Ounalashka Corporation
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R10-24-C-001

RE: FY2024 EPA Brownfields Cleanup Grant Application

Ounalashka Corporation is pleased to submit this proposal for FY2024 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. Funding Requested:
(a) Grant Type: Single Site Cleanup
(b) Federal Funds Requested: $2,000,000

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

4. Property Information:
(a) Property Name: Strawberry Hill Landfill
(b) Property Address: Strawberry Hill, Amaknak Island, Unalaska, AK 99685 OBJ
(Latitude/Longitude: 53.884229/-166.541029)

5. Contacts:
(a) Project Director:
Name: Natalie A. 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: Vincent M. Tutiakoff, Sr., Chairman of OC Board of Directors
Phone: 907-581-1276 | Email: vtutiakoff@ounalashka.com
Mailing Address: P.O. Box 149, Unalaska, Alaska 99685

6. Population: OC has 531 shareholders many of whom are also members of the Qawalangin Tribe – a federally recognized Tribe. The project will benefit all residents within the City of Unalaska, which has approximately 4,339 permanent residents (according to the U.S. Census Bureau, American Community Survey 5-Year Estimates, 2021) and a reported peak population of up to 10,000 during fishing season.

7. Other Factors:

Other Factors Criteria	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	1
The priority 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 priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1, 2
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	2, 3
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

NA = Not applicable

8. Releasing Copies of Applications: Not applicable – the application does not contain confidential, privileged, or sensitive information.

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1.a. Target Area & Brownfields

1.a.i. Overview of Brownfield Challenges & Description of Target Area: Ounalashka Corporation (OC) owns 115,200 acres of land on Unalaska and Amaknak Islands located near the center of the Aleutian Islands in southwest Alaska. The islands are bordered by the Bering Sea to the north and the Pacific Ocean to the south. Unalaska and Amaknak Islands are connected by a 500-foot long bridge and together the islands include 80% of the urbanized area of the City of Unalaska. The City of Unalaska (City) occupies a 210 square mile area spanning Unalaska and Amaknak Islands and is the westernmost population center of the US. The physical isolation of the area is highlighted by the 800-mile distance from Unalaska to Anchorage where the nearest hospital is located. This isolation is one of many factors shaping the area's extraordinary brownfield challenges. Amaknak Island contains 59% of the City's population, while accounting for <3% of its land area.[1] The City is also home to 84% of the population (4,339 of 5,251 residents) living within the Aleutians West Census Tract (CT #02016000200) – a disadvantaged CT according to the Climate and Economic Justice Screening Tool (CEJST).

The indigenous 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 of environmental injustice in US history. 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 return following the war.[2] 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 ~~the~~ 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 below ground heating oil tanks 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 bottom during the spring thaw.

The unjust seizure of lands was partially redressed in 1971 by the Alaskan Native Claims Settlement Act (ANCSA), which led in 1973 to the formation of Alaskan Native Regional and Village Corporations including OC – which is the Alaskan Native Village Corporation (ANVC) entrusted with the lands of the Qawalangin Tribe of Unalaska (Q-Tribe). The lands allocated to OC include over 90% of the areas utilized by the US military during WWII and include 102 sites within the City of Unalaska that are currently in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database, of which 67 are currently listed as "active" with investigation or cleanup activities not yet completed.[3]

The brownfield challenges include: (1) the extraordinarily large number of sites in a small community; (2) the large size and complexity of contamination issues at many sites; (3) the complex web of rules and regulations applicable to Formerly Used Defense Sites (FUDS), which include sites impacted by acts of war on Unalaska; (4) the potential historical significance and presence of archaeological artifacts on a majority of the contaminated sites (due to WWII and the prior 9,000 years of human occupation); (5) the assessment challenges associated with the remote location, harsh weather conditions, and extraordinary mobilization costs; (6) the high cleanup costs due to contaminated soil requiring transport by ship to landfills in Anchorage or Seattle for disposal; and (7) the exceptional redevelopment challenges associated with a remote island in the Bering Sea (and the small market, high construction costs, and other factors related to the remote location).

The Target Area (TA) is a 136.4-acre vacant hill, known as **Strawberry Hill**, located at the center of Amaknak Island in the Aleutians West CT #02016000200. The TA is surrounded by existing residential areas, a grocery store, WWII Museum, and several shipping companies that support the local fishing industry. The entire area was subject to intensive use by the military during WWII, with dozens of military structures and two 1-million-gallon concrete petroleum underground storage tanks (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 as well as for key desired community facilities such a regional hospital.

1.a.ii. Description of the Proposed Brownfield Site(s): 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. **The Strawberry Hill Landfill (SHL) is a 1-acre FUDS located in the center of the Strawberry Hill TA** 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 of the land and constructed two 1-million-gallon

[1] *City of Unalaska, Comprehensive Plan 2020 – Unalaska, Alaska. Adopted February 22, 2011. Link. Accessed 10/27/23.*
[2] *Aleutian Pribilof Islands Association, History. Link. Accessed 10/27/23.*
[3] *Division of Spill Prevention and Response (alaska.gov). Accessed 10/28/23.*

petroleum USTs, a water tower, and several WWII structures. In the 1980s, the US Army Corps of Engineers (USACE) created at least four landfills on Strawberry Hill as part of the WWII Debris Disposal and Site Restoration Project**. The area of focus for this grant, the SHL, is 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 SHL. The ADEC permit for SHL specified a four-foot vertical separation between the groundwater table and bottom of waste, three feet of cover over the ACM waste, including a 24-inch final cover with established vegetation. It is unknown if the landfill was constructed, operated and closed in accordance with the post-closure, issued permit requirements. Furthermore, it is unknown if the SHL was surveyed to document as-built conditions, records of volume and types of wastes disposed, and photographic records were ever submitted as part of the permit conditions to ADEC. SHL was closed in 1986 and covered with fine-grained clay and sandy silt. There have been no environmental cleanup activities since USACE closed the landfill. The ADEC Permit did not require periodic monitoring or inspections of the landfill, fencing, or signage beyond the ACM posting sign at the entrance to SHL. These actions may have been satisfactory at the time, but do not meet today's closure requirements to be protective of human health and the environment.

Site characterization activities confirmed concentrations of iron, arsenic, and cadmium in surface water that emerges at the toe of landfill (with final discharge to ***Iliuliuk Harbor***) exceed cleanup levels. Additionally, detectable concentrations of Polycyclic Aromatic Hydrocarbons (PAHs) and metals were found in groundwater as shallow as 5 feet below ground surface. There are concerns the shallow groundwater table is transporting contaminants downgradient to ***Iliuliuk Lake*** and ***Iliuliuk Harbor*** which are popular fishing locations for locals. Although previous site investigations confirmed ACM is not impacting the groundwater, there is concern that over time the contaminants will leach into groundwater and be carried offsite given some of the materials were improperly disposed (i.e. not bagged prior to disposal). Under this project, OC is proposing to remove the ACM and contaminated soil (~800 tons of contaminated media) and excavate, transport, and remove the materials off island. The excavated areas will be backfilled with clean fill materials suitable for future redevelopment activities. The Site is a high priority for redevelopment due to its size, desirable location, and the scarcity of developable land in the City of Unalaska. Given the location of SHL situated in the center of the Strawberry Hill TA, this area of the site must be remediated before any redevelopment activities can be initiated on the Hill.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy & Alignment with Revitalization Plans: Projected reuses for the Strawberry Hill TA include a mix of single-family and multi-family housing together with commercial and institutional uses – in particular, a regional hospital. These uses are consistent with the City of Unalaska's *2020 Comprehensive Plan*, and associated *2020 Housing Plan* which identify Strawberry Hill as one of three primary "midterm housing sites." The Housing Plan identifies eight predevelopment steps necessary to successfully position the area for housing development, 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, the TA includes six sites identified in the **Q-Tribe's *Strategic Project Implementation Plan (SPIP)*** as priority sites for additional environmental assessment and environmental cleanup activities, with SHL being one of the highest priority sites to address.

1.b.ii. 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 our future, without which Unalaska will not be able to retain its current residents or accommodate additional residents. Therefore, over the next ten years it will be essential to make more land available for the development of quality, affordable housing." Development of housing results in 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 on Strawberry Hill 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.

Climate Adaptation/Mitigation Capacity & Resilience Outcomes: Alaska is at the forefront of climate change, with temperatures increasing at more than twice those in the rest of the US, or about +6-9 ^{o}C (+11-16 ^{o}F) by the end of the century. Warming temperatures will potentially alter the climate in Alaska so profoundly that the number of thunderstorms will triple, increasing the risks of widespread flash flooding and landslides, new research finds. Alaska is already experiencing damaging impacts from warmer temperatures, including record heat waves, landslides and sinkholes caused by melting permafrost. These changes will have a profound effect on Alaskan infrastructure. Unalaska has already been experiencing an increase in

the magnitude and timing of storm events, including increased wave action, wind, and erosion. The unprecedented change in climate increases the risk of contaminant release to water and the environment, affecting fish, marine mammals, and wildlife populations, which impacts food sovereignty and security. Consequently, as the receiving environment changes due to climate, the detrimental impacts of exposure from the contaminants that were present at the time of ANCSA land conveyance is exacerbated. Revitalization of the TA will support community efforts to become more resilient to climate change impacts by incorporating adaptation and mitigation strategies throughout the assessment, cleanup and redevelopment process. Specifically, OC is using our FY2023 EPA Brownfield Community-Wide Assessment (CWA) Grant for Tribes to conduct an infrastructure evaluation (further described in 1.c.iv) that includes reviewing adaptation strategies for coastal resiliency to inform redevelopment activities. The strategy to build on Strawberry Hill 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. Finally, OC is presently working on **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.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Characterization: Per ADEC's determination in their letter provided as Attachment B, the site has been sufficiently characterized to move forward with cleanup activities. Should the need for additional site characterization arise at SHL and/or adjacent properties, OC will use our recently secured **$2M FY2023 EPA Brownfield CWA Grant for Tribes** to conduct site investigation activities.

1.c.ii. Resources Needed for Site Remediation: The amount of ACM debris is estimated to be 500 tons. Additionally, the cleanup plan involves removal of 300 tons of other demolition debris (concrete rubble, metal, ash, etc.) and contaminated soil. The amount of funding requested under this grant application assumes 800 tons of debris removal. Therefore, **the $2M EPA Brownfield Cleanup Grant requested in this application will be sufficient to complete remediation of SHL.**

1.c.iii. 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 has been used in Unalaska by the City to fund upfront costs for utility extensions and other infrastructure improvements.
- **US Dept. of Transportation (DOT) Rebuilding American Infrastructure with Sustainability & Equity (RAISE) Grant**: The Q-Tribe has been successful in securing RAISE Grants for infrastructure improvement projects on property owned by OC.

Funding Resources for Housing Development:

- **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. We have also developed commercial, residential, and other types of developments on our 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. This application can be completed once land (such as the land on Strawberry Hill) is cleaned up and made available for redevelopment.

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 is likely to be private investment. As described above, OC has significant experience working with partners to attract funding needed to finance large-scale development projects.

1.c.iv. Use of Existing Infrastructure: Only 5% of OC lands on Unalaska and Amaknak Islands 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 Strawberry Hill 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 and housing developments while being able to leverage the existing infrastructure. Some minor additional infrastructure (internal access roads and utility connections for individual new buildings) will be required to advance development. As described in Section 1.b.ii, in order to effectively plan for addressing the specific infrastructure needs in each area, OC will complete an "area-wide" infrastructure study for the TA as part of reuse planning activities funding by their FY2023 CWA Grant.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community's Need for Funding: Funding will meet the needs and benefit the Q-Tribe, a federally recognized tribe with 1,200 members. The desired projects will benefit residents throughout the City of Unalaska which is a small community with **less than 5,000 permanent residents**. In addition to being a small community, the City of **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. In addition, since 2019, 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 the second year in a row, 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 in 2019 through 2021, and six of 12 scheduled ships cancelled in 2022, costing jobs and revenue for local businesses that rely on cruise ship tourists. 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 the community. These developments will benefit the Q-Tribe members as well as all members of the local community.

2.a.ii. Threats to Sensitive Populations

2.a.ii(1) 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 76.8% according to the latest census data.[5] The EPA's EJSCREEN tool was used to assess socioeconomic indicators for the City relative to the State as a whole (**Table 1**). The City ranks in the 83rd 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 43rd 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 2019 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.[6]

Table 1: EJScreen Socioeconomic Indicators[4]	Percentile in AK
Demographic Index	**83%**
People of Color Index	**91%**
Low Income Population	43%
Linguistically Isolated	**89%**
Less than High School Education	**79%**

***Red font** = EJ Index >75th Percentile.*

The health challenges for residents in Unalaska are detailed in Section 2.a.ii(2). One 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 are in high demand due to the severe housing shortage on the island. Additionally, the lack of available and affordable housing has resulted in the large seafood processing plants functioning as "industrial company towns" in which workers live in crowded bunk-style or dormitory style housing located on the industrial complexes.

The reuse plans for the Strawberry Hill TA are focused on development of new high quality (and ACM and lead-free) housing, 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. The plans to support development of a regional hospital will help address both health and welfare issues related to the limited access to healthcare services.

2.a.ii(2) 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. The Aleutians West CT within which Unalaska is located is ranked in the lower middle range of CT's in Alaska for low birthweights and high rates of self-reported days of poor

[4] Generated using EPA Environmental Justice Screening (EJSCREEN) Tool on 10/28/23. Data represents Strawberry Hill TA (CT #02016000200).
[5] Source: 2018-2021 American Community Survey, 5-yr data (obtained from www.factfinder.census.gov).
[6] Sobel, Z. (2019, January 7). Expensive Groceries and Health Care Contribute to Unalaska's High Cost of Living. *KUCB Channel 8 TV*. Link.

physical health.[7] Unalaska is in the EJSCREEN 94th state percentile for LBP exposure (see **Table 3**). With its aging building stock, there is also a high likelihood of exposure to asbestos 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 asbestos exposure.

Health data specifically for the 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.[8] 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 Alaska Natives, accounting for over 20% of deaths. The rate of lung and bronchus cancers is 37% higher for Alaska Natives. For birth defects, the prevalence rate among Alaska Native children was 651 per 10K live births in 2017 – a rate nearly two and half times higher than among non-native children (266/10K).[9] Multiple studies have documented a high incidence of Parkinson's Disease (PD) among Alaskan Natives.[10] 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, and fears that it may be attributable to exposure to toxins from the former military sites such as the SHL.

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[11] 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 lead-free housing combined with the replacement of diesel fuel generators as the primary source of power will result in healthier homes that will help reduce lead poisoning and asthma rates. A regional hospital, will increase residents' access to preventative health measures and emergency care services, facilitate earlier diagnosis and treatment of conditions such PD that may be linked to exposure to hazardous substances and pollutants.

2.a.ii(3) Environmental Justice

2.a.ii(3)(a) Identification of Environmental Justice Issues: EPA's EJScreen tool was used to evaluate the Strawberry Hill TA for environmental justice (EJ) indices (presented in **Table 3**). The percentiles for the four EJ indices for which data were provided ranged from the 76th to the 98th percentile relative to other areas in Alaska, indicating a disproportionate pollution burden or vulnerability to pollution for residents in the Strawberry Hill TA. The intensive historical military and industrial uses have resulted in cumulative environmental impacts. 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.

Table 3: EJScreen Indices for Strawberry Hill TA[12]

EJ Indices	Percentile in AK
NATA Diesel Particulate Matter	**80%**
Toxic Releases to Air	**76%**
Lead Paint Indicator	**94%**
Risk Mgmt. Program (RMP) Facility Proximity	**98%**
Hazardous Waste Proximity	*Not Available*
Underground Storage Tank Proximity	63%

***Red font** = EJ Index >75th Percentile.*

Table 4: CEJST Indices for Strawberry Hill TA [13]

Category	Disadvantaged Indices	Percentile in US
Demographics	Minority Population	77%
Demographics	Asian Population	47%
Housing	Lack of Indoor Plumbing	96%
Legacy Pollution	FUDS	Yes
Legacy Pollution	Proximity to RMP Facilities	92%
Workforce Development	Linguistic Isolation	80%
Workforce Development	High School Education (pop. ≥25 years old with less than high school diploma)	10%

It should be noted that the EJSCREEN tool fails to highlight the full scope and scale of environmental injustices to which the Unangan people have been subjected. The injustices reached a pinnacle during WWII when the native residents were forced from their homes and placed in internment camps for three years while their land was seized by the US military, their possessions scattered, and their villages burned and bulldozed (together with hundreds of archaeological sites) and replaced with US Army and Navy facilities. Ten percent of the villagers died in internment. When some of the lands were

[7] Robert Wood Johnson Foundation. County Health Rankings & Roadmaps. *2023 County Health Rankings for Aleutians West, Alaska.* Link.
[8] *Alaska Native Tribal Health Consortium, Epidemiology Center. Cancer in Alaska Native People, 1969-2018, the 50-Year Report (2021).*
[9] *AK Division of Public Health, AK Birth Defects Registry Table C-58.*
[10] *Parkinson's disease among American Indians and Alaska natives: A nationwide prevalence study.*
[11] CDCP PLACES: Local Data for Better Health. Health Rankings for City of Unalaska, Alaska. Link.
[12] Generated using EPA Environmental Justice Screening (EJSCREEN) Tool on 10/28/23. Data represents Strawberry Hill TA (CT #02016000200).
[13] Generated using Climate and Economic Justice Screening Tool (CEJST) on 10/28/23. Data represents Strawberry Hill TA (CT #02016000200).

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 program within DERP, after nearly 40 years of assessment and cleanup, only 34 of the 102 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.[14] The lack of progress in assessing the FUDS continues to negatively impact the OC, Q-Tribe and Unalaska community as a whole. It contributes to ongoing challenges in building housing, and in developing OC's land for uses that could enhance the quality of life, create economic opportunities, and improve access to healthcare.

The Aleutians West CT is located within a disadvantaged CT according to the Climate and Economic Justice Screening Tool (CEJST).[15] According to CEJST, the Alaska Native Villages in this CT that are Federally Recognized are considered disadvantaged. This includes OC's land and the Q-Tribe. **Table 4** illustrates the sensitive populations identified in CEJST and the seven indicators flagged by the database that make it a disadvantaged CT.

2.a.ii(3)(b) Advancing Environmental Justice: The EPA Grant will be used to cleanup Strawberry Hill, which is considered to be strategic based on its potential for near-term redevelopment for quality affordable housing and a hospital. As previously mentioned in Section 1.b.i, this site was ***identified by residents as one of their top ten redevelopment priorities in the 2020 Comprehensive Plan.*** Cleanup of SHL will not displace any residents or businesses and will significantly advance EJ among a disadvantaged community. Specifically, the community suffers from lack of healthy housing and has significant exposure to asbestos and LBP (see **Table 3**) and falls in the 96th percentile in the US for lack of indoor plumbing (see **Table 4**). Strawberry Hill is one of the only developable areas of Unalaska that is served by utilities and can support multi- and single-family housing development. Providing affordable, healthy homes is critical to protecting the health and welfare of this underserved community. Additionally, the proposed hospital project for Strawberry Hill 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 emergency care service is a significant EJ issue impacting the community as the limited care results in pregnant women leaving their families behind during their last month of pregnancy to live in Anchorage as they await delivery. Additionally, 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 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 will work in tandem to provide workforce housing that will attract and retain talent to the island and also provide much needed medical services.

2.b. Community Engagement

2.b.i. Project Involvement / 2.b.ii. Project Roles: Below we identify six partners that will play significant roles in implementing the grant and helping to achieve the desired reuse goals. Representatives from each will serve on a Brownfields Advisory Committee (BAC) that is being formed in support of OC's FY2023 EPA Brownfield CWA Grant for Tribes. The BAC will be used to coordinate work on the grant as well as to provide the partners with meaningful involvement in decision making with respect to site cleanup and reuse planning.

- **Q-Tribe** (Chris Price, CEO, environmental.qtribe@gmail.com): The Q-Tribe will be an essential partner throughout the project. Their involvement will include serving on the BAC, providing technical support for assessment and cleanup activities. They will assist in performing community outreach to Tribal members. They will continue to provide support in pursuing and securing funding needed to advance the priority projects on OC lands. Rachel Lekanoff, their Environmental Remediation Coordinator, will support project activities on an as needed basis through an employee sharing agreement.
- **City of Unalaska** (Bil Homka, City Manager, bhomka@ci.unalaska.ak.us): The City has committed to serving on the BAC, providing assistance from their geographic information system (GIS) staff, and supporting outreach. The City will 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)** (Alyssa Schwary-McDonald, [redacted]): Participation by USACE will occur through their 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 SHL is a FUDS. In order to better coordinate cleanup activities performed using the EPA Grant with on-going work through the FUDS Program, we plan to schedule the BAC meetings on the same dates as the quarterly meetings of the RAB held in Unalaska. This will facilitate participation by individuals who are serving on both the RAB and BAC.
- **Museum of the Aleutians (MOTA)** (Dr. Virginia Hatfield, Director, director@aleutians.org): The MOTA will participate on the BAC and help with site prioritization beyond this cleanup grant, community outreach, and help host regular public meetings. Staff from MOTA have some of the greatest local knowledge and expertise related to historic and archaeological sites, and will be key to planning work in compliance with National Historic Preservation Act (NHPA)

[14] *Division of Spill Prevention and Response (alaska.gov). Accessed 10/28/23.*
[15] Generated using Climate and Economic Justice Screening Tool (CEJST) on 10/28/23. Data represents Strawberry Hill TA (CT #02016000200).

requirements and in responding to inadvertent discoveries of human remains, funerary objects, sacred objects, or objects of cultural patrimony that are encountered during cleanup and redevelopment activities.

- **Iliuliuk Family and Health Services (IFHS)** (Noel Rea, CEO, nrea@ifhs.org): The IFHS is the primary health service provider in Unalaska. They will serve on the BAC and have input 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** (Lorie Jackson, Medical Director, Oonalaska Wellness Center, loriej@apiai.org): The APIA is a non-profit focused on advancing the economic, health, social and cultural development of residents throughout the Aleutian Islands. Their programs include the operation of health clinics, alcohol counseling centers, public safety, environmental, elderly, nutrition, education, social and welfare services, and child protection. They operate a Wellness Center in Unalaska, and opened a new $8.4M Head Start program facility constructed on an OC-owned brownfield site within the **Strawberry Hill TA**. They led past efforts to bring a regional hospital to the City and are expected to be a key partner for continuing efforts. They will serve on the BAC and provide input on cleanup and reuse planning – in particular as these relate to their programs.

2.b.iii. Incorporating Community Input: OC relies on collaboration to further its mission, and understands effective engagement is imperative to the success of this project. OC will work closely with its partners to connect with stakeholders and solicit input from them and the community on site selection, assessment, and reuse planning. At the beginning of the project, OC will prepare a Community Involvement Plan (CIP) that will include the following components:

- **Project Webpage**: OC is currently creating a brownfield webpage on its website to feature information about our FY2023 CWA Grant. The website will include fact sheets, links to resources, regular updates, and opportunities to provide feedback. Information about the Cleanup Grant will be added to this webpage and the Q-Tribe's brownfield webpage.
- **Brownfield Advisory Committee (BAC)**: As discussed in Section 2.b.i/ii, OC will host quarterly BAC meetings (in support of its CWA Grant) that will coincide with the dates of meetings of the USACE RAB to solicit input on site prioritization/cleanup/reusing planning. These meetings will also be used to discuss and strategize on cleanup and reuse planning activities at SHL. The City and Q-Tribe also assist OC with outreach and public education.
- **Social Media**: OC and its partners have established social media channels 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) that are sent by mail and email to shareholders and tribal members. These newsletters regularly feature updates on environmental programs, and will be used to provide updates and solicit input throughout the project. OC is also adding a column to the newsletter for updates related to their FY23 CWA Grant project and this Cleanup Grant project.
- **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 is again relying on in person meetings 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 input into all phases of work. Sustained outreach will ensure the project concludes with strong community backing. Finally, OC and its partners have access to translation resources and interpreters that will be made available for meetings.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS:

3.a. Proposed Cleanup Plan: The project will remove ACM debris and contaminated soil from SHL and transport it off-island. The Analysis of Brownfield Cleanup Alternatives (ABCA) provided in Attachment E presents three cleanup alternatives with Alternative #3 being the preferred cleanup method of OC and ADEC. Alternative #3 includes remedial design investigation, excavation, removal and off-site disposal of ACM debris and contaminated soil (estimated to be up to 800 tons). This alternative includes a Remedial Design investigation to evaluate the landfill limits and collection of waste characterization samples, plus the excavation, removal and off-Site disposal of the landfill contents. Site restoration would consist of importing clean backfill, installation of a stone lined surface swale for conveyance of the creek headwaters, placement of topsoil and grass seed. Since the landfill contents will be completely removed, recording of institutional controls and deed restrictions, and long-term (30 years) maintenance and monitoring will not be required with this alternative.

3.b. Description of Tasks/Activities & Outputs: We expect the scope below to be ***completed within two years.***

Task 1: Project Management, Reporting & Other Eligible Activities
i. Project Implementation: Task 1 will include: 1) general Cooperative Agreement (CA) compliance oversight; 2) quarterly progress reporting; 3) annual Disadvantaged Business Enterprise (DBE) report and 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; and 7) participation in national and regional brownfield conferences.
ii. Project Schedule: Activities will be ongoing throughout the project period (which we anticipate will be 2 years).
iii. Task Lead: OC with support from the Qualified Environmental Professional (QEP) Contractor.
iv: Output(s): 8 Quarterly Reports; 2 Annual FFR and DBE Reports; prompt ACRES reporting; 1 Final Performance Report and associated financial documents; 2 brownfield conferences attended by 2 OC staff; and 48 check-in meetings with QEP Contractor (24 meetings/year x 1 hr/meeting x 2 years).
Task 2: Community Engagement
i. Project Implementation: A detailed description of the planned methods for involving and informing the public is provided in Section 2.b. This task includes: 1) preparing an initial CIP; 2) organizing and hosting 4 BAC meetings/year; 3) organizing and hosting 2 public meetings/year; 4) preparation of fact sheets and press releases; 5) creation/posting of regular updates to a project/brownfields webpage on the OC website.
ii. Project Schedule: The CIP, project webpage and fact sheets will be completed by the second quarter (2Q) of the project. Two community meetings will be hosted per year with the first during 2Q. BAC meetings will be held quarterly to coincide with RAB meetings (described in Section 2.b.iii).
iii. Task Lead: OC with support from the QEP Contractor.
iv: Output(s): CIP. 4 BAC meetings/year, 2 public meetings/year and meeting materials. 2-3 project fact sheets. Project posters. Mailers. Public notices published in the local newspaper and OC website. Develop and update/maintain project webpage on OC's website.
Task 3: Remedial Activities
i. Project Implementation: Property cleanup/cleanup planning will include: 1) Endangered Species Act (Section 7) and National Register of Historic Places (Section 106) consultations; 2) Develop Quality Assurance Project Plan (QAPP); 3) Remedial Design Investigation; 4) finalize the ABCA; 5) Develop a Remedial Action Work Plan (RAWP); 6) QEP oversight of remedial activities (including a Davis-Bacon Act [DBA] and EPA compliant (2 CFR § 200.317-326) request for quotation process to secure cleanup and waste transportation contractors); 7) implement the cleanup plan described in 3.a, including all permitting and pre-work submittals, Health and Safety Plan (HASP) preparation, controls to secure the site, and remove, load, transport and dispose of ACM debris and contaminated soil; importing clean backfill, installation of a stone lined surface swale for conveyance of the creek headwaters, placement of topsoil and grass seed; 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.
ii. Project Schedule: Year 1: Items 1-5 described above will be completed. Year 2: Items 6-8 will be completed.
iii. Task Lead: QEP Contractor under the direction of OC.
iv: Output(s): Section 7 and Section 106 Consultations, Site-specific QAPP, HASP, Final ABCA, Remedial Action Work Plan, Cleanup Specifications, DBA Compliance Documentation, Site Cleanup, Closure Report.

3.c. Cost Estimates: Below we provide cost estimates by task. OC personnel costs are based on an average rate of $100/hour ($65 personnel salary + $35 fringe benefits). OC is requesting 1.5% of the grant for indirect costs ($10K per task) for administrative expenses. No other administrative expenses are requested. QEP Contractor costs are based on an average rate of $200/hour. Approximately ***91% of grant funds ($1.82M 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 = $89,000 ($79,000 Direct + $10,000 Indirect)
Personnel & Fringe Total = $28,000 • CA Management, Contractor Management & Reporting Activities: $4,000 (40 hours x $100/hr) • Biweekly Project Meetings: $14,400 (24 meetings/yr x 1 hour/meeting x 2 years x 3 staff = 144 hours x $100/hr) • Brownfields Conference Attendance: $9,600 (8 hours/day x 3 days x 2 events x 2 staff = 96 hours x $100/hr)
Travel Total = $15,000 • National Brownfields Conference: $9,400 ($4,700/person x 2 OC staff x 1 conference) • State Brownfields Conference: $5,600 ($2,800/person x 2 OC staff x 1 conference) *(Note: Costs include airfare, lodging, meals, transportation, and incidental expenses. Costs may seem higher than average due to the $2,000 cost of a roundtrip ticket from Unalaska to Anchorage. State conferences are hosted in Anchorage and flights for out-of-state conferences connect in Anchorage.)*
Other Total = $800 (Conference Registration Fees [$200/person x 2 OC staff x 2 conferences])
Contractual Total = $35,200 • Compliance Reporting (Quarterly Progress Reports, ACRES updates, Final Performance Report, Annual FFRs & DBE Utilization Reports): $16,000 (80 hours x $200/hr) • Biweekly Project Meetings: $19,200 (24 meetings/yr x 1 hour/meeting x 2 years x $200/hr x 2 staff [1 QEP & 1 Contractor])
Task 2: Community Engagement | Total Budget = $63,500 ($53,500 Direct + $10,000 Indirect)
Personnel & Fringe Total = $18,000

- Review CIP & Project Fact Sheets; Develop/Maintain Project Webpage; Outreach: $10,800 (108 hours x $100/hr)
- Community Meetings & BAC Meetings: $7,200 (6 meetings/yr x 3 hours/meeting x 4 staff = 72 hours x $100/hr)

Supplies Total = $3,500 (Cost for printing mailers, posters and meeting materials.)

Contractual Total = $32,000

- Develop CIP, Project Fact Sheets & Project Webpage Content: $8,000 (40 hours x $200/hr)
- Community Meetings & BAC Meetings: $24,000 (120 hours x $200/hr)

Task 3: Remedial Action | Total Budget = $1,847,500 ($1,837,500 Direct + $10,000 Indirect)

Personnel & Fringe Total = $6,000

- QEP/Contractor Coordination & Oversight: $6,000 (60 hours x $100/hr)

Contractual Total = $197,612

- Section 106 & 7 Consults: $12,000 (60 hours x $200/hr)
- Finalize ABCA: $6,000 (30 hours x $200/hr)
- Site-Specific QAPP: $10,000 (50 hours x $200/hr)
- Remedial Action Work Plan: $18,000 (90 hours x $200/hr)
- Remedial Design Investigation: $107,612
- Contractor Oversight: $20,000 (100 hrs x $200/hr)
- Construction Completion Report: $24,000 (120 hrs x $200/hr)

Construction Total = $1,622,388

- Remedial Action: $1,236,788
- Waste Transport: $281,600
- Waste Disposal: $104,000

Supplies Total = $1,500 (Cost for required signage at cleanup sites.)

Other Total = $10,000 (ADEC fees.)

A summary of the proposed budget for grant funded activities is provided in the table below.

Budget Category	Task 1 Project Mgmt., Reporting & Other Eligible Activities	Task 2 Community Engagement	Task 3 Cleanup Planning & Implementation	Total
Personnel	$18,200	$11,700	$3,900	**$33,800**
Fringe Benefits	$9,800	$6,300	$2,100	**$18,200**
Travel	$15,000	$0	$0	**$15,000**
Equipment	$0	$0	$0	**$0**
Supplies	$0	$3,500	$1,500	**$5,000**
Contractual	$35,200	$32,000	$197,612	**$264,812**
Construction	$0	$0	$1,622,388	**$1,622,388**
Other	$800	$0	$10,000	**$10,800**
Total Direct Costs	$79,000	$53,500	$1,837,500	**$1,970,000**
Total Indirect Costs	$10,000	$10,000	$10,000	**$30,000**
TOTAL BUDGET	**$89,000**	**$63,500**	**$1,847,500**	**$2,000,000**

3.d. Plan to Measure & Evaluate Environmental Progress & Results: Upon notice of award, a project schedule will be prepared with tasks, subtasks, milestones, and reporting requirements specific to the EPA Grant, including the outputs associated with each task as detailed in Section 3.b. This schedule will be reviewed on a biweekly basis throughout the project to identify any deviations as soon as they occur so corrective measures can be developed and implemented. Copies of the updated schedule will be included with each Quarterly Report submitted to EPA. All project outputs are listed in Section 3.b. The overall project result anticipated cleanup of a 1-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 SHL must be completed. Eventual project outcomes, and the units that will be used to measure them include: (1) Total acres of Strawberry Hill 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 for cleanup and redevelopment. All outputs and outcomes will be reported in ACRES.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Structure / 4.a.ii. 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, as well as relying on our nearly 50-years of organizational experience in managing, developing, and coordinating the cleanup and reuse of our lands. As is standard for all their projects, OC will employ a 3-person management team and ensure roles and responsibilities are clearly defined from the start. The Project Manager Natalie Cale, Assistant Project Manager Denise Rankin, and Project Coordinator Donna Van Flein, will lead all grant activities with support from other OC staff, project partners and the QEP. As described in Sections 2.b and 3.b, a BAC will be established to assist in implementation of the grant. The BAC will assist with community outreach and reuse planning. The QEP team will be responsible for implementation of technical activities and compliance reporting to EPA under the direction of OC. We will work closely with Q-Tribe staff throughout the project, in particular Rachel Lekanoff, who leads the Tribe's environmental

response programs and who will assist this project as needed through an employee sharing agreement. 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. Collaboration with the Q-Tribe and City will be facilitated through the trilateral agreement, and coordination with USACE through the alignment of our quarterly BAC meetings with the quarterly USACE RAB meetings. Key OC staff and their roles are described below:

- **Project Manager – Natalie Cale, Chief Executive Officer (CEO)/General Counsel**: In addition to CEO and General Counsel for OC, Natalie is also a Director on the Ounalashka/Chena Power, LLC Board (OCCP), the entity responsible for completion of the $250M Makushin Volcano Geothermal project. She has worked on legal issues relating to OC's contaminated lands since 2001. She also led the formation of OC Environmental Services, LLC (OCE), a certified 8(a) environmental remediation company, and serves as the project manager for a cleanup of eight sites in Unalaska Valley. She has significant experience applying for and/or managing major federal grants, including the CARES Act Relief Fund Program for OC and its shareholders, a $37M award to the Alaska Federation of Natives, and assisting with the successful application for the $22.3M RAISE grant. Natalie serves on the ANVCA Legislative Committee overseeing the Contaminated Lands section, and was instrumental in advocating for US Senator Lisa Murkowski, EPA, BLM, DOD and DOI to conduct a Field Hearing in Unalaska on 8/23/2022, focused specifically on accelerating cleanup of contaminated lands.
- **Assistant Project Manager – Denise Rankin, President, Property and Leasing Manager**: Denise has been an employee of OC for nearly 25 years, serving in many roles. As the property and leasing manager, she has detailed knowledge of OC lands and of challenges incurred in leasing and developing these parcels. She has had extensive involvement with the community, having served as the Q-Tribal President, and on community boards and the school board. Denise assists with oversight of all assessment and cleanup projects for OC.
- **Project Coordinator – Donna Van Flein, Corporate Affairs Coordinator**: 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 shareholder outreach through coordination of the quarterly OC newsletter as well as planning, organizing and facilitating OC's 50th Anniversary Annual Shareholder Meeting and Banquet in Unalaska this past summer.

4.a.iii. 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 retain a QEP and remediation contractor team to support project management and all technical aspects of the project. 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 size of the project and 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.

Given the remoteness and unique conditions of the project area, OC makes an effort to prioritize local hiring whenever feasible. 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 to the success of our projects that we use local contractors with a history of successful project performance on the island. OC notifies local contractors of procurement opportunities via direct email, Facebook announcements, and announcements at bimonthly community meetings held in support of other projects. These practices will be applied to this project.

4.b. Past Performance & Accomplishments / 4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: OC received a $2M FY2023 EPA Brownfield Community-Wide Assessment (CWA) Grant for Tribes.

4.b.i.(1) Accomplishments: The CWA Grant project started on 10/01/2023. OC completed its Cooperative Agreement (CA) Work Plan on time and is currently in the process of procuring QEP services. Pre-award funds were used for two OC staff (Natalie Cale and Donna Van Flein) to attend the National Brownfields Conference in Detroit in August 2023. Since the project just started on 10/01/23, no sites have been assessed to date but several sites have been prioritized and the following outputs are planned: 12 Phase I & II ESAs, 4 RBM Surveys, 6 Cleanup Plans, 3 Reuse Plans, 3 Infrastructure Studies, 2 Market Studies, and one area-wide plan. OC has a Master QAPP recently prepared for their EPA Contaminated ANCSA Lands Grant that will be adapted for the CWA project in fall 2023. Fieldwork will begin as soon as feasible (likely April 2024) dependent upon weather conditions. The infrastructure study is anticipated for spring/summer 2024.

4.b.i.(2) Compliance with Grant Requirements: OC has successfully complied with the terms and conditions of all grant projects. Due to OC's excellent project and grant management efforts, no corrective measures have been required. All deliverables required to date for the CWA Grant (pre-award compliance reviews and CA Work Plan) have been completed on time and expected results were achieved. Furthermore, the OC has an excellent track record of adhering to project work plans, schedules, budgets, and terms/conditions on all grant projects. OC is committed to completing compliance reporting on time and in accordance with EPA requirements. OC has worked with community stakeholders to confirm the priority sites to be assessed with grant funds and expects to complete this project within three years (well ahead of the five-year timeline).

THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

610 University Ave
Fairbanks, AK 99709
www.dec.alaska.gov

November 8, 2023

Via Electronic Mail Only

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

RE: State Environmental Authority Letter and Site Eligibility, Strawberry Hill Landfill

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 2024 Brownfields Cleanup Grant application to the United States Environmental Protection Agency (EPA).

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

Per EPA's FY24 Guidelines for Brownfield Cleanup Grants, this letter establishes that this site is currently part of DEC's voluntary response program. The DEC 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, we consider any site addressed through CSP to be within our voluntary response program. This designation includes the Strawberry Hill Landfill site, as DEC has been working with the Ounalashka Corporation to investigate and plan for cleanup activities at this property.

Furthermore, the Ounalashka Corporation has previously applied for and was awarded 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. Throughout these interactions, DEC found 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, we note that 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. Strawberry Hill Landfill 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. Previous site assessment activities included a Site Investigation (SI)/Remedial Investigation (RI)/ Interim Removal Action (IRA) conducted in 1998 that included RI activities at the Strawberry Hill site. The RI included advancing three soil borings, installing three monitoring wells, and collecting a surface water sample to assess potential landfill impacts to surrounding groundwater and surface water. Elevated levels of metals such as iron, lead, and arsenic were observed in the samples. DEC certifies that this level of investigation provides a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work envisioned at this site. The full report and other reporting on the site can be found in the site record for the Strawberry Hill Landfill on the DEC Contaminated Sites Database.

This letter establishes the Ounalashka Corporation's compliance with the requirements for EPA Brownfield Cleanup Grants. We wish the Ounalashka Corporation well on its pursuit of EPA assistance and success in addressing the Strawberry Hill Landfill site.

Please contact me directly at (907) 451-2181 or cascade.galasso-irish@alaska.gov, if we can be of any further assistance.

Sincerely,

Cascade Galasso-Irish
Environmental Program Manager

Electronic cc: Marc Thomas, ADEC
Madison Sanders-Curry, U.S. EPA
Terri Griffith, U.S. EPA
Andrea Pederson, Montrose Environmental