved for Ounalashka Corporations contractor for fieldwork in May, 2025. This work plan included fourteen test pits in and around Blueberry Loop Landfill #3, further delineating the nature of the debris within and confirming the boundaries of the site. Analytic soil sampling also occurred at each test pit for volatiles, semi volatiles, total petroleum hydrocarbons, PCBs, pesticides, total metals, and forms of chromium. Analytical samples confirm the presence of benzene, arsenic, and manganese above DEC 18 AAC 75 Table B1 Migration to Groundwater levels. DEC is satisfied that the horizontal and vertical extent of the site has been delineated. Altogether, the characterization of Blueberry Loop Landfill #3 has been very thorough, and DEC believes that the site has been fully characterized. DEC will continue to work with the Ounalashka Corporation to ensure that the remediation work proceeds on schedule.

This letter establishes the Ounalashka Corporation's compliance with the requirements for an EPA Brownfield Cleanup Grant. We wish the Ounalashka Corporation well in its pursuit of EPA assistance and success in addressing the Blueberry Loop Landfills site. Please contact me with any further comments or questions at kathleen.iler-galau@alaska.gov or (907) 451-2185.

Sincerely,

Kathleen Iler-Galau
ADEC Environmental Specialist

Electronic cc: Marc Thomas, ADEC
Flannery Ballard, DEC
Julie Fix, ADEC
Terri Griffith, U.S. EPA
Madison Sanders-Curry, EPA