

FY2023 and FY2024 Pollution Prevention Grant Program

EPA-I-OCSP-OPPT-FY2022-001

Viejas Intertribal Pollution Prevention Project (VIP3)

EPA Region 9

NEA #6 Supporting Pollution Prevention in Indian Country or Alaskan Native Villages

The following proposed pollution prevention program is based upon the Intertribal Pollution Prevention Project established by Pala Band of Mission Indians and provide training and technical assistance (TTA) to 6 businesses on the Viejas Indian Reservation. This Pollution Prevention (P2) TTA will include an initial P2 assessment, implementation of P2 measures, staff trainings, data tracking, and other TTA. P2 TTA will focus on the reduction of hazardous chemicals used in operations, reducing energy and water use while providing staff and tribal colleagues with valuable knowledge that can transcend the workplace to their homes and lifestyle. The VIP3 will be used to develop new resources that can be shared with other Tribal nations using the web platform, Tribal P2 Action. Results of the VIPE will be shared to the Tribal P2 Action webpage and upon approval, presented during region 9 Regional Tribal Operations Committee meeting.

Total Project Funding: \$350,000.00

Project Funding Requested: \$350,000.00

Cristina Torres

Environmental Coordinator, Viejas Environmental Programs

Viejas Band of Kumeyaay Indians

1 Viejas Grade Road

Alpine CA, 91901

CTorres@Viejas-nsn.gov

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This duplicate of a previously funded application is intended for reference only.

1. Strategy and Approach

The Viejas band of Kumeyaay Indians (Viejas) is seeking funding from the EPA FY2023 and FY2024 Pollution Prevention grant program funded by the Bi-Partisan Infrastructure Agreement for the VIP3. With EPA funding assistance, Viejas will leverage available resources and work with internal and external partners to produce and conduct replicable technical assistance activities for the list of businesses in Table 1. Technical assistance activities will include: preliminary P2 assessments of each business, implementing appropriate P2 measures at each business, training and working with enterprise staff on select P2 technical training activities, developing P2 tracking and data management systems, applying for green business certifications and exchanging best practices and lessons learned.

This P2 effort provided by Viejas will continue to build upon the foundation established by The Pala Band of Missions Indians (Pala) for development and implementation of the national intertribal P2 program and platform that is accessible to tribes throughout the country. Viejas will collaborate with Pala to expand the national P2 program, gaining access to their online platform, Tribal P2 Action and ensuring all information is updated as necessary to reflect the most current opportunities and information around pollution preventions. The Tribal P2 Action website will provide on-demand training courses with a step-by step guide, templates, tools, best practices, case studies, and resources for conducting P2 assessments and P2 implementation measures. The VIP3 program will also include two 1-day tribal P2 in-person trainings, a virtual nationwide roundtable web conference meeting for sharing information and ideas among participants; a tribal P2 peer-to-peer matching initiative; and remote P2 technical assistance for up to 2 tribes.

Viejas is a federally recognized tribe located in rural Eastern San Diego County California. The VIP3 conducted at the business facilities located on lands owed by the tribe will focus on source reduction and pollution prevention strategies that will reduce the use of hazardous and chemical substances, energy, and water; improve purchasing practices; reduce business costs; and decrease greenhouse gas (GHG) emissions.

Viejas business employ approximately 2,088 persons and attract an average of 1,200 visitors per day on weekdays and up to more than 5,000 on the weekends or during an event. These businesses are surrounded by the Cleveland National Forest and other sensitive habitat for threatened, endangered, and protected species, such as the arroyo toad; California gnatcatcher; and golden eagle and many other migratory species that visit Viejas Creek and ponds.

Due to these focuses and the types of facilities listed in the table below, the VIP3 will support and align with National Emphasis Area (NEA) #6.

Table 1: Selected Viejas Business Facilities

Business Description	Key Pollution Source Concerns to Assess and Address
1.Viejas Casino & Resort Includes 133,000 s.f. gaming facility with over 2500 slot machines, 6 restaurants and multiple bars and entertainment lounges. Resort has over 120 rooms, and outdoor venue and entertainment areas.	This facility houses major energy consuming equipment (ex. HVAC Systems, cooking equipment, boilers, wastewater systems) and maintains a fleet of vehicles that consume oil and gasoline. Current amount

<p>The willows spa features multiple treatment rooms, saltwater spa pool, salt sauna, steam room, and a 24-hour fitness center. Additional facilities include a parking garage, landscaped surfaces and two large pools with spas. NAICS code: 721120</p>	<p>of hazardous materials, energy, and water usage are currently unknown</p>
<p>2.Viejas Outlet Center (Operations) The 255,000 s.f outlet center includes 17 different stores with 7 different eateries. Other facilities include enterprise operational offices, 12 lane bowling alley, bingo hall, arcade seasonal ice-skating rink, and business service center NAICS code: 452319, 72251, 561439, 713290, 713950, 713120, 713940</p>	<p>Hazardous materials used onsite including gasoline, propane, diesel, and possibly kitchen wastes from eateries. Energy and water use from the multiple water features throughout the outlet center. Current amount of hazardous materials, energy and water usage are currently unknown</p>
<p>3.MaTarAwa Viejas Camper Park The 133 Acre Camper park located on the Viejas Reservation with approximately 86 spaces. Features a convenience store, laundry facilities, arcade room, propane service, swimming pool and jacuzzi, and 99 RV hookups and campsites. NAICS code: NAICS code: 721211</p>	<p>Hazardous materials, energy and water usage are currently unknown.</p>
<p>4. Wastewater Treatment Facility: The 46,421 s.f wastewater treatment facility is permitted and monitored by the State of California for compliance with the Title 22 of the California Code NAICS code: 221320</p>	<p>Hazardous materials and energy usage are currently unknown.</p>
<p>5. The Willows Hotel and Spa The 287,660 s.f. Willows Hotel has over 120 rooms, and outdoor venue and entertainment areas. The willows spa features multiple treatment rooms, saltwater spa pool, salt sauna, steam room, and a 24-hour fitness center. Additional facilities include a parking garage, landscaped surfaces and two large pools with spas NAICS code: 721110</p>	<p>This facility houses major energy consuming equipment (ex. HVAC Systems, cooking equipment, boilers, wastewater systems) and maintains a fleet of vehicles that consume oil and gasoline. Current amount of hazardous materials, energy, and water usage are currently unknown.</p>
<p>6. Viejas Waste Transfer Station The transfer station handles most municipal waste from residents on the reservation, some residents opt for personal pickup service directly from their residences. The transfer station handles</p>	<p>The transfer station is the main point of storage for used motor oil, paints, cooking oil, pesticides, e-waste, and other hazardous waste looking for disposal services on the reservation. Facility also</p>

approximately 5-8 tons of recycling, landfill bound and green waste every month. On top of that the transfer station also handles the hazardous waste from NAICS code: 562111, 562112, 562119	maintains a fleet of vehicles. Hazardous waste storage, handling and training will be assessed.
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The Viejas has made efforts in the past to conduct P2 related activities, but there is currently no uniform strategy in place to address any key pollution concerns outlined in table 1. P2 opportunities, initiatives, and information are not communicated effectively to most staff. This leaves P2 activities at Viejas businesses to be infrequent at best, or phased out due to lack of consistent attention, and many new opportunities to substantially reduce pollution and associated cost are being missed. This is not just a problem for Viejas, but also for the neighboring rural communities, both tribal and non-tribal where P2 educational opportunities are not as available.

The proposed VIP3 will address the issues and opportunities described above. In order to keep track of goals and adapt to ever changing circumstances, the program will be broken down into 5 phases, each with their own roles and grant deliverables.

Phase 1 – Detailed Pollution Prevention Evaluations & Action Plans

In Phase 1, Viejas Environmental Programs (VEP) staff will conduct detailed P2 pre-evaluations, and then prepare action plans for all five businesses outlined in table 1. The detailed P2 pre-evaluations will evaluate hazardous and non-hazardous materials purchases, storage and use; energy and water use; and related GHG emissions and costs. The detailed P2 pre-evaluations will be used to identify potential P2 opportunities and various options for improvement. These on-site pre-evaluations will include data collection, organization, and reporting analysis of relevant information gathered; and meetings with the tribal and non-tribal business representatives to discuss P2 business history and action plans. P2 consultants will provide technical assistance throughout both the evaluation and action planning phases under leadership from VEP. This will ensure that staff can be simultaneously involved in the evaluation and training phases. P2 consultants will be responsible for coordinating free and subsidized P2 assessment services and resources such as energy and water use audits, and complimentary advice from existing hazardous and non-hazardous material service providers. VEP staff along with P2 consultants will work with business leadership to develop P2 assessment reports and action plans for each business outlined. Each action plan will include identifiable goals, actionable objectives, community-based strategies for reducing hazardous and chemical substances, energy, water, GHG emissions, and costs, all covering the next 4 years. The development of these reports will all factor in technical feasibility, financial savings, and environmental benefits. P2 reports will be designed to be updated regularly, to prepare for any adaptive circumstances that may arise within the 4-year period.

Phase 2 – Action Plan Monitoring, Pilot Implementation and Green Business Cert

In phase 2, VEP will develop a P2 data and results management system that will allow for ongoing monitoring, evaluation, and planning of strategies adopted in the action plans from phase 1. The tracking system will also be used to track, analyze, share P2 issues and results with leaders, employees and other stakeholders. VIP3 steering

committee will advise on a central information management system, and develop policies and procedures for collection of information and data from businesses on a defined regular basis.

VIP3 steering committee will select strategies from the P2 action plan for each facility to implement as a pilot demonstration project. Additionally, the VIP3 project team will pursue Green Business Certifications through the California Green Business Network.

Phase 3 – Employee Training and Collaboration

Once strategies for implementation have been chosen, all new and existing staff of the tribal businesses in table 1, as well as tribal government employees will be involved in P2 training. VEP staff and P2 consultants will coordinate with the Human Resources Department and various training staff to integrate P2 content into already existing trainings and staff communication channels, such as Viejas multiple day training orientation for new staff which includes a tour of the business facilities, newsletters, pre-shift notices, bulletin boards, Microsoft teams, etc.

Prior to implementing training procedures, VEP staff and P2 consultants will work with human resources departments and management to develop annual training plans that will focus on communicating helpful P2 information on hazardous materials waste, chemical substances, water use, energy use, GHG emissions and cost saving opportunities/efforts. This plan will provide an outline of what, how and when P2 trainings will be conducted. To aid in implementation the P2 project team will develop and provide P2 training content and literature that describe P2 practices, achievements, and opportunities that will be shared by Human Resources through the communications channels described above.

The P2 project team will recruit and select business focused P2 teams across the different businesses and business departments. Once P2 teams are established, VEP will host meetings quarterly for P2 teams in order to identify P2 issues and opportunities and ask P2 teams to share successes as well. P2 meetings will also be spaces to develop new P2 projects and initiatives that can be added to action plans. P2 team members will be ambassadors, helping to distribute information and gain input from fellow staff.

Phase 4 – National Intertribal Training, Information Sharing

Many tribes across the country have similar operations with similar P2 issues and opportunities. There are a variety of ways that this proposal seeks to leverage and extend the deliverables and benefits of the P2 TTA provided to Viejas businesses to other entities, primarily tribes, both during and after the grant period. As the P2 Project Team completes Tasks 1-3, the processes, procedures, forms, lessons learned, findings, results, etc. will be prepared in a manner that facilitates future training, distribution, and sharing by building upon knowledge attained in Pala's past experiences

1. An online, on-demand tribal P2 training course that provides step-by-step processes for how to conduct P2 assessments, develop P2 an action plans, and implement P2 measures at tribal businesses. Training participants can earn a certificate of completion.
2. A brief, easy to follow P2 assessment and strategic planning step-by-step guide.

3. Online tools including P2 project forms, assessment templates, action plan outlines, checklists, data collection forms, case studies and other resources. Case studies will include a summary description of the P2 measures, practices and results Viejas business facilities.
4. Two free 1-day P2 on-site training and facilities tour for tribal participants. This training will be coordinated and conducted by the P2 Consultants and Viejas with input from Pala and will include a combination of P2 training, case study presentations, and a tour of Viejas facilities.
5. A P2 mentorship program that matches experienced and inexperienced tribal businesses and support staff for peer-to-peer P2 learning opportunities.
6. Remote P2 assessment and planning technical assistance for up to 2 additional tribes. This may include advising and guidance for assessment and planning processes, renewing actions plans, etc).
7. A national tribal P2-themed roundtable virtual conference to exchange information and resources, share ideas, discusses successes and challenges, etc.

The online training and all resources will be added to an existing website that meets the project needs and objectives.

Phase 5 – Partnership and Performance Committee

VEP will assemble the VIP3 steering committee comprised of representatives from Viejas, as well as project consultants and partners. This will allow for continuous collaborative management of the VIP3 and idea exchanges throughout the duration of the project. VEP (on behalf of Viejas as applicant and lead agency), will prepare and submit semi-annual progress reports, a final technical report, annual financial reports, drawdown requests, and any other required documentation in accordance with grant requirements. VEP will also evaluate and discuss project progress finances, and potential modifications with the EPA, as needed

Table 2. Project Workplan Summary; Work Products and Costs

Task 1:	Comprehensive Pollution Prevention Assessments & Action Plans: \$141,000	Cost
1.1	Conduct pre-assessments, kick-off meetings, and tours	\$22,000
1.2	Conduct comprehensive on-site P2 assessment	\$60,000
1.3	Develop P2 report and action plan	\$35,000
1.4	Adopt and publish P2 report and action plan	\$2,000
Task 2:	Action Plan Monitoring, Pilot Implementation and Green Business Certification: \$38,500	
2.1	Develop P2 data and results tracking system for 6 businesses	\$10,000
2.2	Track and report data and results using P2 tracking system *This will be completed by 1/31/25	\$8,000
2.3	Implement pilot demonstration projects of select action plan items	\$18,000
2.4	Pursue Green Business Certification	\$7,500
Task 3:	Employee Training & Collaboration: \$33,000	
3.1	Develop employee P2 training plan	\$9,000
3.2	Develop P2 content and materials for employee training	\$15,000

3.3	Train HR trainers to integrate P2 features into employee trainings *Consultants are well continue to provide remote support as part of agreement	\$10,000
3.4	Recruit and assemble Green Team members	\$3,000
3.5	Conduct quarterly Green Team meetings	\$12,000
Task 4:	National Intertribal Training, Info Sharing, and Recognition: \$114,000	
4.1	Develop, publish, and promote an online tribal P2 training course	\$40,000
4.2	Develop, publish, and promote a step-by-step P2 guidance for tribes	\$10,000
4.3	Develop, publish, and promote online resources, tools, case studies, etc.	\$12,000
4.5	Identify and connect mentors and mentees for peer-to-peer learning	\$12,000
4.6	Coordinate, promote, and host two different 1-day P2 on-site training with tours (*Coordination will take place prior to end of year two but training will be held following P2 implementation for best training)	\$30,500
4.7	Promote and conduct remote P2 technical assistance for up to 2 tribes (*will be completed by contractors pending completion of Viejas Implementation)	\$7,000
4.8	Develop, promote, conduct quarterly national P2 roundtable online meetings	\$5,000
4.11	Present VIP3 project results and resources at Annual EPA 9 Tribal Conf.	\$11,000
Task 5:	Partnership and Performance Administration: \$23,500	
5.1	Hire P2 consultants/trainers	\$1,000
5.2	Assemble and convene P2 steering committee at least semi-annually	\$7,000
5.3	Gather and calculate semi-annual project P2 results	\$1000
5.4	Prepare and submit semi-annual progress reports and final technical report	\$1000
5.6	Prepare and submit financial reports and drawdown requests	\$1000

This project will involve both internal and external partners to ensure the success of P2 during and after the project is maximized. VEP has already reached out to other Tribal nations here in San Diego County for grant application guidance and advice, including the Pala Band of Mission Indians who are lending their support by allowing Viejas to leverage the existing online platform to share the knowledge gained to new and existing members of the national P2 network. A letter of support from Pala is attached.

A key external partnership that will be essential to successfully completing the project will be Prosper Sustainability. Prosper Sustainability has extensive experience in developing a wide variety of P2, environmental, and sustainably projects and programs, including in developing and delivering online and in-person trainings and administering programs, including a national, EPA-funded program led by Pala to build the capacity of tribes to address the health impacts of climate change. Prosper Sustainability will help guide Viejas on best practices for TTA based on their experience working with Pala on the IPPP. With Prosper's support Viejas can continue to develop the national intertribal

P2 program and work fluidly with any future Contractual partner. A letter of support is attached.

The Project Team will also seek to partner with SDG&E (for free comprehensive commercial energy audit and reports), the Center for Sustainable Energy, Ecology Action (which has run a Casino Green program), Native American Environmental Protection Coalition (NAEPC), Pollution Prevention Resource Exchange Network (P2Rx), Tribal Pollution Prevention Network (Tribal P2), EPA's Small Business Environmental Assistance Programs, UC Cooperative Extension for onsite pesticide and water/irrigation advising, and others.

Tasks 3 and 4 of this project are designed to share information, best management practices, lessons learned, and innovations of this project for tribal businesses and communities beyond the 6 Viejas facilities, both during and after the award period. Task 3 activities focus on building capacity of other employees within Viejas to conduct P2 efforts. Task 4 activities further extends the replicable benefits and deliverables of this project by building capacity for tribes across the country through the national intertribal P2 program.

The section below provides a comprehensive plan for gathering and reporting on the expected environmental outcomes and outputs of the VIP3, including linkages to EPA's Strategic Plan.

2. Environmental Results, Measurement & Reporting P2 Recommendations and Actions Implemented

The proposed project plan is designed to address significant environmental and human health concerns, as well as provide an opportunity for Environmental Justice as outlined in NEA #6. VEP has specifically set up this program to align with EPA's strategic plans #3 and #4 of the FY2022-2026 EPA Strategic Plan Framework: Advancing EPA's organizational Excellence and Workforce Equity, and Strengthening Tribal, State, and Local Partnerships and Enhancing Engagement. In addition, this project also aligns with specific EPA's goals, including: Ensuring Clean and Healthy Air for All Communities, Ensuring Clean and Safe Water for All Communities, and Ensuring Safety of Chemicals for People and the Environment. VEP is pursuing a reduction in the pollution impacts that businesses on the reservation face, including toxic substances, hazardous materials, hazardous waste, and emissions and other impacts associated with fuel, electricity, propane, and water use within commercial buildings, fleet and operations. Hazardous substances utilized in business operations threaten the health and safety of business staff, customers, consumers, and members of the public daily. The storage, potential release, and use of hazardous substances in and around business facilities threatens environmental health.

The project output and expected behavior changes are shown in Table 2 below. The estimated project outcomes in Table 4 were selected to reflect the comprehensive nature of the VIP3 P2 activities. The narrative following these tables describes a plan for how these results will be tracked, measured, and evaluated.

Table 2. Estimated expected Project Outputs and behavior Changes

P2 Activity	Outputs	Behavior Changes
Assessment & Actions: Viejas Participating Facilities (6)	<ul style="list-style-type: none"> • P2 preassessments for 7 business facilities • P2 Assessment Report and Action Plan for 7 businesses • 10 Technical Assistance Meetings with 10-20+ business leaders/representatives to gather necessary input • 5 external stakeholder groups involved in VIP3 steering committee and assessment process • 7 Onsite Technical Assessments of different business facilities • 4 Recommended Actions Adopted/ Implemented • Green Business Certifications for 3-7 business facilities 	<ul style="list-style-type: none"> • Increased implementation of P2 activities that reduce water, energy, toxic/hazardous substances, and costs
Data & Results Tracking	<ul style="list-style-type: none"> • P2 Data & Results Tracking System • 2 Years of Data and Results Collected 	<ul style="list-style-type: none"> • Increased monitoring and analysis of P2 activities, data, and results
Employee Training	<ul style="list-style-type: none"> • Employee P2 Training Plan; Revised Plan • P2 training materials prepared/distributed to 3,000+ employees (≥ 3 pieces of literature on different P2 topics) • HR trainers trained on P2 topics for NHO tours given to ~10 new hires per week • 4 employees trained to conduct periodic P2 assessments or updates in future 	<ul style="list-style-type: none"> • Increased understanding and implementation of P2 activities by new and existing employees in water, energy, toxic/hazardous substances, costs, and GHG emissions
Green Teams	<ul style="list-style-type: none"> • 10-20+ recruited green team members per tribe • Introductory green team meeting for 20-50+ employees (sign-in sheet, agenda) • 8 quarterly green team meetings with 10+ employees (sign-in sheets, agendas) 	<ul style="list-style-type: none"> • Increased investigation, development, and implementation of P2 activities by Green Team members and represented departments
Intertribal and External Engagement	<ul style="list-style-type: none"> • (2)1-Day P2 Training & Workshop with 20-50+ workshop attendees (sign-in sheet, agenda) • P2 assessment and strategy step-by-step guide and templates, data collection template, best practices document, and P2 resources document posted to website and emailed to 1,000+ individuals representing different 	<ul style="list-style-type: none"> • Increased P2 assessments, strategies, and implementation among other tribes, businesses,

	tribes, agencies, NGOs, businesses, and other organizations <ul style="list-style-type: none"> • Representatives of 28 other tribes (5% of tribes nationwide) participate in trainings and online services • 1 intertribal P2 web conference slides or recordings with 25-50 tribal representatives 	communities, agencies, and other organizations
Performance & Financial Reporting	<ul style="list-style-type: none"> • Semi-Annual and Final Reports to EPA • SF-425 & DBE Reports and Drawdown Requests to EPA 	<ul style="list-style-type: none"> • Tracking and evaluation of project progress and finances

Table 3: Estimated Project Outcome Measures

P2 Activity	Hazardous material inputs & Pollutants reduced	CO ₂ Equivalent Emissions Reduced	Water Use Reduced (gal.)	Dollars Saved from P2 Activity
1. Assessment & Actions; Employee Training & Green Team: Viejas Participating Facilities (Tasks 1-3)	10% reduction (actual #'s TBD)	10 % reductions (actual #'s TBD)	10% reduction (actual #'s TBD)	10% reduction (saving #'s TBD)
2. Intertribal Training, Information Sharing, and Recognition: Facilities at 5% of US Tribes (Task 4)	15,388 cases per year of cleaning chemicals and 1,982 pounds of pesticides (10% reduction)	269,902.6 per year (estimated 5% reduction)	204.4 million per year (5% reduction)	\$8,428,041 per year (5% reduction by 5% of tribes)

Because some Viejas facilities do not yet have advanced systems for tracking some of the resources inputs (such as water, hazardous waste, fuel), the outcomes estimated in Table 4 are significantly underestimated. Part of the goal of this project is to develop better tracking systems at Viejas to allow for more accurate tracking and more data-driven decision making.

3. Programmatic Capability & Environmental Results Past Performance Criteria

Viejas looks for every opportunity to take P2 measures into consideration amongst all of their enterprise operations. Because Viejas generates all its water locally from well sources, reducing water waste is a priority level initiative in all aspects of Tribal operations. On top of that, hazardous waste reduction is another priority level initiative due to the potential of runoff leaching into groundwater resources.

VEP has been a recipient of projects funded under grants from the USEPA as well as other federal and state resources. VEP is currently funded by EPA GAP, CWA319 (Non-Point Source Base), CWA106 (Water Pollution Control), and the BIA Water Resource grant and continuously provides deliverables and project updates to EPA and BIA. These funds help Viejas plan, develop and establish environmental protection programs and allow for the implementation of solid waste and water quality programs. VEP is in the process of developing exciting new programs including a large-scale organic waste recycling operation in coordination with enterprise operations and

developing a water and drought analysis case study in the Viejas watershed. Viejas maintains an open line of communication with the EPA and BIA corresponding via conference calls and emails to continuously build strong working partnerships. VEP has always complied technical and reporting requirements for these grants and with the many difficulties experienced during the pandemic VEP have performed in accordance with the key elements of their grants and remain in good standing with the EPA and BIA.

VEP protocol dictates that we submit bi-weekly grant project deliverable updates to Viejas council to ensure deliverable tasks remain on or ahead of schedule. Viejas has complete capability to manage financial oversight and federal reporting requirements through standard operating procedures and controls managed by Viejas Resource Management Director Ray Teran. All grants are subject to an annual audit by outside firms, and those audit reports are submitted to grant agencies as required.

4. Timeline

The VEP will ensure timeliness and completeness of proposed tasks and objectives during the project period (timeline details in Table 4). If progress is falling behind for any of the objectives, the VEP will with the responsible person(s) to make adjustments that will ensure all outputs are completed as close to the original timeline as possible, but definitely by the end of the project period. The status and completion of each output will be documented in internal work plans and in the semi-annual progress reports prepared for the EPA.

Table 4. Project Workplan Summary; Timeline

Task 1:	Comprehensive Pollution Prevention Assessments & Action Plans: \$141,000	Timeline
1.1	Conduct pre-assessments, kick-off meetings, and tours	12/1/22-1/31/23
1.2	Conduct comprehensive on-site P2 assessment	2/1/23-4/30/23
1.3	Develop P2 report and action plan	4/1/23-9/31/23
1.4	Adopt and publish P2 report and action plan	7/1/23-10/31/23
Task 2:	Action Plan Monitoring, Pilot Implementation and Green Business Certification: \$38,500	
2.1	Develop P2 data and results tracking system for 6 businesses	7/1/23-10/31/23
2.2	Track and report data and results using P2 tracking system *This will be completed by 1/31/25	10/1/23-9/31/24
2.3	Implement pilot demonstration projects of select action plan items	02/1/23-04/31/23
2.4	Pursue Green Business Certification	5/1/24-01/31/24
Task 3:	Employee Training & Collaboration: \$33,000	
3.1	Develop employee P2 training plan	7/1/23-9/31/23
3.2	Develop P2 content and materials for employee training	10/1/23-4/30/24
3.3	Train HR trainers to integrate P2 features into employee trainings *Consultants will continue to provide remote support as part of agreement	12/1/24-4/30/25

3.4	Recruit and assemble Green Team members	7/1/23-9/30/23
3.5	Conduct quarterly Green Team meetings	10/1/23-09/30/24
Task 4:	National Intertribal Training, Info Sharing, and Recognition: \$114,000	
4.1	Develop, publish, and promote an online tribal P2 training course	10/1/23-6/30/24
4.2	Develop, publish, and promote a step-by-step P2 guidance for tribes	10/1/23-6/30/24
4.3	Develop, publish, and promote online resources, tools, case studies, etc.	10/1/23-6/30/24
4.5	Identify and connect mentors and mentees for peer-to-peer learning	2/1/24-9/30/24
4.6	Coordinate, promote, and host two different 1-day P2 on-site training with tours (* Coordination will take place prior to years end will be held following P2 implementation for best training)	3/1/24-8/31/24
4.7	Promote and conduct remote P2 technical assistance for up to 2 tribes (* will be completed by contractors pending completion of Viejas Implementation)	1/1/24-9/30/24
4.8	Develop, promote, conduct quarterly national P2 roundtable online meetings	10/1/23-09/30/24
4.11	Present VIP3 project results and resources at Annual EPA 9 Tribal Conf.	10/1/25-12/31/25 (*Presentation will be given at FY 25 Annual Conference)
Task 5:	Partnership and Performance Administration: \$23,500	
5.1	Hire P2 consultants/trainers	11/1/22-01/31/23
5.2	Assemble and convene P2 steering committee at least semi-annually	01/1/23-12/30/24
5.3	Gather and calculate semi-annual project P2 results	1/1/23-01/31/25 (* final reports will be submitted 1/31/25)
5.4	Prepare and submit semi-annual progress reports and final technical report	1/1/23-1/31/25 (* final reports will be submitted 1/31/25)
5.6	Prepare and submit financial reports and drawdown requests	1/1/23-1/31/25 (* final reports will be submitted 1/31/25)

5. Budget

Table 5. Budget by Year and Category

PERSONNEL			Year 1	Year 2	Total
Position	Rate	Hours	Federal	Federal	
<i>Environmental Coordinator/ Project Manager</i>	\$ 30.00	238	\$2,820	\$ 4,320	\$ 7,140
Environmental Specialist	\$ 23.00	400	\$2,852	\$6,348	\$9,200
Intern	\$ 16.00	400	\$ 1,984	\$4,416	\$6,400
Totals		1038	\$ 7,656	\$15,084	\$22,740
FRINGE BENEFITS			Year 1	Year 2	Total
Description	Rate	Base	Federal	Federal	
24% of Personnel Costs	24%	\$22,740	\$ 1,837	\$3,620	\$5,458
Totals			1837	\$3,620	\$ 5,458
CONTRACTUAL			Year 1	Year 2	Total
Description			Federal	Federal	
<i>Consulting Fees: Expert Technical Assistance, Project Dev, Implementation</i>			\$ 80,000	\$100,000	\$180,000
<i>Consulting Travel Expenses</i>			\$ 15,000	\$12,000	\$27,000
<i>Consulting Fees: Hazardous and Toxic Substance Assessment & Strategy</i>			\$ 56,272	\$22,243	\$78,515
<i>Consulting Fees: Water Audit</i>			\$ 20,000	\$ -	\$ 20,000
TOTALS			\$171,272	\$134,243	\$305,515
OTHER			Year 1	Year 2	Total
Description	Rate	Base	Federal	Federal	
Pala Environmental Director	\$ 65.00	100	\$2795	\$3705	\$6500
Monthly Web conference Service Subscription Fee	\$500.00	2	0	\$1,000	\$1,000
Monthly Email Marketing Services Fees	\$50.00	4	0	\$ 200	\$ 200
TOTALS			\$2795	\$4905	\$7700
INDIRECT COST			\$3728	\$4860	\$8588
			Year 1	Year 2	TOTAL
TOTAL PROJECT COSTS			\$187,288	\$162,712	\$350,000