“Enhancing” a Tribal Response Program

CERCLA 128(a) Tribal Response Programs
How do we “enhance” the TRP?

Where do we go next?
What can I cleanup now?

Can you get me a bigger bone?
“Under CERCLA 128(a), “enhance” is related to activities that add to or improve a state or tribal response program or increase the number of sites at which response actions are conducted under a state or tribal response program”*

*Annual EPA HQ STRP Guidance
What does “enhance” mean?

“The exact “enhancement” uses that may be allowable (read “grant fundable”) depend upon the work plan negotiated between the EPA Regional office and the tribe.”*

*Annual EPA HQ STRP Guidance
What are “enhancements”?

**EXAMPLES:**

- **Training** to improve knowledge & skills of TRP staff; and developing better coordination and understanding of other response programs (e.g. RCRA or LUST/UST)
- **Outreach** to increase awareness and knowledge of TRP activities and goals
- **Assessing & cleaning up** more types of sites
Don't get your signals crossed...

Review the status of your TRP to know where you are & where you are going.
A) What current issues or priorities does the tribe need to address through this program?

B) What are the issues or priorities to be addressed short term or long term?

C) What existing tribal laws, codes or policies are now in place and what improvements or additions are needed?

D) What improvements are needed or gaps exist in the current tribal TRP (4 Elements & P.R.)?

E) What are the tribe’s future issues, priorities and goals?
Talk to EPA

Review the current status of your 128(a) Tribal Response Program and what has been accomplished. What does EPA recommend is needed to improve your TRP?

ALSO:

- Review the latest Annual U.S. EPA State and Tribal Response Program Guidance (HQ & Region)
- Talk to other Tribes with the TRP
Assess your Tribe’s current and future needs and how it can best utilize the TRP
Identify your most obvious problems.
Enhancing the 4 Elements of the TRP
How do I “enhance” the 4 Elements?

Can you “enhance” my dinner?
Element 1

Survey & Inventory
Element 1: Survey & Inventory

Has your perspective changed on what is a “brownfield” on your tribal lands?

Have you revisited known sites or other other sources of information?

Have you researched ALL available information?
Interview elders & other community members
Sources of Brownfield Info.

• Interviews of former workers and maintenance staff of potential brownfields buildings to obtain historical and maintenance information on specific sites.
• Reports from community members (verbal, web site, report form)
• Use of tribal GIS and mapping records.
• Tribal Land/Property office: newly abandoned properties (farms, ranches or bldgs.) or potential future acquisitions?
Sources of Brownfields Info.

- Field survey of tribal lands (go look again!)
- Review of existing inventories, reports or databases such as:
  - UST/LUST inventories
  - Open Dump Surveys (IHS, EPA)
  - Abandoned Mine Inventory (states/USGS)
- Insurance maps
- Old topographic and soil survey maps and aerial photos
Sources of Brownfield Info.

- RCRA treatment, storage & disposal facility lists (updated?)
- US EPA CERCLA/Superfund PA & RI/FS Reports (updated?)
- Oil & gas well inventories (BLM, USGS, State)
- State or near-by county/community brownfield inventories (104 Grants)
- EPCRA Reports and Notifications
Inventory of Brownfields in remote areas

Snow-machines are a winter transportation means.

Two seater Super Cub on floats.

Skiffs are common transportation during ice free months.

Father and son dog musher at Koliganek.
<table>
<thead>
<tr>
<th><strong>Date:</strong></th>
<th><strong>Updated:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Form completed by:</strong></td>
<td><strong>Site Name</strong></td>
</tr>
<tr>
<td><strong>Directions to site:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Site Description:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Address:</strong> (county/state):</td>
<td></td>
</tr>
<tr>
<td><strong>Lat/Long:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Township/Range/Section:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Parcel/Allotment Number(s):</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Current Property Status/Owner:</strong> Tribal  ___  Trust ___  Fee___  Federal___  Other___</td>
<td></td>
</tr>
<tr>
<td><strong>Current Use of Property:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Future Use of Property:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Neighborhood:</strong> Residential  ___  Industrial  ___  Rural  ___  Other ___</td>
<td></td>
</tr>
<tr>
<td><strong>Site &amp; Vicinity general characteristics:</strong> (terrain, elevation, general land use in area, vegetation, location to nearest town)</td>
<td></td>
</tr>
<tr>
<td><strong>Physical setting:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Geologic Information:</strong> - geological formations/thickness - bedrock name/depth - faults/structural features - (within 4 miles)</td>
<td></td>
</tr>
<tr>
<td><strong>Hydraulic Information:</strong> - depth to groundwater - aquifers under site - hydraulic conductivity - confined/unconfined - recharge area - interconnections</td>
<td></td>
</tr>
<tr>
<td><strong>Hydrology:</strong> - surface water flow direction - annual mean discharge rate of surface water - drainage area up-gradient of site - floodplain information - wetlands or water bodies</td>
<td></td>
</tr>
<tr>
<td><strong>Historical Information:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Property use Past/Present:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Previous owner:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Potential environmental threats:</strong></td>
<td></td>
</tr>
</tbody>
</table>
Kansas State University

{Blase Leven}

Technical Assistance to Brownfields (TAB)

**Brownfield Inventory Tool (BIT)**

{available on-line or a PC version}

http://tab-bit.org/
Site Prioritization

• Do you have a prioritization process for site work?
• Does it need to be reviewed, updated or revised?
• Is the community involved in that process?
• Does it reflect new or changing issues or concerns?
• Have you included all parts of the community and/or Reservation?
## PRIORITIZING BROWNFIELD SITES FOR FURTHER ACTION

<table>
<thead>
<tr>
<th>Ranking Factor</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>Total Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human Exposure</td>
<td>Contamination pathways have no direct impact on any population.</td>
<td>Contamination pathways have potential to affect human recreational activities.</td>
<td>Contamination pathways have the potential to affect employee population.</td>
<td>Contamination pathways have the potential to affect a small residential population.</td>
<td>Contamination pathways have the potential to affect an entire residential population.</td>
<td></td>
</tr>
<tr>
<td>Environmental Exposure</td>
<td>Site not located near environmentally sensitive areas.</td>
<td>Site located within a mile of an environmentally sensitive area.</td>
<td>Site located within a 1/2 mile of an environmentally sensitive area.</td>
<td>Site located within environmentally sensitive area.</td>
<td>Site located immediately in environmentally sensitive area (RECs).</td>
<td></td>
</tr>
<tr>
<td>Ecological Exposure</td>
<td>No exposure to endangered or threatened species habitat areas.</td>
<td>Potential exposure to endangered or threatened species habitat areas.</td>
<td>Potential exposure to critical habitats of endangered or threatened species habitat areas.</td>
<td>Actual known releases of hazardous substances in endangered or threatened species habitat areas.</td>
<td>Actual known releases of hazardous substances in critical area of endangered or threatened species habitat areas.</td>
<td></td>
</tr>
<tr>
<td>Cultural Sensitive Area</td>
<td>Potential area not located within a culturally significant area.</td>
<td>Potential area within a 5 mile radius of a cultural significant area.</td>
<td>Potential area within a 1 mile radius of a cultural significant area.</td>
<td>Potential area adjacent to a cultural significant area.</td>
<td>Potential area in immediate cultural significant area.</td>
<td></td>
</tr>
<tr>
<td>Potential for Beneficial Site Redevelopment</td>
<td>No site development.</td>
<td>Low likelihood of site redevelopment.</td>
<td>Moderate potential for redevelopment.</td>
<td>High potential for site redevelopment.</td>
<td>Redevelopment plan ready, waiting for site to be re-mediated to begin redevelopment</td>
<td></td>
</tr>
<tr>
<td>Creation of Jobs</td>
<td>No increase of jobs.</td>
<td>1 to 5 new jobs created.</td>
<td>5 to 10 new jobs created.</td>
<td>10 to 20 new jobs created.</td>
<td>More than 20 jobs created.</td>
<td></td>
</tr>
<tr>
<td>Land Ownership Status</td>
<td>Allotted Land</td>
<td>Fee Land within boundaries of Reservation (Tribal Land taken out of trust).</td>
<td>State Land (school sections)</td>
<td>Sub marginal Lands (purchased land outside of reservation boundaries)</td>
<td>Tribal Owned/Reserve (Held in trust for tribal Government)</td>
<td></td>
</tr>
</tbody>
</table>

Total Cumulative Points
### Insert points for all factors that apply

<table>
<thead>
<tr>
<th>Factors</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Human Exposure to contaminant(s) – if residential (5-points)</td>
<td></td>
</tr>
<tr>
<td>Potential Human Exposure to contaminant(s) – if worker (3-points)</td>
<td></td>
</tr>
<tr>
<td>Potential Human Exposure to contaminant(s) – if recreational (3-points)</td>
<td></td>
</tr>
<tr>
<td>Potential ecological exposure to contaminant(s) (5-points)</td>
<td></td>
</tr>
<tr>
<td>High toxicity potential to humans (5-points)</td>
<td></td>
</tr>
<tr>
<td>Medium toxicity potential to humans (4-points)</td>
<td></td>
</tr>
<tr>
<td>Low toxicity potential to humans (3-points)</td>
<td></td>
</tr>
<tr>
<td>High potential for reuse (5-points)</td>
<td></td>
</tr>
<tr>
<td>Medium potential for reuse (3-points)</td>
<td></td>
</tr>
<tr>
<td>Low potential for reuse (1-points)</td>
<td></td>
</tr>
<tr>
<td>No potential for reuse (0-points)</td>
<td></td>
</tr>
<tr>
<td>Reuse creates many jobs (5-points)</td>
<td></td>
</tr>
<tr>
<td>Reuse creates some jobs (3-points)</td>
<td></td>
</tr>
<tr>
<td>Reuse creates no jobs (0-points)</td>
<td></td>
</tr>
<tr>
<td>Mitigation costs low (5-points)</td>
<td></td>
</tr>
<tr>
<td>Mitigation costs medium (3-points)</td>
<td></td>
</tr>
<tr>
<td>Mitigation costs high (1-points)</td>
<td></td>
</tr>
<tr>
<td>Funding identified (5-points)</td>
<td></td>
</tr>
<tr>
<td>Partial funding identified (3-points)</td>
<td></td>
</tr>
<tr>
<td>Existing utilities (1-3 points)</td>
<td></td>
</tr>
<tr>
<td>Cultural considerations (5-points)</td>
<td></td>
</tr>
<tr>
<td>Reuse creates public amenities (5-points)</td>
<td></td>
</tr>
<tr>
<td>Removes eyesore (1-point)</td>
<td></td>
</tr>
<tr>
<td>Located near disadvantage community (1-point)</td>
<td></td>
</tr>
<tr>
<td>Tribal Council/Administration designates site a high priority (5-points)</td>
<td></td>
</tr>
<tr>
<td><strong>Total Points</strong></td>
<td></td>
</tr>
</tbody>
</table>
Element 2

Oversight & Enforcement
TRP Element 2: Tribal Response Role

This Element has two parts:

1) Development of oversight and enforcement authorities or other mechanisms and resources; and

2) Ensuring that response actions or cleanups conducted under this program are adequate and completed.
“Other Mechanisms”

Element 2 also mentions the use of “other mechanisms, and resources”.

These may be other authorities or resources that could be brought to bear on a situation to ensure that a party meets their obligations.
Port Heiden, AK

USAF DEW Line Site
AKA “Port Heiden Radio Relay Station”
Native Village of Port Heiden, AK TRP
USAF Funding Site Specific Activities

TRP Conducting:
- Site Sampling
- Cleanup & Verification
Tribal Response Enforcement

U.S. EPA: Eligible grant activities include, but are not limited to, development of legislation, regulations, procedures, ordinances, guidance, etc. that would establish or enhance the administrative and legal structure of their response programs.
Tribal Civil Enforcement

- Have existing Tribal laws, codes or ordinances been properly adopted and recorded?
- Do you need to develop more civil compliance and enforcement authorities, policies and procedures for the response program?
- Are there still gaps in the Tribal laws, codes and ordinances or new issues to be addressed?
- Do you need more compliance and enforcement training?
Do Tribal Solid & Hazard Waste Laws/Codes include all Tribal Response Program Requirements?

- Responses to releases
- Oversight of responses
- Conducting responses
- Cleanup Standards
- Verification & Certification
- Institutional Controls
- Public Participation
Tribal Laws & Codes

• Improved internal procedures, policies and protocols needed to implement Tribal laws, codes and ordinances? (a SOP)
• Are there new Federal or State laws/regs. that need to be considered and perhaps added to tribal laws & codes? (e.g. EPA Lead Paint Rules)
• Other benefits of enforcement?
Tribal Cleanup Process

Has your Tribe developed a model cleanup plan and process that can be imposed and enforced when a cleanup is conducted under tribal authority and jurisdiction?

{This is also addressed under Element 4}
Equipment Needs

In order to “Enhance your Program” do you need:

• Communications equipment
• Camera or GPS
• Field gear/clothing
• Safety gear/clothing
• Computer equipment or software
• Technical guidance or manuals
• Sampling or testing equipment/capabilities
• Secure equipment cabinet
QAPPs

Has your Tribe developed any model or generic Quality Assurance Project Plans? Some types of sites and contaminants are encountered repeatedly such as:

✓ Asbestos
✓ Lead paint
✓ Petroleum releases from USTs
✓ Other?

This can reduce time & costs in the future
Data Mgt. and Quality

Has your Tribe developed a Data Quality Mgt. Plan (QMP)? This can include:

- Tribal roles and responsibilities
- Data format & reporting requirements
- Technical & other information requirements
- Internal and external (EPA) review steps
- Filing and record keeping

**NOTE: This NOT the QAPP!**
Learning Opportunities

Have you taken advantage of learning from others?

• Assisting U.S. EPA staff in planning and conducting cleanups under RCRA, CERCLA and LUST.

• Review and comment on cleanup plans developed by other federal and state agencies. (e.g. Army COE, DOD and DOE)

• Accompany and/or oversee a contractor that is conducting an assessment or a cleanup
Tribal Cleanup Funding

Has your Tribe explored means to establish an emergency or environmental response fund?

➢ Permit fees?

{e.g. a 1% of total major construction or demolition contract for solid waste management permit fee}

➢ Oversight/review fees?

➢ Funds from fines?

➢ Tribal Cost Recovery?

➢ Other?
Kansas State University
Technical Assistance to Brownfields (TAB)
Brownfield Inventory Tool (BIT)
Includes Compliance & Enforcement tracking!
{available on-line or a PC version}

http://tab-bit.org/
Element 3

Public Participation
3 key parts:

Mechanisms and resources to provide meaningful opportunities for public participation, including:

• public access to documents;

• prior notice and opportunity for comment on proposed cleanup plans and site activities;

and

• a mechanism by which a person may request the conduct of a site assessment
Public Access

Public access to remediation plans and reports and decision documents is important.

- Can you increase the public knowledge about the access to information?
- Have you checked the documents lately?
- Can you conduct site visits or tours? (safely)
- Do you need translations?
Tribal Response Program/Brownfield
Three Affiliated Tribes
Environmental Division

hunaanu' kUšiNAsééNU ti-raawaaruuxtii

šikaakatuúteeRIt atsú tiwaaraarux-tii

tuxtAA'o noohunaačituú'

ti-NAhuná-sA wekaakIhuNAhAs

English Translation

1. This land of ours is sacred!
2. Even though the sacredness is not visible.
3. Have respect for everything
4. The earth is the only thing that lives for ever!
Assist Other Agencies?

The tribe is strongly encouraged to provide public access to all relevant documents for a response action conducted only under federal jurisdiction (i.e. Superfund, RCRA, LUST or DoD/USACE FUDS) or by the state through the TRP office.

Also, assist tribal members in understanding what is in the documents
Public Meetings

Having problems getting the community to attend your public meetings?
Combining Efforts

Combine public meetings or forums with other agencies and/or programs:

- Other Tribal programs
- Local community or civic groups
- Local events or conferences
- EPA meetings for Superfund, UST/LUST
- Other Federal agencies (DoD, Army COE)
Outreach WEB Site?

- How old is your web site?
- Is it up to date?
- Is it “user friendly”?
- How difficult is it to add or remove information?
- Can you receive feedback?
- Is it too complex? (slow)
Tribal Officials

• Do you have a process to keep tribal elected officials informed?
• Do you have a process in place to brief and inform newly elected officials?
• Do you need to develop a briefing package or presentation on what the program has accomplished and is planning?
Make it Understandable

• Do your contracts include having the contractor attending public meetings?
• Can you provide a “layman’s” version or summary of a technical report?
• Need assistance with development of power points, pictures or graphics for public presentations or brochures?
Requests for Assessments

• Are you getting any requests?
• If not, why not?
• Did a request result in a new site in your inventory and/or an assessment or cleanup?
• If a request has resulted in an assessment and/or a cleanup does the requestor/community know it?
Increase Community Involvement

COMMUNITY VISIONING MEETING
(Turtle Mtn. Band of Chippewa, ND)
Tribal Vision: Wellness Center

FROM THIS – TO THIS

Tribal Vision: Wellness Center
Element 4

Approval, Verification and Certification of Cleanup
Element 4 Part 1

Approval of a Cleanup Plan
Tribal Cleanup Process

Has your Tribe developed a model cleanup process that meets your needs?

To include:

✓ Format & content requirements
✓ Technical & other information requirements
✓ Public notice/participation requirements
✓ Review steps and all parties/agencies involved

{Do you understand the EPA and/or state process?}
Know who can do what?

Who will review a cleanup plan?

- Trained and qualified Tribal staff
- Qualified Tribal contractor – contract in place
- US EPA and/or state environmental staff TA
- Other qualified government staff (BIA, IHS, BLM, etc.)
- Qualified local government staff
Cleanups by Other Agencies

Review & comment on other relevant state or federal agency cleanup plans:

- Cleanups planned or occurring within or near tribal lands or communities?
- Cleanups that may impact resources utilized by the tribe or tribal members?
Need to Hire an Expert?

Hiring a consultant or other expert (i.e. engineer, chemist, toxicologist, attorney) to assist with the review of cleanup plans and other relevant documents can be a grant fundable cost under 128(a) subject to the approval of the EPA Regional grant manager.

Anticipate your support needs and work with Tribe and EPA on how to access and fund them.
Element 4 Part 2

Verification and Certification of a Cleanup
Verification

• When a response action is completed there needs to be verification by review and/or audit of the action and its’ results to ensure that all remediation requirements for a site have been successfully implemented or satisfied.

• The verification should be conducted by someone that has the expertise and experience to perform the audit of the results and/or conduct verification sampling and testing.
Verification

The verification can include:

• A review and audit of all field reports and data to include all relevant environmental media sampling and analysis results; and/or

• Independent sampling and analysis of relevant environmental media to verify results of the remediation.
Got the Tools?

Do you have all the necessary response program mechanisms in place to verify that response actions are complete?

Mechanisms can include:

- Authority via Tribal Laws/Codes or Council Resolution
- Tribal Approval Protocols or Procedures
- Technical resources & expertise
Know who can do what?

Arrangements in place for Approval or Verification to be conducted by:

- Trained and qualified Tribal staff
- “Licensed site professional” (no EPA standard for a “LSP”)
- Qualified “Environmental Professional” (as specified under 40 CFR §312.10)
- Qualified Tribal contractor(s) (contract in place?)
- US EPA and/or state environmental staff TA
- Other qualified government staff (BIA, IHS, BLM, etc.)
- Qualified local government staff
Certification of Completion

Has a model “Certification of Completion” been developed?

- Tribal officials informed?
- Signatures & sign-offs needed determined?
- Legal review and support in place?
- Filing and record system in place?
- Know who needs a copy?
- Any other approvals needed?
- What follow up may be needed?
Other Certificates

Have you developed a model for circumstances under which the Tribe might issue a qualified certification to include a:

- Conditional Certificate of Completion;
- Partial Certificate of Completion;
- No Further Action” (NFA) determination; or
- “Comfort Letter”.

(Tribal legal counsel should be consulted for the appropriate document to be used for a specific situation by the Tribe in accordance with Tribal laws and codes.)
Other Agency Actions

- Provide oversight services of a cleanup to another agency (DoD or USACE)?
- Contract services to another agency?
- Use 128(a) funds to verify a past or current cleanup by another party or agency on tribal lands?
How do I “enhance” the Public Record & I.C.s?

Can you put some Institutional Controls on the cat?
The “Law”

128(b)(1)(C) PUBLIC RECORD..... “maintain, update not less than annually, and make available to the public a record of sites, by name and location, at which response actions have been completed in the previous year and are planned to be addressed under the State program that specifically governs response actions for the protection of public health and the environment in the upcoming year.”
Most Tribes have created a notebook or file designated as the “Public Record” that is available to the public at the tribal environmental office, the tribal government office, or other readily accessible public location such as a school or library.
Public Record

• Do people know what it is?
• Do they know where it is?
• Is it up to date?
• Can it be more accessible or in more places?
• Can you add more usable information to it?
  (more pictures?)
• Is it on your web site?
  (When did you last see it?)
Maintenance of P.R.?

Subject to EPA regional office approval, tribes may include development and operation of systems that ensure long term maintenance of the public record in their work plans.

• Is there another person or tribal office that could do the job of keeping the P.R. up to date and complete?
Other Information

The process or media used for the Public Record may also be a mechanism to inform the community of related information or actions such as:

• Phase I or II Assessments planned or conducted
• Brownfield Inventory
• Related Inventories (open dumps, LUST, etc.)
• Informal “cleanups” such as community cleanups, school lab cleanups, open dump removals, etc.
Improve the P.R.?

• Using a multi-media approach that will reach all of the community?

• Improved coordination with other cleanup authorities and the use of the Public Record as a means to inform the community of all response actions that have or will take place in, or in the vicinity of, their community?
Institutional Controls
The “Law”

“The public record shall identify whether or not the site, on completion of the response action, will be suitable for unrestricted use and, if not, shall identify the institutional controls relied on in the remedy.”
I.C.s are:

Administrative or legal controls that help minimize the potential for human exposure to contamination on a site; or protect the integrity of a response action.
WHY ARE I.C.s NEEDED?

Governmental, Administrative and/or Legal Controls and/or Conditions need to be placed upon the use of a property when remaining or residual contaminants may pose a hazard if they are disturbed or if the land use changes and that would cause unacceptable exposures or new releases.
What can happen without I.C.s?

Tribal housing built above a prior landfill resulting in the abandonment & demolition of the houses.
Fundable Activities

EPA considers activities related to **maintaining and monitoring institutional controls** to be eligible costs under section 128(a). This may include installing, maintaining and monitoring engineering controls necessary to implement and enforce the institutional controls such as: fencing, gates, earthen berms or other barriers, signage, boarding of buildings and monitoring equipment.
Example I.C.s

Notice in the Deed,
Land Use Restrictions,
(zoning or resolution)
BIA/Tribal Lease Terms,
BIA “TSRs”

Signs,
Tribal Land Use Review,
or Environmental Reviews
Tribal I.C.s

A new concept to most tribes but becoming more needed due to:

- Need to restrict use of “cleaned up” sites or old closed dumps/landfills.
- Needs to expand housing areas
- Needs to renovate old housing or buildings
- Tribal acquisition of older properties
Tribal I.C.s developed?

Has a model tribal I.C. process been developed?

- **BIA Role Clear?**
- **Tribal officials informed?**
- **Tribal administrative process determined?**
- **Signatures & sign-offs needed determined?**
- **Legal review and support in place?**
- **Filing and record system in place?**
- **Know who needs a copy? (tribal offices & BIA?)**
- **Any other approvals or coordination needed?**
- **What monitoring or follow up may be needed?**
- **How will it be enforced?**
Tribal Environmental Review?

Some Tribes are developing their own environmental review process to review and approve any tribal property use or construction on tribal lands.

Some Tribes are developing their own Environmental Policy Act (TEPA) to include the review of any land use controls.
Monitoring I.C.s?

Have you made any arrangements for:
• Pre-approvals of changes in land use required?
• Pre-approval for construction?
• Notification of change in ownership?
• Notification of change of lease?
• Notification in change of land status?
Other Agency Actions

• Conduct site I.C. monitoring for another agency (EPA, BIA, DoD or USACE)?
TRP Continuing Issues:

- Jurisdictional uncertainties
- Lack of good property records;
- Management of grant funds and budgets;
- Contracting for new types of services;
- Staffing (recruiting, turnover, support staff, etc.);
- Continued training of staff and officials;
- Overlap and/or coordination with other programs;
- Gaps in necessary tribal laws, codes, procedures and policies.
Moving Ahead:

- Know “where you are at”
- Know what your gaps or weaknesses are
- Know where you want to go
- Review & update your priorities
- Use review to generate Grant Work Plan
- Do periodic reviews to keep on track
- Update plans and priorities as needed
Need more of Changing this…

…to this & eventual reuse
The 4 Elements of the TRP are the means to an end – NOT the “end goal”

What is the “End Goal”? 
Be determined in achieving your goals...
Aim High
Try to See Eye-to-Eye
Be a Good Team Mate