



# Saint Regis Mohawk Tribe

Chief Beverly Cook  
Chief Ron LaFrance Jr.  
Chief Eric Thompson  
Sub-Chief Shelley Jacobs  
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December 16, 2015

R02-16-A-018

USEPA Brownfields Program  
c/o Environmental Management Support,  
Inc. 8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910  
Phone 301-589-5318

She:kon/Greetings U.S. EPA Brownfields Program:

This shall serve as the Transmittal letter for the Saint Regis Mohawk Tribe's Brownfields Community-wide Petroleum Assessment proposal. As specified in your proposal guidelines, we are providing the following information:

- a. Applicant Information: Saint Regis Mohawk Tribe, Environment Division, Saint Regis Mohawk Tribe 412 State Route 37, Akwesasne, NY 13655
- b. DUNS number: 79-781-6647
- c. Funding Request: i) Grant Type: Assessment; ii) Federal Funds Requested: \$200,000; iii) Contamination: Petroleum Substances; iv) Community Wide
- d. Location: Saint Regis Mohawk Reservation, Franklin County, New York
- e. Site specific proposal: not applicable
- f. Contacts: i) Project Director: Ken Jock, fax # 518-358-6252 & phone number 518-358-5937, e-mail: [ken.jock@srmt-nsn.gov](mailto:ken.jock@srmt-nsn.gov), ii) Chief Executives: Tribal Chief Beverly Cook, Chief Ron LaFrance, Jr., Chief Eric Thompson
- g. Date Submitted: December 18, 2015
- h. Project Period: October 1, 2016 – September 30, 2019
- i. Population of Service Area: Tribe population is 12,400; tribal members inhabiting reservation is 12,400;
- j. Special Consideration Checklist: Attached as Appendix 3

Saint Regis Mohawk Tribe (SRMT) is excited by the prospect of continuing our Brownfields work that was initiated in 2010 through our 128(a) Brownfield contract. In support of our grant request, SRMT has outlined the following:

- SRMT has identified 398 Brownfield sites on the Saint Regis Mohawk Reservation;
- The needs for the communities in which our target sites are located include: improved health, community water supply protection, job creation, and preservation of natural resources vital to our culture and livelihood; and

- Although we do have a 128 (a) Tribal Response Grant, that funding is dedicated to address our four elements and the assessment and remediation of the Frogtown dump site. This grant funding will be dedicated to address our many identified petroleum sites. SRMT anticipates 80% of the grant funds will be for petroleum site assessments and cleanup planning.

**Project Overview:** We look forward to utilizing the 104(k) grant funding to generate new jobs, protect the health of our residents that currently reside in and near former gasoline stations, ensure former gasoline stations are not negatively impacting surface water bodies and wetlands vital to our livelihood and culture, protecting our community water supply, and improving health by reducing or eliminating exposure to contaminants. This application builds on the work initiated by our 2010 128 (a) Tribal Response Grant and will allow us to obtain funding to address the numerous petroleum sites that have been identified.

**Brief Description of the Service Area:** The Saint Regis Mohawk Reservation is located in Northern New York State approximately eighty miles northeast of Lake Ontario and sixty miles southwest of Montreal, Quebec. The reservation lands are divided by the United States and Canadian Border and subdivided by Franklin County in New York and the Provinces of Ontario and Quebec. This grant will only be used to address our land based in the United States.

Unlike most municipalities, SRMT does not have a property tax base for generating revenue to support public services such as education, health, housing, and other assistance programs. The limited federal funding (93-638) is not sufficient to meet the current needs of the community.

As a low-income minority, this grant will assist in our continuation of overcoming potential environmental justice and disproportionate disparities associated with Brownfield sites.

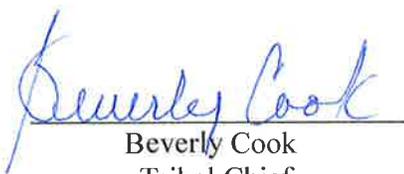
SRMT has recently been identified as a "Making a Visible Difference Community" by the EPA. SRMT was one of two communities identified in New York State that has been recognized to be an "environmentally overburdened, underserved, and economically distressed area where the needs are greatest."

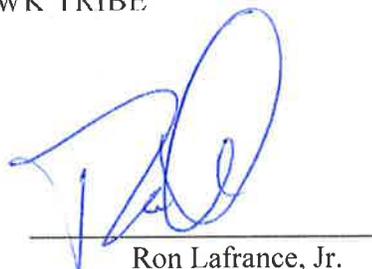
SRMT has also entered into its third Performance Partnership Agreement (PPA) with the USEPA, Region 2. The PPA memorializes the long-standing relationship between SRMT and USEPA to address environmental priorities of mutual concern. The official signing of the SRMT and USEPA Region 2 PPA for 2016-2020 occurred on December 8th, 2015.

If you should have any questions, please contact Mr. Ken Jock at 518.358.5937 or [ken.jock@srmt-nsn.gov](mailto:ken.jock@srmt-nsn.gov).

THE SAINT REGIS MOHAWK TRIBE

Sken:nen/Peace,

  
Beverly Cook  
Tribal Chief

  
Ron Lafrance, Jr.  
Tribal Chief

  
Eric Thompson  
Tribal Chief

**APPENDIX 3**

**REGIONAL PRIORITIES FORM/OTHER FACTORS CHECKLIST**

### Appendix 3 Regional Priorities Form/Other Factors Checklist

Name of Applicant: Saint Regis Mohawk Tribe

#### Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.E, please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Assistance to Communities That Have Limited In-House Capacity to manage Brownfields Projects and Climate Change Resiliency

Page Number(s): For 1<sup>st</sup> listed Priority Pages #1 and 2 For 2<sup>nd</sup> listed Priority Page #13

#### Assessment Other Factors Checklist

Please identify (with an **x**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	<b>X Page 1</b>
Targeted brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	<b>X Page 10</b>
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	<b>X Page 10</b>
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	<b>X Page 5</b>

<p>Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, <b>applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation</b> which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.</p>	
<p>Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, <b>applicant must attach documentation.</b></p>	
<p>Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.</p>	

## ***1.COMMUNITY NEED***

### ***1.a.Targeted Community & Brownfields, 1.a. i. Targeted Community Description***

The Saint Regis Mohawk Tribe (SRMT) consists of original natives of New York (NY) and Canada and is a federally recognized Indian Tribe (population 12,400). The reservation lands are located geographically in both the United States (US) and Canada. Funding from this grant will only be utilized on the US portion of the reservation lands. The US portion of the SRMT reservation land is located in Franklin County, New York. For the purposes of this grant, the term reservation means the geographical portion of the SRMT's land located in the US. The land is traditionally known to the Mohawk people as Ahkwesáhsne (Land Where the Partridge Drums), it is approximately 16,640 square acres of wetland, agricultural land, and woodland that houses light commercial development and residential properties. The Mohawk/Kanien'kehá:ka Nation is part of the Haudenosaunee (Iroquois) Confederacy. The portion of the SRMT Reservation located in the US is situated on the western side of Franklin County and abuts Saint Lawrence County on the northern end of the county line. These two counties are among the poorest in New York. The reservation is bordered to the north by the St. Lawrence River. For thousands of years, we have relied on the rivers and wetlands for food, drinking water, transportation, medicinal plants, and plants for making crafts and baskets. We continue to use the land and water for hunting, fishing, trapping, food gathering, boating, and ceremonial purposes. The river and wetlands are our very soul, a place where we truly hold hands with our history and our ancestors.

In 1958 the Seaway International Bridge was opened which connected the Canadian city of Cornwall (population, 47,000) to the US, adjacent to our Reservation lands. This allowed easy access to the Reservation from a large Canadian population. Since gas prices are, on average, 50 % cheaper in the US after factoring in the exchange rate ([www.gasbuddy.com](http://www.gasbuddy.com)), a large number of tribally-owned gasoline stations opened on the Reservation to accommodate this influx of new customers. Approximately 30 percent of all of our customers are Canadian (Taylor, Economic Impact of the Saint Regis Mohawk Tribe, 2008). The Reservation's gasoline station petroleum storage tanks are not regulated by New York State and the underground storage tanks (USTs), above ground storage tanks (ASTs) and associated piping are not subject to removal deadlines. Therefore, many stations eventually closed and the tanks and piping were never removed. We are now plagued with numerous abandoned ASTs, USTs and associated piping that may be leaking harmful pollutants into our soil, groundwater, and precious surface waters. In addition, several of these former gas stations have now been converted to residences or are located in residential areas. Many of our most sensitive residents live in these sites and the surrounding residences. The ASTS, USTs, piping and potential petroleum-impacts, however, remain. Our target areas are abandoned gas station sites located on both the North and South sides of State Route 37, which is the main road that runs through the center of the Reservation and is approximately 11 miles long.

Sensitive populations within our tribe include the elderly, disabled, pregnant women, children, and low income families with limited access to affordable health care. Funding to investigate these Brownfields will enable us to identify human health and environmental concerns. This may lead to additional funding to clean-up these Brownfields. We have no other funding to complete this important task which is imperative to the health of these sensitive populations and the general tribal population that are all affected by environmental impacts.

**Our needs include jobs, safe and clean residences, a clean drinking water supply, support of our cultural heritage, and clean surface water bodies and wetlands that are vital to our livelihood and culture.**

*1.a.ii. Demographic Information*

Demographic	SRM Tribe	Franklin County	New York	USA
Population (2013 estimate) <sup>1</sup>	3,240 <sup>1</sup>	51,676 <sup>1</sup>	19,487,053 <sup>1</sup>	311,536,594 <sup>1</sup>
Median Age	37 <sup>1</sup>	39.6 <sup>1</sup>	38.1 <sup>1</sup>	37.3 <sup>1</sup>
Median Household Income	30,424 <sup>1</sup>	45,667 <sup>1</sup>	58,003 <sup>1</sup>	\$53,046 <sup>1</sup>
Minority % <sup>1</sup>	95% <sup>1</sup>	16% <sup>1</sup>	34% <sup>1</sup>	36.7% <sup>1</sup>
% Below Poverty <sup>1</sup>	37.9% <sup>1</sup>	19.2% <sup>1</sup>	15.3% <sup>1</sup>	11.3% <sup>1</sup>
Unemployment (2014 & or 2015)	15%*2014	7.3% <sup>2</sup> 2014	4.8% <sup>2</sup> 2015	5.3.% <sup>2</sup> 2015
<small>*-Data provided by the Tribal Government Census Department, 2012; <sup>1</sup>-2013 American Community Survey; <a href="http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#none">http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#none</a> <sup>2</sup>-Data are from the Bureau of Labor Statistics and is available at <a href="http://www.bls.gov">www.bls.gov</a></small>				

*Note: Most members of SRMT refuse to participate in US Census data surveys; our own records indicate a population of 12,400.*

The SRMT is a low-income minority community that has always faced high rates of unemployment as compared to the county, state, and country as well as low household income with many homes below the poverty level.

*1.a.iii. Brownfields*

SRMT has identified 398 Brownfields within our community ranging from <1 to 50 acres. We have identified 8 petroleum sites that we believe have abandoned USTs and/or ASTs and associated piping remaining in the ground. These facilities are either currently releasing petroleum to the environment or will do so in the future if ignored. Petroleum in groundwater is a concern to humans because it may contain benzene toluene and xylenes which are toxic to humans and benzene is a carcinogen. Petroleum in surface water is toxic to aquatic organisms including fish, affecting reproduction and viability. Other compounds associated with petroleum include poly aromatic hydrocarbons (PAH). PAH contain carcinogens and affects organs such as the liver. Chemicals of concern include benzene, toluene, xylenes, Poly aromatic hydrocarbons, naphthalenes, mineral spirits and chlorinated solvents such as carbon tetrachloride. Previous Underground Storage Tank (UST) leakage included tetra-ethyl lead, an anti-knock agent blended into gasoline to prevent pre-ignition. The lead component seriously affects the central nervous system development in children and therefore was phased out in the 1970's. Several of these former sites are near rivers and several others are now located in residential areas. Benzene, toluene, ethylbenzene, and xylenes (BTEX) in Akwesasne, associated with USTs ranged from 5.4 to 10,560 parts per billion (ppb) in monitoring wells. General descriptions of the three types of petroleum sites we are dealing with are described below. Abandoned Marinas: A former marina which is less than one acre in size is located on Pumphouse Road and is within 1,000 feet of the Reservation's water supply. The former marina is currently abandoned and contains an earthen dock that protrudes into the St. Lawrence River. This site, like so many sites on the Reservation, contains USTs, ASTs, and piping that were never removed although the facility has been abandoned for many years. The former marina currently acts as a water access point for small boats and provides an ideal location for fishing and swimming. Our Brownfields Program believes that this would make an ideal location for a public boat access and recreational area for

the community. There is a concern, however, that residual petroleum contamination including (BTEX), naphthalene, and other polycyclic aromatic hydrocarbons (PAHs) may have migrated to the groundwater, river sediments, and surface water. These concerns are significant since the community water supply for the entire reservation is nearby. There have been no reports of sheens on the surface water, but there is a threat that petroleum may be present in the USTs and piping which are currently being released or will be released to the environment in the future. No data about the current status of our waterways is available. Some petroleum hydrocarbons in waterways will float and cause surface films and some will sink to bottom sediments. Surface films will impact aquatic organisms, some being directly lethal, some disrupting physiology and behavior, coating and some entering the food chain. The SRMT would like to assess the site to determine the environmental risks to the environment and the Tribe's water supply prior to dedicating funding to redevelop the site into a recreational area. There are two additional similar abandoned marinas in our Brownfields database. Suspected Former Gas Stations: A suspected former gasoline station is located on Route 37 approximately 900 feet from the Raquette River. The site is now operated as a car repair facility and car junkyard occupying 4.8 acres. As with the other sites there is a fear that there are potential abandoned USTs, ASTs and associated piping whose contents may have impacted or will impact in the future, the subsurface soils and groundwater. No investigations of the area or the adjacent river bank have been conducted and no signs of the former gas station are immediately evident but local residents have identified the location as a historic gas station. The area supports a commercial property and the river serves as a fishing, recreational, and cultural area. Current owners, residents, and the St. Regis Mohawk Tribe are concerned about the potential harms from releases of petroleum into the environment and to the health of workers. There are three sites, similar to the one described above, in our Brownfields database that we suspect of being former gas stations, but need to gather more information to be certain.

Former Gas Stations with residential concerns: A former gasoline station that is being used as a residence on Route 37 on the reservation also has ASTs, USTs and associated piping that have been abandoned for many years. The site is approximately 1 acre in size and is 500 feet east of the St. Regis River. The site and adjacent river bank have never been investigated to determine if petroleum impacts are present. This site is surrounded on three sides by commercial businesses with residential property directly north. Although there have been no known complaints of odors within the residence, they are living on top of an environmental concern. If the ASTs and USTs are not currently releasing petroleum to the environment, they will eventually fail causing petroleum vapor migration intrude into the building's basement and interior space. There is currently no indoor air quality data available. Vapor intrusion from contaminated soils into a home is a possibility. Low level chemical exposures may raise a person's lifetime risk for developing cancer. Sensitive human receptors to vapor intrusion include children, the elderly and people with asthma and lowered immunity. Known carcinogens; benzene, toluene and xylene have been found to cause cancer in high concentrations in animals. PAH are potential carcinogens in humans shown to increase lung, skin and bladder cancer incidences for exposed workers. There may also have been car repair completed at this site where the use of chlorinated solvents is suspected. The residents would like to have the assurance that their health is not being compromised. Additionally, the SRMT would like to evaluate if this site has or is impacting the river. It is suspected that some residual petroleum remains within the tanks. The river currently serves as a recreational, fishing, and cultural resource. There are three former gas

stations, similar to the one described above with residential redevelopments or neighbors, in our Brownfields database.

1.a.iv. Cumulative Environmental Issues

We are not aware of any other community or Tribe in the US that has been as affected by environmental pollution as the SRMT. Our lands are within the USEPA designated St. Lawrence River at Massena Area of Concern. Directly up river from our lands is the General Motors, Alcoa, and previous Reynolds Metals Superfund Sites. The General Motors site actually abuts a portion of our land. Each of these sites has significantly impacted our health, our waterways, our fish, our turtles, our land, our animals, our environment, and quality of life. We have been contaminated with PCBs, volatile organic compounds (VOCs), metals including high concentrations of mercury, 1,1-dichloro-2,2-bis(p-chlorophenyl) ethylene (DDE) which is a breakdown product of DDT, Mirex, and semi-volatile organic compounds (SVOCs). They contaminated our air and lands with hydrogen fluoride, polycyclic organic matter, dioxins/furans, PCBs, and other airborne contaminants.

Three USEPA sponsored studies concluded that the human health risks for the SRMT population from the consumption of PCB contaminated fish are greater than those of anglers on other major New York State water bodies. SRMT risks are larger primarily because the average PCB levels in the St. Lawrence River fish are higher and the fish consumption is greater. According to the “2013 Akwesasne Family Guide to Eating Locally-Caught Fish” there are currently 2 species of fish in Akwesasne that are considered too contaminated by PCBs and mercury for consumption, 6 species of fish with moderate contamination risk with a consumption advisory of 1 portion per month, and 8 species of fish with a consumption advisory of up to 4 portions per month. The impacts of the Superfund and other industrial sites have seeped into almost every facet of our life and their effect on our cultural heritage and quality of life cannot be overstated. “Akwesasne is a potential candidate for designation as an Environmental Justice Community (EJC) by the U.S. EPA because of elevated PCB levels in adjacent lands and traversing waterways, and the potential for inhalation exposure from volatized PCB particulates (Schell, Lawrence M. et al. “Health Disparities and Toxicant Exposure of Akwesasne Mohawk Young Adults: A Partnership Approach to Research.” *Environmental Health Perspectives* 113.12 (2005): 1826–1832. *PMC*. Web. 7 Dec. 2015)

1.b. Impacts on Targeted Community

Health Concerns	SRM Tribe*	Franklin County	New York	USA
Diabetes (Adult) <sup>1</sup>	12.0 %	6.2 %	6.1 %	8.7 %
Obesity (Adult) <sup>1</sup>	10.0 %	36.5 %	24.5 %	27.8 %
Asthma (Adult)	22.0 %	10.7 % <sup>1</sup>	9.7 % <sup>3</sup>	8.9 % <sup>1</sup>
Asthma (Children) <sup>1</sup>	0.9 %	9.5 % <sup>1</sup>	10.4 % <sup>3</sup>	NA
All Cancer Death Rate	No Data	203.4 <sup>1,4</sup>	168.4 <sup>1,4</sup>	176.4 <sup>2,4</sup>
Breast Cancer Incidence Female <sup>1</sup>	0.02 %	104.8 <sup>4</sup>	128.6 <sup>4</sup>	123.8
Incidence Lung Cancer Male <sup>1</sup>	0.002 %	92.8 <sup>4</sup>	75.5 <sup>4</sup>	61.4
Coronary Heart Disease Deaths <sup>1</sup>	No Data	206.6 <sup>1,4</sup>	191.1 <sup>4</sup>	244.8 <sup>3,4</sup> (2008)

\*- Health Center Statistics for Tribe Members attending SRMT Indian Health Services <sup>1</sup>-NY State Dept. of Health (2012), <sup>2</sup>-National Cancer Institute, Surveillance, Epidemiology, & End Results (SEER) Program; <sup>3</sup>NY State Asthma Surveillance Summary Report 2013; <sup>4</sup> per 100,000 persons

Health- Tribal health statistics are limited to those that seek services at the SRMT Indian Health Services facility. Therefore, the statistics do not fully represent the health impacts for the entire population. Some tribal members choose to attend medical facilities outside of the Reservation or prefer holistic methods. If visits to non-tribal facilities were also charted, our reported statistics would be substantially worse. A cursory view of our population reveals that we have been significantly affected by industrial contaminants released by the businesses that now are designated as Superfund and Brownfields Sites. Demographics for SRMT indicate asthma, diabetes, and cancer rates much higher than the state, county, and national averages. Particularly troubling is the difference between our population and the rest of Franklin County. The majority of Franklin County is not directly affected by the Superfund Sites. Wind and water currents from these Superfund sites are directly up gradient from our reservation, but do not significantly impact the central and southern portions of Franklin County where the majority of the population resides.

The following data is provided by Federal Funding and Unmet Needs in Indian Country: Diabetes is disproportionately prevalent in Alaska Indian and American Indian (AIAN) communities. AIAN women are 70% more likely than White women to be obese. Native American adults are more than three times as likely to have diabetes compared with the U.S. population in general. AIAN are 30% more likely to be diagnosed with asthma; AIAN adults are 1.3 times as likely as White adults to have high blood pressure; chronic liver disease was the fifth leading cause of death for all AIAN men; and American Indian Women are 1.7 times as likely to die from cervical cancer as compared to white women. Potential contaminants at Brownfield sites could be identified as carcinogens directly effecting cancer rates.

Welfare- According to the Harvard Project on American Indian Economic Development (2008), AIAN have been the poorest minority readily identifiable in the census decade after decade, and conditions on the reservations have been even worse with a national poverty rate of 39 %. Our poverty rate is slightly better than this national rate at 32.4 %. This is due to the 1985 opening of our Bingo Palace and the 1999 opening of our Akwesasne Mohawk Casino. These businesses employ a large number of our tribal members, but despite these successful businesses, we still maintain a high unemployment and poverty rates. Brownfields sites contribute to overall poor welfare in Akwesasne through limiting economic development opportunities.

The loss of native Indian culture is one factor contributing to our community's social problems, especially those associated with alcohol. According the Indian Health Services, the rate of alcoholism among Native Americans is six times the US average. According to the Center for Disease Control, almost 12 percent of the deaths among AIAN are alcohol-related. Brownfields sites contribute to overall loss of culture in Akwesasne through contamination of the natural resources that are used in traditional practices such as basketmaking, hunting, trapping, fishing, and medicinal plant usage.

#### 1.c. Financial Need 1.c.i. Economic Conditions

Some of the hardships contributing to less than desirable economics that necessitate our need for this funding include:

- In 2009 the General Motors Powertrain plant located in Massena, NY and directly abutting the Reservation, filed for bankruptcy and ultimately closed its doors. Although the shutdown is beneficial to our environmental goals, the local economy has been severely impacted by the loss of 500 jobs, of which 3% were held by Tribal members.

- In 2014 the Alcoa Aluminum Potliner East plant located in Massena, NY and approximately 1 mile west of the Reservation, closed its doors. Our economy was again negatively impacted by the loss of 334 jobs at this factory, of which 2% were held by Tribal members.
- In November 2015, Alcoa West plant announced that it would be closing its doors within the next 3 years, laying off 500 employees, of which 4% are held by Tribal members.
- The local mall, St. Lawrence Centre, in Massena was heavily affected by these closings and in turn closed more than 40% of its stores and food vendors, including all of its major anchor stores, losing more jobs which were also held by Tribal members (exact numbers unknown).
- The large decline in jobs has affected the Tribal community in many ways including the closing of First Nations IGA, a large tribally owned grocery store in 2012.
- Since 2009, the Tribal community has closed many restaurants, gift shops, cigarette factories, and gas stations, attributing to a further decline in available jobs (exact numbers unknown) and an increase in abandoned commercial buildings (Brownfields database contains 130 abandoned commercial buildings)
- The local economy has also experienced a 30% decline in Canadian customers due to the continued weakening of the Canadian dollar which currently stands at \$0.75 US (Watertown Daily Times Article “Vacancy Rates a Constant Battle for Shopping Malls, April 2015).

The location of the Saint Regis Mohawk Tribe along the St. Lawrence River and nestled between the Grasse, Raquette, and Salmon Rivers, make it prone to many instances of flooding and ice damage events throughout the year. Depending on the rate of rainfall, Tribal emergency services may need to respond to as many as 50 flooding situations in one month and as many as 4 large ice jam events throughout the winter and spring months that may cause property damage and threaten health and safety of homes along the water (HAVFD database). In 1998, a catastrophic natural disaster known as the “Ice Storm” left the community covered in several inches of solid ice, no electricity for three weeks, susceptible to buildings collapsing under the weight of ice and water, and threatened by severe flooding. Although a state of emergency was declared for the area, a request for FEMA funding from Tribal emergency services was declined without review in favor of funding utility companies (<http://www.akwesasne.ca/node/277>).

SRMT currently has a number of financial commitments that further limit financial resources to conduct these assessments. In short, we do not have money to address these petroleum impacted sites ESAs and our 128 (a) funding is already committed to addressing our response program and the Frogtown dump site.

#### *1.c.ii. Economic Effects of Brownfields*

Environmental justice and disproportionate disparities are concerns due to our status as a low-income minority. SRMT suffers emotionally, physically, and economically from Brownfields contributing blight, poverty, devaluation of property, discouragement of investment, unemployment, health issues, and attraction to vandalism. These Brownfields sites contribute to the health issues that plague our community such as asthma, cancer, diabetes, and obesity (see table 1.b Impacts on Targeted Community). Maintaining cultural practices, promoting native crafts, and protecting the resources to support those crafts are vital to our native heritage and therefore the Tribes identity and well-being. Resolving health issues results in a more productive

population. Improving SRMT's economy can generate a momentum that increases business, income, building renovations, and general morale. The former gasoline and current car parts junkyard on Route 37 is an example of prime commercial real estate not being maintained, causing blight, and not generating significant revenue in a business district.

SRMT's unemployment rate is currently at a staggering 15%. The data also does not distinguish between full and part-time employment which is important to note since agriculture related jobs, such as farm hands and crop pickers, are usually seasonal. Employment for Tribal members is primarily supporting public services located on the Reservation and at the casino. There is limited revenue generating opportunities in place for the Tribal members. Assessments and redevelopment at the target sites will generate craft production and retail jobs on the reservation and promote pride in our culture.

Many tribal members perform cultural activities that are vital to sustaining our traditional Mohawk knowledge and identity. Cultural activities that are dependent on the natural environment include building dugout canoes, making black ash tree baskets, snowshoes, moccasins, brain tanned leather, medicinal plant harvesting, hunting and trapping. One main goal of the SRMT Brownfields Program is to protect the natural resources in our area that carry a significance to our culture. The reduction or elimination of these natural resources through impacts from Brownfields negatively affects SRMT's historical culture, livelihood, and overall lifestyle.

## 2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

### 2.a. Project Description 2.a.i. Project Description

The project will first identify the former gasoline station sites to be evaluated through additional public outreach. The sites with the highest probability of redevelopment that meet the needs of our tribal community will be addressed first. Our community needs are jobs, ensuring clean and safe surface water bodies, drinking water, and wetlands that are vital to our cultural heritage, providing recreational access through additional greenspace, and ensuring safe indoor air quality for our residences and businesses. Once sites are selected we will then submit eligibility determinations and obtain owner access agreements. Our initial public outreach indicates that the site owners are eager to participate in the program.

We anticipate that we will not be able to investigate all of the former gasoline service stations with this grant. The sites will be ranked and the most important sites will be evaluated using Phase I Environmental Site Assessments (ESAs) and geophysical surveys to look for USTs and piping. Sites where USTs are discovered or impacts are identified during the Phase I ESAs, will continue to Phase II ESAs.

One site which is presumed to be selected is the former marina site located approximately 1,000 feet from our community water supply source. The marina is also an ideal access point for recreational activities and fishing. This site is in the most environmentally sensitive area of the reservation. If, in the event contamination is found, we will divert tribal funding to address the impacts. Our goal, once we have determined this area to be clean according to NY State standards, is to provide tribal funding to better construct water access and supply amenities to create a recreational greenspace for our tribal members. We would like to create a paved parking area with sufficient storm water controls for parked cars that would limit the potential for vehicle fluids to be discharged into the ground which is near our water source. We anticipate the parking area will allow several cars with boat trailers as well as approximately ten additional cars for park users and shore fishermen.

SRMT has a comprehensive economic development strategy (CEDS). The goal of the CEDS is to evaluate tribal population and demographics and learn about current tribal economic activity and needs. Our best location for creating successful businesses is on Route 37 in the general vicinity of the former gasoline station and junkyard. Development for this area has been hampered by the perception that the former gasoline station has impacted the soils and groundwater at this site. The site is large with approximately over 4 acres that could be redeveloped with a new business. Once the investigation is complete and we assume that the site will be cleared from its negative perception, we hope to find a new business to occupy this prominent space. Preliminary talks have focused on the need to create a business to sell native art and crafts and promote cultural tourism.

Several of our former gasoline stations are currently being utilized as residences and many of them are very close to surface water bodies where we fish and harvest native plants. One of these is on Route 37 where this 1 acre site is 275 feet east of the St. Regis River. Our need is to ensure that these residential properties do not have completed exposure pathways that impact our residents or are sitting on ticking time bombs waiting for the old steel USTs to fail. We will evaluate indoor air quality and the vertical and horizontal extent of petroleum impacts to soil, river sediments, and ground water that migrates to the surface water. We will address documented USTs, piping, or health impacts using an anticipated clean up grant. We need to ensure that these residences and surface water bodies are healthy and safe from contamination.

#### 2.a.ii. Project Timing

SRMT is committed to maximize grant funds by following an aggressive 3 year schedule that shall include, but not be limited to: immediately begin to prepare a qualified environmental professional (QEP) request for proposals (RFP) upon receiving the grant; review, update, and solicit new sites for the inventory once the RFP is sent out; conduct necessary site approval and begin Phase I environmental site assessments (ESA) once QEP is awarded (approximately 2 weeks from submission date); complete a minimum of 4 Phase I ESAs within the first year; complete a minimum of 2 Phase II ESAs within the first year; complete the remaining Phase Is, Phase IIs, and remediation planning necessary for any needed clean-up within the second year as outlined in the task description under 2.b.i. below. SRMT anticipates that if awarded the grant, the target sites described in this application should be redeveloped by the third year of the grant cycle and all tasks be completed by the end of the second year.

#### 2.a.iii. Site Selection

An initial list of sites and site selection scoring was generated during our 128 (a) grant. The scoring criteria was focused on meeting community needs which included protecting sites of cultural significance, preservation of sustenance resources, redevelopment potential, protecting water sources and wetlands, insuring safe and healthy residences, and job creation. Although the Tribal government is the authoritative “owner” of reservation lands, individual property owners are issued land deeds and are considered the owners of their parcels and their cooperation is required for work to continue. For this reason, the database also included willingness of property owner to participate, reduction of threats to human health and the environment, and potential to maximize existing infrastructure. The environmental staff scored the sites. The scoring will be reviewed during a public meeting and the community will be given the opportunity to review and comment on the listed sites. The highest ranked sites, using our scoring criteria and community input, will be selected for further investigation.

2.b. Task Description and Budget Table 2.b.i Task Description

**Task 1-Cooperative Agreement Oversight:** The Environmental Division staff in combination with SRMT staff of various departments will act as the project's Steering Committee. The environmental department will be responsible for developing the Request for Proposals, advertising, and evaluating, ranking, and hiring a QEP. Oversight by the Steering Committee will include engagement in Brownfields education meetings, attending conferences, and tracking and reporting the status of the Brownfields program with quarterly reports to EPA. The QEP will assist with updates to EPA's Assessment, Cleanup, and Redevelopment Exchange (ACRES) database, data for quarterly progress, and Fair Share reports.

The budget is based on personnel time of the Brownfields Redevelopment Specialist (BRS) at 390 hours x \$25.99/hour (\$10,120.50). Steering Committee members who volunteer time, equipment, or other eligible services will be considered in-kind services. **Outputs:** bid documents, attendance at a pre-award meeting, preparation of quarterly, final, and M/WBE reporting; QEP procurement; and managing the ACRES database.

**Task 2-Community Participation and Site Identification:** SRMT understands community outreach is critical for a truly successful project and will be vigilant in exercising all reasonable methods for cumulating participation from all available parties. Public participation is expected to include, but not be limited to, promoting the program, receiving input, and announcing completion and successes of each site. Public meetings will be held to discuss findings of each of the project phases including the site selection process, and Phase I and Phase II investigation results. SRMT will utilize many multimedia communication approaches as outlined in Section 3.a to insure the public is informed and has the opportunity to comment. Environmental Division staff will send out a call for new site nominations to Tribal community resource users and the general public. Once the inventory is updated, the Steering Committee will evaluate and prioritize the sites based on protecting sites of cultural significance, preservation of sustenance resources, redevelopment potential, protecting water sources and wetlands, job creation, willingness of property owner to participate, reduction of threats to human health and the environment, and maximize existing infrastructure. The budget is based on personnel time of the BRS at 390 hours x \$25.99/hour (\$10,120.50) and contractual time at 40 hours x \$100/hour (\$4000). **Outputs:** 10 Steering Committee meetings, 3 public educational meetings, and one public outreach publication, updated site inventory lists of potential sites with their respective matrix scoring and the selection of sites to be investigated.

**Task 3 –Site Assessments:** The Environmental Division staff and the QEP will conduct Phase I, and Phase II Environmental Site Assessments (ESAs) in accordance with current American Society of Testing Materials (ASTM) standards as well as the EPA All Appropriate Inquiry rule. Based on the results of the Phase I ESA, the Steering Committee shall determine which sites to conduct a Phase II ESA. Prior to conducting a Phase II ESA, a site-specific Quality Assurance Project Plan and Health and Safety Plan (HASP) will be prepared for the purpose of collecting defensible data and providing personal protection from potential contaminants. SRMT anticipates 5 Phase I ESAs and 4 Phase II ESAs will be completed. The budget is based on personnel time of the BRS at 390 hours x \$25.99/hour (\$10,120.50) and contractual time for Phase I: 4 sites x \$5,000 per site (\$20,000) and Phase II including QAPPs and HASPs: 4 Sites x \$25,000 per Site (\$100,000). **Outputs:** 4 Phase I ESA's and 4 Phase II ESAs.

**Task 4-Remediation Planning:** If warranted, a Remedial Action Plan and an Analysis of Brownfields Cleanup Alternatives (ABCA) will be prepared for the purpose of designing appropriate mitigation measures. These plans shall take into consideration redevelopment scenarios, NY State cleanup goals, and input from appropriate parties. All documents shall be reviewed by the Steering Committee and EPA. The budget is based on personnel time of the BRS at 390 hours x \$25.99/hour (\$10,120.50) and contractual time of 95.65 hours x \$100/hour (\$9,565) for 2 documents for 3 sites (6 documents total). **Outputs:** public meetings, 2 ABCAs and 2 remediation reuse documents, and public comment response documents. Fringe benefits include statutory benefits, SUTA, FUTA, FICA, disability and life insurance. It also includes non-statutory benefits such as health insurance and retirement. Other: Financial and Performance Reporting costs include administrative assistance with finances and accounting related to the grant. There are no travel, equipment, or supplies costs for this grant. These costs are addressed using our 128 (a) funding.

2.b.ii Budget Table

Budget Categories	Project Tasks (\$) [Programmatic Costs Only]				
	Task 1	Task 2	Task 3	Task 4	Total
<b>Personnel</b>	<b>\$10,120.50</b>	<b>\$10,120.50</b>	<b>\$10,120.50</b>	<b>\$10,120.50</b>	<b>\$40,482.00</b>
<b>Fringe Benefits</b>	<b>\$2635.75</b>	<b>\$2635.75</b>	<b>\$2635.75</b>	<b>\$2635.75</b>	<b>\$10,543.00</b>
<b>Travel<sup>1</sup></b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
<b>Equipment<sup>2</sup></b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
<b>Supplies</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
<b>Contractual (QEP)</b>	<b>\$0.00</b>	<b>\$4,000.00</b>	<b>\$120,000.00</b>	<b>\$9,565.00</b>	<b>\$133,565.00</b>
<b>Other: Financial and Performance Reporting</b>	<b>\$3,852.50</b>	<b>\$3,852.50</b>	<b>\$3,852.50</b>	<b>\$3,852.50</b>	<b>\$15,410.00</b>
<b>Total Budget:</b>	<b>\$16,608.75</b>	<b>\$20,608.75</b>	<b>\$136,608.75</b>	<b>\$26,173.75</b>	<b>\$200,000.00</b>

<sup>1</sup> Travel to brownfields-related training conferences is an acceptable use of these grant funds.  
<sup>2</sup> EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for assessment grants.  
Reminder: Administrative costs, such as indirect costs, of grant administration with the exception of financial and performance reporting costs are ineligible grant activities.

2.c. Ability to Leverage

SRMT has received 128(a) Brownfields grant funding yearly since 2010 and anticipates continued funding at an average of \$106,000 per year. The 128(a) Brownfields Program will provide the additional funding needed for staff wages. The total budget available for staff wages is approximately \$52,000.00.

SRMT has also entered into its third Performance Partnership Agreement (PPA) with the USEPA, Region 2. The PPA memorializes the long-standing relationship between SRMT and USEPA to address environmental priorities of mutual concern. This agreement establishes goals and objectives SRMT has for achieving environment protection and human health protection and for measuring progress toward these goals in collaboration with USEPA. Some program areas will utilize the PPA as its work plan for the Performance Partnership Grant (PPG) that is the funding vehicle for the Tribe’s Environment Division.

SRMT will continue to pursue any additional funding that will help fund costs of additional investigation activities, cleanup, and redevelopment activities. The Environmental Division staff

will complete administrative activities not covered under the Brownfields program as in-kind services. SRMT contributed services for the 128(a) grant such as excavators and operators, GPS services, mapping, and equipment. SRMT anticipates continuing to provide these services and materials for the next grant cycle.

### 3. COMMUNITY ENGAGEMENT & PARTNERSHIPS

#### 3.a. Plan for Involving Targeted Community & Other Stakeholders; and Communication

##### 3.a.i. Community Involvement Plan & 3.a.ii. Communicating Progress

Upon receiving the award, SRMT will notify the local and regional newspapers, local newsletters, broadband television, cable access television operators, local radio, and community organizations (COs). Our plan is to obtain community and stakeholder feedback during each project milestone. Milestones include site selection, following the Phase I and geophysical surveys, following Phase II ESAs, prior to and following ABCA preparation, and prior to completing any site reuse plans. We will actively seek community involvement using the following proven and effective methods. It should be stressed that the methods are diverse because one method will not be effective for all our tribal members. For instance, our elderly populations do not frequent social media sites and are youth do not review flyers or local notices. Some of our members will prefer door to door surveys. One of our most successful methods for distributing information is through our interactive mobile kiosk which is brought to various community events and allows individuals to explore, via touch screen, all aspects of our Brownfields program, including photos, videos, and games.

As the program progresses, outreach efforts on each phase will include web and social media site updates by SRMT and COs, public access TV coverage, local public meeting advertisements, neighborhood surveys in combination with program/site information flyers, newspaper press releases, and CO e-newsletters. Tribal media includes a Newsletter, community flyer, and the SRMT Website. Notice of all the public meetings will be placed in tribal offices, and the local newspaper. Invited public comments can be sent directly to SRMT via website, direct e-mail, regular mail, or telephone conversation. The Tribal Offices will serve as the information repository for all hard copy program related documents. Our Health Center will identify low income, pregnant women and the elderly. SRMT will be conscientious of sensitive populations and will conduct door to door surveys, if warranted. SRMT will involve students at the Salmon River Junior and Senior High Schools and the Akwesasne Freedom School through workshops and preparation of presentation media. Student involvement will result in more interest from the general public and will help broaden student horizons on environmental and community issues. All written and verbal communication will be in English and Kanien'keha (Mohawk Native Language) unless otherwise proven necessary. Our community is currently experiencing a large push to infuse all media with as much Kanien'keha as possible to help our younger generations speak and understand and our elders to share and revive our language.

#### 3.b. Partnerships with Government Agencies 3.b.i Local/State/tribal Environmental Authority

SRMT's Environmental Division will be responsible for the implementation of this grant as well as maintaining our current 128 (a) grant. This group has successfully been working with our Brownfields sites since 2010. Our Environmental Division works closely with all divisions of our tribal government and has developed close ties with our community based organizations and numerous tribal members.

3.b.ii. Other Relevant Governmental Partnerships

SRMT will partner with EPA and our Indian Health Service. The EPA will provide input and guidance throughout the duration of the program, including the review of technical submittals, reuse plans, and long-term sustainable cleanup for each site. The SRMT Indian Health Service is prepared to support public health efforts to reduce chronic diseases, promote healthier lifestyles, reduce health disparities, and control health care spending. SRMT anticipates our Health Service will support the program by identifying and educating the public on health risks and identifying and communicating with sensitive populations.

3.c. Partnerships with Community Organizations

3.c.i. Community Organization Description & Role

Akwesasne Boys & Girls Club (ABGC)- The Mission is “to inspire and enable all young people, especially those who need us the most, to realize their full potential as productive, responsible, and caring community members”. They are a non-profit after school program serving community children 6-20 and their families since 2001. The ABGC will assist with meeting space and supporting environment in this proposal.

Akwesasne Chamber of Commerce- Our goal is to promote the Akwesasne economy, assist, and launch & support Akwesasne businesses. They realize the need for new businesses, housing and green space. We help by working and growing together, offer member support and visibility within the community. The Akwesasne Chamber of Commerce will offer meeting space and support from their membership.

Akwesasne Task Force on the Environment (ATFE)- ATFE is a community based grass-roots organization formed in 1987 to address environmental problems. The ATFE mission is “to conserve, preserve, protect and restore the environment, natural and cultural resources within the Mohawk territory of Akwesasne in order to promote the health and survival of the scared web of life for future generations and fulfill our responsibilities to the natural world as our Creator has instructed”. The ATFE will help with community support for this proposal.

Akwesasne Cultural Center-The Akwesasne Library and Cultural Center is a public library and museum that serves the people of Akwesasne, the surrounding communities and the visiting public by providing access to educational and cultural resources and services. Located in the heart of Akwesasne, the Akwesasne Cultural Center consists of the library and museum. They can offer space for literature and community support.

3.c.ii. Letters of Commitment See Attachments.

4. PROJECT BENEFITS

4.a. Health and/or Welfare and Environment 4.a.i. Health and/or Welfare Benefits

All Tribal members will benefit from the identification and potential mitigation planning of contaminants provided by this assessment grant. This can be shown using the three example sites that were discussed earlier in this application.

Health benefits for our entire community will be realized when our community water source is protected from potential contaminants related to the former marina site. Once the site has been evaluated and potential contamination is addressed, we can initiate improvements to the proposed park including paved parking for vehicles and boat trailers. The improvements will take into consideration climate resiliency and will be designed and constructed to take into

consideration future flooding. This will insure potential future impacts to the soil and groundwater near our water source are protected. This also helps promote are welfare through improved waterfront access and a safe and healthy greenspace. Parents will no longer be concerned about their children swimming in this area or playing in the river sediments surrounding the former marina.

#### 4.a.ii. Environmental Benefits

The reservation is suffering from environmental concerns consisting of the aging steel USTs, ASTs and associated piping that have never been removed from the ground. Many of these USTs and ASTs still contain product. Environmental benefits through this grant will be realized when each of these former gasoline stations are evaluated to determine the environmental risks. Our tribal members that reside at some of these former gas stations will be better able to live in peace knowing that their health is not currently or in the future being affected by potential underlying contaminants. We will also gain an understanding if these sites are impacting the waterways that are in many cases very close to the Brownfields sites. If impacts are identified, we will address them and protect our precious resource that is the soul of our cultural heritage. The SRMT Environment Division is investigating the impacts of climate change on the resources, assets, and community of Akwesasne and is developing recommendations for actions to adapt to projected climate change impacts. This plan is a first step in an effort to develop practical actions that the Tribe can take in order to adapt to ongoing and expected climate changes. The plan revolves around the criteria of our Thanksgiving Address which is a listing of natural resources such as the earth, water, and animals, and why we are thankful that they exist. Many of these resources are used in cultural activities that promote our local economy such as basketmaking and fishing. The health and availability of these resources are directly affected by the presence of Brownfields sites and stand to benefit from the completion of site assessments, cleanup activities, and redevelopment.

#### 4.b. Environmental Benefits from Infrastructure reuse/Sustainable Reuse 4.b.i. Planning, Policies, and Other Tools

Our best location for creating successful businesses is on Route 37 in the general vicinity of the former gasoline station and junkyard. This area already contains all of the necessary infrastructure for development of new businesses. It maintains the highest traffic counts for our Reservation and provides the best visibility to potential customers traveling to our gaming locations or to other distant towns.

SRMT has a comprehensive economic development strategy (CEDDS). The goal of the CEDDS is to evaluate tribal population and demographics and learn about current tribal economic activity and needs. The CEDDS also explores issues related to tribal infrastructure, education and career development programs, housing and community facilities, and fee land utilization.

SRMT also has a Strategic Energy Plan Mission which consists of 1) Reduce energy usage and costs in tribally-owned facilities and in the homes of tribal members and 2) Develop energy resources on tribal lands that create jobs and creates revenue for the Tribe, economic development for the region, and greater tribal energy self-sufficiency. For all new building business structures SRMT will encourage green buildings with energy efficient construction. SRMT anticipates applying green and sustainable remediation when feasible. Implementation will include site-specific employment of products, processes, technologies, and procedures that mitigate contaminant risk to receptors while making decisions that are cognizant of balancing

community goals, economic impacts, and environmental effects. SRMT will work towards methods to reduce energy output, decrease pollution, conserve resources, and protect the environment.

4.b.ii. Integrating Equitable Development or Livability Principles

This grant will complement livability principles and equitable development by increasing our economic competitiveness and supporting and valuing our existing community and neighborhoods. This grant will lead to affordable healthier homes, buildings, and neighborhoods where the former gasoline stations are located. It will also identify areas that may require environmental remediation to improve air and water quality. This will protect our waterways and the aquatic fauna and flora that we use for food, medicinal, and cultural purposes. It will improve access by residents to greenspace and recreational property at the former marina site, and improve employment opportunities by creating a location for new businesses on Route 37 in the vicinity of the former gasoline station and car part junkyard.

4.c. Economic and Community Benefits 4.c.i. Economic or Non-Economic Benefits

Redevelopment of the former marina site will greatly enhance our welfare by first insuring that the community water source is protected and by providing a safe greenspace for recreation and waterfront access. Once the assessment and potential remediation is complete we can begin the redevelopment with tribal funding to convert a blighted dock and surrounding marina relicts into a clean and welcoming greenspace. This new park will provide a wonderful place to enjoy the water and provide an ideal location for fishing.

Additional non-economic benefits will be to alleviate the fears of the residents and neighbors of the former gasoline stations. These people will not have to live with the anxiety that their properties are adversely impacting their health or the nearby water bodies. They will not have to caution their children about playing on potentially petroleum-impacted river banks or be worried about harvesting plants for medicinal purposes and basket weaving. Sweetgrass basketmaking typically requires two hands and one mouth to hold the grass during construction. The idea of placing the potentially impacted grass in your mouth has limited the harvest of this important plant and affected our cultural identity.

Once the fear of exposure to environmental contamination has subsided, it is expected that cultural activities such as basketmaking, hunting, trapping, fishing, and medicinal plant picking will become more abundant and may require a central location or building for the selling of products and the sharing of information with the community and visitors. The redevelopment of one of our many abandoned marinas along the river would serve as an ideal location for such a venture. This type of redevelopment could also provide jobs, revenue, cultural awareness, promote tourism, and help protect our river environment through sustainable harvesting practices.

4.c.ii. Job Creation Potential

A priority will be made to contract qualified tribal members for any and all jobs through the efforts of Akwesasne Employment Resource Center (AERC). AERC is one of our community partners and primary purpose is to match job seekers to employers. AERC maintains a listing of people and their credentials which provides a great way for employers to find qualified employees. AERC will assist with all aspects for job creation including seeking opportunities for both employees and employers. Job creation can be expanded with elimination of potential

pollutants to our sweetgrass habitat. This will expand our native craft production which will be used to bolster our work force and provide more economic benefits to our tribal members through increased sales of our crafts such as sweetgrass baskets.

## 5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

### 5.a. Programmatic Capability

Julia Jacobs is the current Brownfields Redevelopment Specialist (BRS) for the SRMT Environment Division and maintains the 128(a) Brownfields Work Plan. Most of the work described in this proposal will be conducted by the BRS and includes all of the wages for this work. Other staff that will contribute time to this Work Plan through the 128(a) Brownfields Emergency Response Program include Ken Jock, the Environmental Division Director who has over 35 years' experience working in the environmental and cultural departments of Akwesasne. Les Benedict, the Environment Division Assistant Director who is the main contact for our Brownfields Emergency Response Program. Mr. Benedict has 28 years' experience in the environmental field. Mr. Jock and Mr. Benedict work cooperatively with all departments within the Saint Regis Mohawk Tribe, Environmental Division, the Tribal Administration, outside community organizations as well as applicable local, state, and federal agencies.

### 5.b. Audit Findings

SRMT has had no adverse audit findings.

### 5.c. Past performance and Accomplishments

#### 5.c.i. Currently or Has Ever Received an EPA BF Grant

##### 5.c.i.1. Compliance with Grant Requirements

In the past four years, SRMT has received annual funding under a 128a Brownfields Emergency Response Program grant. Funding from the previous grants was entirely committed. SRMT fully complied with its work plan and reporting requirements including quarterly and financial status reports, WBE/MBE documentation.

##### 5.c.i.2 Accomplishments

Since 2010, we have used our 128 (a) Tribal Response Grant to work toward achieving the goals of developing and implementing the Four Elements. These elements are: 1. the timely survey and inventory of Brownfields sites; This is 80 % complete and we have developed a database identifying our Brownfields sites. 2. Develop the oversight and enforcement authorities or other mechanisms and resources to ensure that a response action will protect human health and the environment; we have completed 99 % of this task by developing our September 2011 draft of Brownfields Oversight and Enforcement Policies and Procedures. 3. Develop the mechanisms and resources to provide meaningful opportunities for public participation; we are 80 % complete in establishing our ways to conduct community outreach although we are always open to new and better methods; and 4. Develop mechanisms for approval of a cleanup plan and verification and certification that cleanup is complete; we have completed 50 % of this task and are in the process of evaluating the best way to implement our draft policies. In 2015, we completed our first Phase I ESA on the "Frogtown Site" and will continue to investigate the site through a future Phase 2 ESA.

**APPENDIX 1**

**THRESHOLD DOCUMENTATION**

## Community-Wide Brownfield Assessment Grant Proposal, Saint Regis Mohawk Tribe

### **APPLICANT ELIGIBILITY**

#### Site Eligibility (Site-Specific Proposals Only)

N/A: This is a Community-Wide proposal and not a Site Specific Proposal.

#### Threshold Criteria for Assessment Grants

1. Applicant Eligibility:

The Saint Regis Mohawk Tribe is a federally recognized Native American Tribe

2. Letter from the State or Tribal Environmental Authority:

A letter is not required because the SRMT, the applicant, is the tribal environmental authority.

3. Community Involvement:

Upon receiving the award, SRMT will notify the local and regional newspapers, cable access television operators, partners, and COs.

As the program progresses, outreach efforts on each phase will include web and social media site updates by SRMT and COs, public access TV coverage, local public meeting advertisements, neighborhood surveys in combination with program/site information flyers, newspaper press releases, respective Town, and CO e-newsletters. Tribal media includes a Newsletter, community flyer, and the SRMT Website. Notice of all the public hearings will be placed in tribal offices and regional newspapers. Invited public comments can be sent directly to SRMT via website, direct e-mail, regular mail, or telephone conversation. The Tribal Government Offices will serve as the information repository for all hard copy program related documents.

Other outreach activities will be to market the properties to prospective developers through videos, brochures, and information through SRMT, local COs, and town websites, as appropriate. Our Health Center will identify low income, pregnant women and the elderly. SRMT will be conscientious of sensitive populations and will conduct door to door surveys, if warranted.

SRMT will involve students at the Salmon River Junior and Senior High Schools and the Akwesasne Freedom School through workshops and preparation of presentation media. Student involvement will result in more interest from the general public and will help broaden student horizons on environmental and community issues.

If a translator is needed, we will provide one.

4. Site Eligibility and Property Ownership Eligibility (Site Specific Proposals Only)

N/A: This is a Community Wide proposal and not a Site Specific Proposal.

**APPENDIX 2**

SUPPORT LETTER FROM TRIBAL ENVIRONMENTAL AUTHORITY

None required, the SRMT is the Tribal Environmental Authority

## **APPENDIX 4**

LETTERS OF SUPPORT FROM COMMUNITY BASED ORGANIZATIONS



**AKWESASNE BOYS & GIRLS CLUB**

*Great Futures Start Here*

Phone: 518-358-9911 Fax: 518-358-9452

[www.myabgc.com](http://www.myabgc.com)

**U S ADDRESS**

37 Rooseveltown Road PO Box 490  
Akwesasne, New York 13655

**CANADIAN ADDRESS**

P.O. Box 399  
St. Regis, Quebec H0M 1A0

Saint Regis Mohawk Tribe Environment Division  
C/o Ken Jock Director of Environment  
412 State Route 37  
Akwesasne, New York 13655

Re: Saint Regis Mohawk Tribe/U.S. EPA Brownfields

Shé:kon Mr. Ken Jock,

The Akwesasne Boys and Girls Club is pleased to submit this formal letter in support of the Saint Regis Mohawk Tribe Environment Division's proposal for EPA's Brownfields Community Wide Petroleum Assessment Grant for the community of Akwesasne.

We support the proposed activities identified in this application and can help with meeting space, getting the word out and community support. We look forward to a continued strong working relationship. Our students are very interested in the redevelopment of Brownfield sites in our community, shown by their creative ideas during recent Brownfields outreach here at our Akwesasne Boys and Girls Club this summer.

Sken:nen/Peace

Jessica Cree Jock  
Director of Akwesasne Boys and Girls Club  
31 Rooseveltown Road  
Rooseveltown, New York



261 Frogtown Road/Akwesasne, NY 13655/518-333-2005/akwesasnechamber@hotmail.com

Saint Regis Mohawk Tribe Environment Division  
C/o Ken Jock Director of Environment  
412 State Route 37  
Akwesasne, New York 13655

November 18, 2015

Re: Saint Regis Mohawk Tribe/U.S. EPA Brownfields

Shé:kon Mr. Ken Jock,

The Akwesasne Chamber of Commerce is pleased to submit this formal letter in support of the Saint Regis Mohawk Tribe Environment Division's proposal for EPA's Brownfields Community Wide Petroleum Assessment Grant for the community of Akwesasne.

Our Akwesasne community is in need of new businesses, housing and green space. Please accept our expressed interest and support to the Saint Regis Mohawk Tribe Environment Division's Brownfields program for approval of their grant request. The Akwesasne Chamber of Commerce supports the proposed activities identified in this application and can help with meeting space, getting the word out and community support. We look forward to a continued strong working relationship.

Sken:nen/Peace

A handwritten signature in black ink that reads "Dwayne Thomas". The signature is written in a cursive style with a large initial "D" and "T".

Dwayne Thomas, President  
Akwesasne Chamber of Commerce  
261 Frogtown Road  
Akwesasne, New York 13655



## **AKWESASNE TASK FORCE ON THE ENVIRONMENT**

P.O. Box 992, Hogansburg, NY 13655

Saint Regis Mohawk Tribe Environment Division

C/o Ken Jock Director of Environment

412 State Route 37

Akwesasne, New York 13655

December 4, 2015

Re: Saint Regis Mohawk Tribe/U.S. EPA Brownfields

Shé:kon Mr. Ken Jock,

The Akwesasne Task Force on the Environment is pleased to support of the Saint Regis Mohawk Tribe Environment Division's proposal for EPA's Brownfields Community Wide Petroleum Assessment Grant for the community of Akwesasne.

The Akwesasne Task Force on the Environment supports the proposed activities identified in this Brownfields application and can help with community support. We look forward to a continued strong working relationship and are very interested in the redevelopment of Brownfield sites in our community as it could restore our natural resources that we utilize such as black ash basket making and medicines. Please accept our expressed interest and support to the Environment Division's Brownfields program for approval of their grant request.

Sken:nen/Peace

Craig Arquette  
ATFE Chairman



*Akwesasne Cultural Center*

Saint Regis Mohawk Tribe Environment Division

C/o Ken Jock Director of Environment

412 State Route 37

Akwesasne, New York 13655

Re: Saint Regis Mohawk Tribe/U.S. EPA Brownfields

Shé:kon Mr. Ken Jock,

The Akwesasne Museum is pleased to support of the Saint Regis Mohawk Tribe Environment Division's proposal for EPA's Brownfields Community Wide Petroleum Assessment Grant for the community of Akwesasne.

The Akwesasne Museum supports the proposed activities identified in this application and can help with providing space for Brownfields literature and community support. We look forward to a continued strong working relationship. Students who take our classes/workshops are very interested in the redevelopment of Brownfield sites in our community as it could restore our natural resources that we utilize for our classes/workshops such as black ash basket making, medicines, corn husk dolls and feathered fans. As part of Akwesasne's cultural tourism working group, the museum is also interested in seeing lands return to their natural beauty for improved quality of life in Akwesasne. Please accept our expressed interest and support to the Environment Division's Brownfields program for approval of their grant request.

Sken:nen/Peace

Sue Ellen Herne

Akwesasne Museum Program Coordinator

Akwesasne Cultural Center

321 State Route 37

Hogansburg, New York 13655

**Application for Federal Assistance SF-424**

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
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* 3. Date Received: <input type="text" value="12/18/2015"/>	4. Applicant Identifier: <input type="text"/>
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5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>
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**State Use Only:**

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
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**8. APPLICANT INFORMATION:**

\* a. Legal Name:

* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="16-1007650"/>	* c. Organizational DUNS: <input type="text" value="7978166470000"/>
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**d. Address:**

* Street1:	<input type="text" value="412 State Route 37"/>
Street2:	<input type="text"/>
* City:	<input type="text" value="Akwesasne"/>
County/Parish:	<input type="text"/>
* State:	<input type="text" value="NY: New York"/>
Province:	<input type="text"/>
* Country:	<input type="text" value="USA: UNITED STATES"/>
* Zip / Postal Code:	<input type="text" value="13655-3109"/>

**e. Organizational Unit:**

Department Name: <input type="text" value="Environment Division"/>	Division Name: <input type="text"/>
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**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Ken"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Jock"/>	
Suffix: <input type="text"/>	

Title:

Organizational Affiliation:

* Telephone Number: <input type="text" value="518.358.5937"/>	Fax Number: <input type="text" value="518.358.6252"/>
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\* Email:

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

I: Indian/Native American Tribal Government (Federally Recognized)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Environmental Protection Agency

**11. Catalog of Federal Domestic Assistance Number:**

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

**\* 12. Funding Opportunity Number:**

EPA-OSWER-OBLR-15-04

\* Title:

FY16 Guidelines for Brownfields Assessment Grants

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Saint Regis Mohawk Tribe Brownfields Community-Wide Petroleum Assessments of Tribal Lands

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="200,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed: