

IOWA TRIBE OF KANSAS AND NEBRASKA



SUSTAINABLE, COMPREHENSIVE ECONOMIC DEVELOPMENT PLAN/STRATEGY 2020

COMMENTS AND ACKNOWLEDGEMENTS

The Iowa Tribe of Kansas and Nebraska (ITKN) Economic Development Coordinator would like to thank all of the Tribal members who attended public meetings to discuss Tribal economic development priorities and strategies. The results of the study, upon which much of this Plan is built, helped shape the Workforce Development and Business Assistance strategies of this Plan, and helped identify the priorities that you feel we should be addressing in economic development. We appreciate your thoughts and ideas.

ITKN would also like to thank our partners who assisted with the development of this Sustainable, Comprehensive Economic Development Strategy. Most importantly, we would like to thank the Tribal Elders and the Executive Committee for their thoughtful guidance and perspective. Members of the ITKN Executive Committee are selected via a staggered election process, with 4-year terms of service. The ITKN Executive Committee members are as follows:

Name	Title	Appointment Date
Tim Rhodd	Chairman	October, 2007 – Present
Lance Foster	Vice-Chairman	October, 2019 – Present
Tony Fee	Secretary	November, 2010 – Present
Elyse Towey	Treasurer	October, 2019 – Present
Robbie Craig	Board Member	October, 2007 – Present

**RESOLUTION OF THE IOWA TRIBE OF KANSAS AND NEBRASKA EXECUTIVE COMMITTEE IN
SUPPORT OF THE COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGY**

April 8, 2020

WHEREAS, The Iowa Tribe Executive Committee being duly organized met in Special Session this 8th day of April 2020: and,

WHEREAS, The Iowa Executive Committee has authority to act for the Iowa Tribe under the present Constitutional authority as provided in Sec. 1.a., Article IV - Governing Bodies; and,

WHEREAS, The Iowa Tribe of Kansas and Nebraska being organized and empowered by their Constitution and Bylaws (approved November 6, 1978, and amended August 27, 1980; and,

WHEREAS, The Iowa Tribe of Kansas and Nebraska has the authority to negotiate with the Federal government and to conclude contracts, grants, or other agreements under Article V, Section 1.a. of the Constitution; and,

WHEREAS, The Executive Committee has established continued economic development in the region as a major priority; and,

WHEREAS, The economic opportunities and limitations exist in the region that influence development possibility; and,

WHEREAS, the surveillance and analysis of these economic factors promote long-range development consideration for coordinated action within the region;

NOW THEREFORE BE IT RESOLVED, that the Iowa Tribe of Kansas and Nebraska Executive Committee hereby adopts the Comprehensive Economic Development Strategy Progress Report for the policies set forth therein.

CERTIFICATION

The foregoing Resolution was duly adopted this date, April 8, 2020, in a Special Session of the Executive Committee, at which members of the Committee were present, constituting a quorum, by-a vote for, against. Chairman abstained.

ATTESTATION:

Timothy N. Rhodd, Chairman Iowa Tribe Executive Committee

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1. EXECUTIVE SUMMARY

The Iowa Tribe of Kansas and Nebraska’s Sustainable, Comprehensive Economic Development Strategy (CEDS) or Strategic Economic Development Plan includes input from Tribal members, Tribal government programs, the nonprofit sector, and the private sector, including Tribal corporations and small businesses.

According to the EDA, the purpose of the CEDS is to establish a strategy with which to guide economic impacts and boost the Iowa reservation into greater economic prosperity through short-term planning objectives and long-term planning goals. This CEDS document creates an action plan to unite local governments, organizations, businesses, and residents to develop and diversify the economy, improve quality of place factors, efficiently utilize resources, and protect the environment.

Also instrumental to the CEDS is building and planning for resiliency, which has been incorporated throughout the CEDS document in the “Economic Resilience” section. The strategy set forth is built upon interviews with key stakeholders, engagement of local businesses, demographics within the region, and effective strategies for serving the reservation’s unique assets.

ITKN’s Sustainable, Comprehensive Economic Development Strategy was developed with input from an interdisciplinary, interagency steering committee. The Executive Committee, Culture Committee, and Elders also played active roles in the development of this document.

IOWA TRIBE OF KANSAS AND NEBRASKA	CEDS MEMBER CATEGORY	Economic Interests
Tim Rhodd	Chairman	Operations, infrastructure, administration, hemp. agriculture, Smart Farm, business development, police department
Lance Foster	Vice-Chairman	Community engagement, Tribal Historic Preservation Officer, Land use planning
Tony Fee	Secretary	Operations, Procurement, planning, enterprises, road maintenance, enrollment, utilities
Elyse Towey	Treasurer	Grant writing, grant administration, renewable energy, HUD, Indian

		Health Services
Robbie Craig	Board Member	Human resources, Finances, Government Relations
David Tam	Economic Development Coordinator	Renewable Energy, economic development, business development, 8(a), Foreign Trade Zone, business management
Artees Vannett	Director of Agriculture	Industrial Hemp, business development, business management, Ioway Bee Farm, Soje, Smart Farm, agriculture
Linda Rhodd	Grant Administrator	Grant administration, program development, project development

The following strategic plan meets the goals and objectives of both federal administrations and ITKN's goals for economic development and incorporates the information gained in ITKN's 2015 Strategic Economic Development Plan.

This strategy describes the background setting of the Iowa Reservation economy, including information about Tribal history, demographics, the physical environment, existing Tribal businesses, job training programs and entrepreneur resources, as well as economic trends, the relationship to the outside economy, and other economic performance factors.

This plan identifies the strengths and weaknesses of the Reservation economy, as well as opportunities and threats—called a SWOT analysis. This SWOT analysis directs the strategy and action plan of the Iowa Tribe for economic development. This action plan is developed in alignment with Tribal values and goals for the Reservation. Evaluation and performance measures are incorporated into the Action Plan, as well as a strategy for addressing economic resilience.

STAKEHOLDER INTERVIEW

Individual interviews were conducted with key stakeholders to better understand local perceptions regarding the strengths and weaknesses of the reservation and the surrounding counties.

NAME	TITLE	ORGANIZATION
Rebecca Cromer	Executive Director	Falls City EDGE
David Tam	Economic Development Coordinator/ Key Project Contact	Iowa Tribe of Kansas and Nebraska
Zan Kash	Research Analyst	Tam Global Consultants
Artees Vannett	Ag Director	Tam Global Consultants
Brett Ansite	IT Director	Tam Global Consultants
Mike Frederick	General Manager	Casino White Cloud
Sharice Davids	Congresswomen	State of Kansas
Peter Gregory	President	R2B Microgrid Solutions LLC
Mary Cronin	CEO and President	Strategy Hub LLC
Gary Johnson	CEO	TAG
Joshua Carter	CEO	hiTrust Connections
Lisa Benson	CEO	FireFly Hospitality

Dr. Michael Bryer-Ash	Director	White Cloud Health Center
Scott Elrod	Fish and Wildlife Officer	Fish and Wildlife - Iowa Tribe of Kansas and Nebraska
Paul Mendez	CEO	Boys and Girls club - Iowa Tribe of Kansas and Nebraska
Clint Waggoner	City Official	White Cloud
Michelle Waggoner	City Official	White Cloud
Becky Simmonds	City Council Member	White Cloud
Jim Currie	General Manager	Brown Atchison Electric Co-Op
Leah B. Johnson	Economic Development Director	Doniphan County
Julie Meng	Emergency Management	Doniphan County
Sheryl Pierce	RN Adm.	Doniphan Co. Health Dept./Home Health
Suzanne Lane	CEO	Kansas Energy Power Co-Op
Mark Barbee	Sr. Vice President, Engineering and Operations	Kansas Energy Power Co-Op
Brian Kirkendall	Emergency Management Agency	Richardson County
Mary L. Eickhoff	County Clerk	Richardson County
Mikaela Moore	Economic Development Director	Hiawatha Foundation for Economic Development
Bryce Dahlstrom	President	Viking Timber
David Sickel	Chairman, Richardson County board of Commissioners	Richardson County
John Caverzagie	Commissioner	Richardson County
Rebecca Wason	Administrative Assistant Emergency Management Agency	Richardson County
Kristy Richardson	Deputy Director Emergency Management Agency	Richardson County
Shay Homeyer	City Official	Rulo City
Deb Fox	President	Highland Community College

CEDS SURVEY

The ITKN Economic Development Community Survey was undertaken as part of community engagement associated with the development of the ITKN Comprehensive Economic Development Strategy (CEDS).

The survey was made available to Iowa tribal members on the reservation and the surrounding counties and was marketed through local media and email lists. The survey was open during January and February 2020. A total of 51 respondents completed the

survey. See Appendix for survey

Demographic information relating to the 45 respondents that provided these details showed:

- Iowa Reservation (45.7%) & Brown (38.9%) had the highest percentage of respondents, followed by Doniphan (6.8%), & Richardson (5.7%). Taking into account the counties' populations, the Iowa Reservation and Brown County were overrepresented as a proportion of survey respondents (both represented 35% to 40% of respondents, while their populations each comprise approximately 38% of the total population of the reservation and surrounding counties).
- 45.2% of participants work on the Reservation
- 82.7% have lived on the reservation and surrounding counties
- The age distribution of the respondents was generally in alignment with the age distribution of the region's population, for which the median age is around 38 years old.

Responses to the survey are grouped according to the 6 key economic development areas of focus being considered as part of this project. These areas of focus are:

1. Infrastructure
2. Business Attraction and Retention
3. Business Services and Regulation
4. Workforce Development and Training
5. Housing and Social Services
6. Regional Coordination.

INFRASTRUCTURE

Responses to questions about infrastructure for the community were, by a large margin, the most unified. This implies that there is an agreement that the community lacks adequate basic infrastructure.

Strong support exists for a strong push towards energy infrastructure based on alternative sources including wind and solar and although respondents were generally supportive of economic opportunities existing overall. 82.1% of respondents believe there is a large gap in the provision of health care services. Several respondents indicated frustration with the lack of a safe, healthy and walkable community.

Responses indicate that there is a broad appreciation across the community for the complexity and magnitude of infrastructure projects, and their capacity to impact broad aspects of economic and social activity. It can be inferred that support exists for comprehensive planning and appropriate project timelines in the interest of getting the right solutions to issues of transportation, communications, energy, and water.

BUSINESS ATTRACTION AND RETENTION

Respondents indicated that business attraction efforts should implement solid strategies to help smaller and start-up businesses. Where there are opportunities to attract larger companies, it makes sense for the region to coordinate these efforts, whereas local governments tend to be better positioned to engage with and support existing businesses.

BUSINESS SERVICES AND REGULATION

Respondents indicated that there was adequate access to basic services such as internet and roads. However, only 17.6% of survey takers chose energy/alternative energy as a community asset.

Survey respondents also indicated that assisting small business owners as well as supporting small businesses and schools was a way in which the community can use its resources to boost the economy.

Community meetings also revealed a strong desire for the establishment of supporting businesses (such as a tire business), and allowing for no-cost business licenses. This, in addition to a call for flexible codes for building use and the use of empty buildings as an adaptive capability for the community's economy, were thought to best serve the community's economic needs.

Finally, community involvement in this process revealed a want for programs to encourage tourism and provide more food options.

WORKFORCE DEVELOPMENT AND TRAINING

In total, the survey responses related to workforce development and training had the strongest level of support. Survey respondents provided the most support for apprenticeships and workplace training. Strong support for workforce training grants was also given, in addition to the belief that local economic development professionals should promote the development of industry-specific training programs at postsecondary educational institutions. Respondents also tended to agree that it is important for economic development organizations to understand workforce issues and be able to provide relevant information regarding the strengths and weaknesses of the region's workforce.

HOUSING AND SOCIAL SERVICES

Overall, survey respondents were neutral to the provision of social services as related to economic development efforts. While it is acknowledged that community resources, cultural infrastructure, and basic social services are important to people when considering where to live, which is important in the attraction and retention of a high-quality workforce in the region, there are perceptions that some segments of the population have an 'entitlement' mindset for resources that others consider their own responsibility.

REGIONAL COORDINATION

The comments provided by survey respondents illustrate skepticism regarding the ability of the region to create and implement coordinated economic development initiatives.

2. IOWA RESERVATION-ECONOMIC SETTINGS

The Iowa Tribe of Kansas and Nebraska (“ITKN”) is a federally recognized Indian tribe. Its membership chose to organize under Section 16 of the federal Indian Reorganization Act of 1934 (the “IRA”). Accordingly, the governing organizational document of the ITKN is the Constitution and Bylaws of Iowa Tribe of Kansas and Nebraska (the “Constitution”), first adopted on February 26, 1937. According to the Constitution, there is a five-member Executive Committee which oversees ITKN operations and exercises the authority delegated to it by the Constitution¹. The ultimate governing authority is reserved to the General Council, which consists of all enrolled ITKN members who are at least 18 years of age². The ITKN also controls a federally chartered corporation established under Section 17 of the IRA. That entity does not currently engage in any business operations.

The operations of the ITKN are based on its federally established reservation covering approximately 12,038 acres³ across portions of Brown County and Doniphan County in Northeast Kansas and Richardson County in Southeast Nebraska. The reservation was established and modified according to a series of treaties, with the current boundaries established in the Treaty of March 6, 1861.

The ITKN reservation is adjacent to the reservation of the Sac and Fox Nation of Missouri in Kansas and Nebraska. A map of the reservation is attached below.

¹ Constitution and Bylaws of Iowa Tribe of Kansas and Nebraska, Art. IV, Sec. 2.

² Constitution and Bylaws of Iowa Tribe of Kansas and Nebraska, Art. IV, Sec. 1 and Art. V, Sec. 2.

³ Native American Wind Resource Atlas, U.S. Bureau of Indian Affairs Office of Indian Energy and Economic Development, Division of Energy and Mineral Development, 2010 Edition, p. 14.



Fig 1

The ITKN currently controls 5,024 acres of its reservation with most of this land held in trust status for ITKN by the United States⁴. The remainder of the reservation is held by various individuals and entities, most of whom are not members of the ITKN. Less than three per cent of the ITKN membership lives on the reservation today⁵. Tribal headquarters are located on reservation lands, west of White Cloud, Kansas.

In their effort to regain as much of the reservation as they can, the Nature Conservancy in Nebraska recently transferred 160 acres of Richardson County bluff land to the Iowa Tribe of Kansas and Nebraska.⁶

The Nature Conservancy and the Iowa Tribe agreed to a conservation easement, which prevents development that would be incompatible with the ecological value of the land. This is an aerial view of the property.

⁴ Conversations with Chairman Tim Rhodd, January 30, 2014.

⁵ Tribal enrollment records indicate a current living membership of 4,011. A 2012 census of households on the reservation counted 117 Indians as residents of the reservation. Assuming each is an ITKN member, which represents 2.9% of total ITKN membership.

⁶ <https://www.indianz.com/News/2018/04/02/iowa-tribe-reclaims-land-within-reservat.asp>

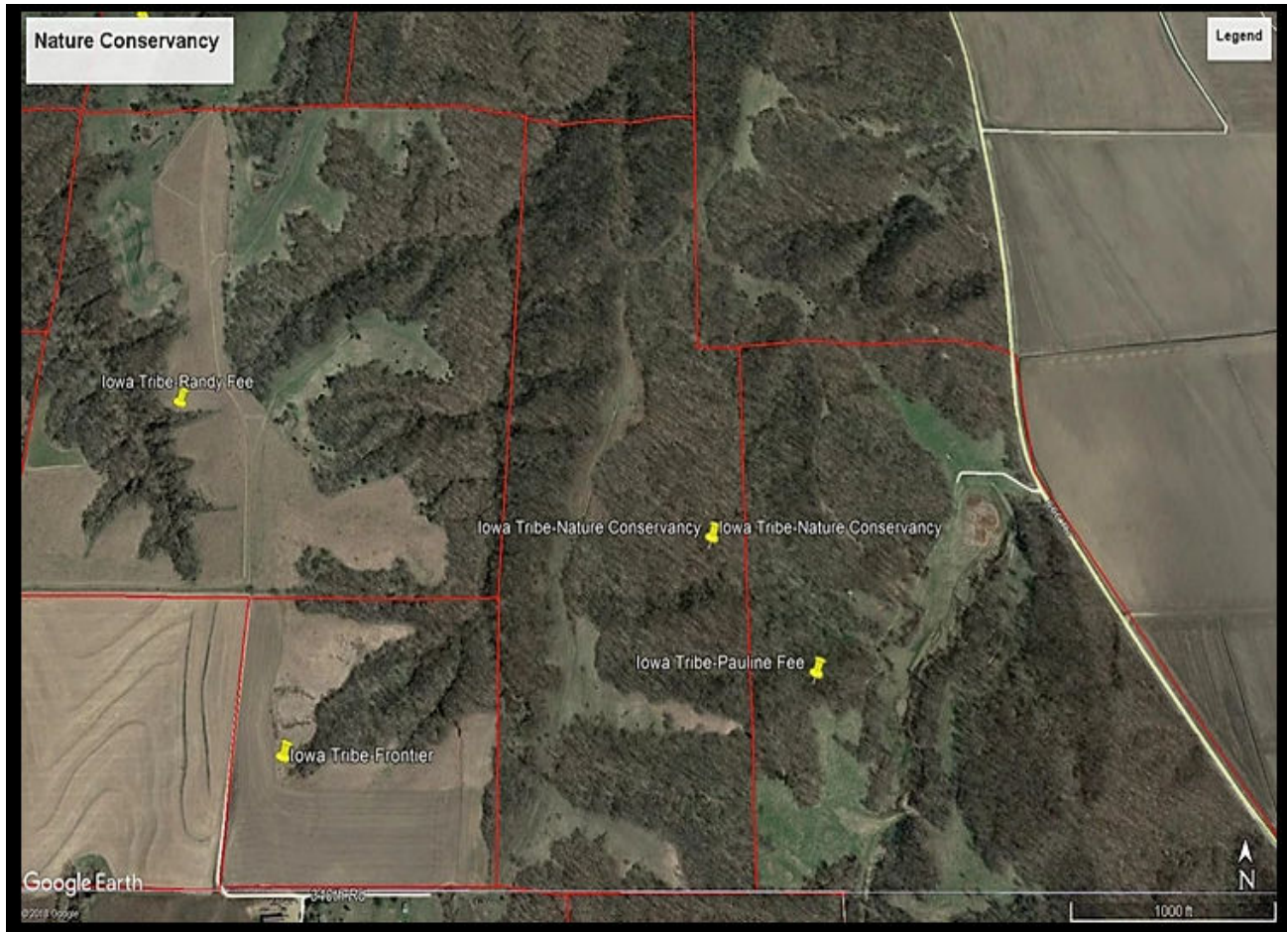


Fig 2

INFRASTRUCTURE AND SYSTEMS FOR ECONOMIC DEVELOPMENT

The major roads crossing the reservation are maintained with blacktop surface by the ITKN Road Maintenance Department, primarily funded by federal grants. Much of the developed portion of the reservation is served by the ITKN water utility, although several households still rely on well water. The ITKN water utility continues to explore an expansion of its network to cover the entire reservation with financial assistance from federal agencies. Landline telephone service and electric service are available from third-party service providers throughout the reservation, although reservation residents report that electric surges and outages are common. Broadband internet is available to most of the reservation through a recently completed ITKN fiber project. Service is contracted through a third-party provider.

There are no financial institutions with facilities located on the reservation. Accordingly, all reservation residents and businesses must obtain all financial services from institutions located off-reservation.

According to Chapter Two of the ITKN Code of Laws, the ITKN has established a court system. The tribal court is an important feature which supports business development.

Chapter Two, Section 2 of the Code addresses separation of powers. However, this provision can be amended by the Executive Committee or General Council action at any time. This may cause a perception by potential business owners, whether or not warranted, that the tribal courts could be subject to undue influence by either of those bodies.

The ITKN has passed several resolutions addressing taxation issues. Current ordinances provide a framework for sales and use taxes, gasoline taxes (although it appears these have been repealed), cigarette taxes, water taxes, and taxes on new construction on the reservation. There is no tax compact with the State of Kansas to address potential “double taxation” issues involving sales, use, or excise taxes. Thus, potential reservation-based businesses may be required to collect and remit both tribal and state/county taxes on transactions. This could be a disincentive to the creation of reservation-based businesses.

The ITKN Code includes a housing standards code and provisions addressing landlord-tenant matters. There is no zoning ordinance addressing planned development on the reservation. There are no ordinances addressing the creation and maintenance of corporations or limited liability companies under tribal law. There is no business licensing ordinance. There are no privacy or freedom of information ordinances addressing the controlled release of information possessed by the ITKN and its enterprises, although the ITKN Executive Committee has established some controls over the dissemination of information on Casino White Cloud as well as certain enrollment and election information. The ITKN and its related entities exercise Indian preference through a tribal employment rights ordinance.

2.1 IOWA TRIBE HISTORY, CULTURE AND LANGUAGE

The state of Iowa was named after the Iowa Tribe. The tribal name has had dozens of spellings throughout its history, but most commonly either Iowa or Ioway. The legal name used today by the northern part of the tribe is the “Iowa Tribe of Kansas and Nebraska,” since the reservation is situated in both Kansas and Nebraska. This Section 2.1 will use the “Ioway” spelling to signify the people and “Iowa” to signify the state, in order to avoid confusion.

Baxoje (BAH-kho-jeh) is the tribe’s name for itself in its own language, which is part of the Siouan language family. Traditionally, the Ioway people have called themselves some variation of Baxoje, with Ba meaning “snow” and Xoje “ashes or ash-colored.” Most use the translation “Gray/Grey Snow.”

Ioway aboriginal territory originally centered in their Iowa homelands, and extended into parts of surrounding states, from at least AD 1000 to about 1838. This midwestern homeland includes Iowa, Wisconsin, Michigan, Illinois, Minnesota, South Dakota, Nebraska, Kansas and Missouri.

2.1.1 ORIGIN TRADITIONS AND ARCHAEOLOGY

Oral tradition relates that the various clans (some lists say 7 and others 9) had different origins across the landscape, and from those places journeyed to meet and eventually form a single nation at a site called Red Banks, generally identified as a location near Green Bay, on Lake Michigan in Wisconsin. The nation eventually divided over time to become known later as the Hochunk, Ioway, Otoe, and Missouriia; some versions include the Omaha and a few others in this development.

Archaeological evidence seems to support this oral tradition, with the Late Woodland period (500-1000 CE, including the Effigy Mounds culture) of the upper Midwest corresponding to clan formation and migration, and the Upper Mississippian Oneota Tradition (1000-1600 CE) corresponding to the existence of the great nation. The separate tribal identities seem to have begun early, between 1300-1500 CE.

The Oneota Tradition developed large villages, of hundreds and even thousands of people, with extensive regional trade in pipestone, copper, and goods made from buffalo, such as hides and scapula hoes. The Ioway and Otoe were also guardians of the Pipestone quarry in Minnesota until about 1700. One of these ancestral Oneota sites is on the present reservation, a location now called the Leary Site National Historic Landmark, which was inhabited most intensively from AD 1200-1400.

2.1.2 CONTACT AND COLONIZATION (LATE 1600S-1836)

The first Europeans to contact the Ioway were French explorers who met them in Wisconsin, Minnesota, and Iowa by the late 1600s. The Ioway were noted as very successful horticulturalists, growing quantities of corn that the French needed for settlement. The Ioway also entered the European fur trade at this time. This was also a period of increasing intertribal conflict, with the Ioway withdrawing from the northern and eastern portions of their homelands in Minnesota and Wisconsin, while remaining in Iowa and expanding southward into northern Missouri.

Wars, migrations, tribal, and white expansion westward shuffled tribes around. Intertribal conflicts over territory continued through the 1700s and 1800s.

In 1803 the region was sold by France to the U.S. as part of the Louisiana Purchase, and Lewis and Clark expedition stopped on the future reservation, including the hilltop at the Leary Site NHL.

Ioway lifeways had remained fairly stable into the late 1700s, but beginning with the War of 1812 and into the 1820s, there was a tribal split, with the majority resisting American colonization, and one group taking a more neutral or even pro-American position. The Ioway population dwindled through epidemics and warfare.

With the end of the War of 1812, the treaty period began with the peace treaty of 1815, and

the American government recognized the pro-American faction as leaders. With treaties ceding Ioway traditional lands in Iowa and Missouri in 1824, 1825, and 1830. The period of Indian Removal began officially in 1830.

The Ioway began to unify again in these difficult conditions under Chief White Cloud I. White Cloud was a name used in succession by first a father, White Cloud or Mahaska I, and then his son (Francis) White Cloud II). Chief White Cloud II signed the 1836 Treaty known as the Platte Purchase, ceding the last Ioway homelands in Missouri, and providing for Ioway removal to a reservation established across the Missouri River south of the Big Nemaha River, to be shared with the Sac and Fox of the Missouri.

2.1.3 RESERVATION PERIOD (1837-2020)

1837-1854: Iowa Point and the Mission at Highland

Much of Ioway history can be seen as a struggle over land. In 1836, the Ioway had signed the Platte Purchase Treaty, which moved the tribe from St. Joseph, Missouri, across the Missouri River to “Indian Country”, in present day Kansas and Nebraska.

Within a year, the shared reservation was divided between the Ioway and the Sac and Fox. In the 1840s, Presbyterian missionaries established a mission and recorded the Ioway language as a tool for Christianization of the tribe. The log mission was replaced later with a brick building, which still stands near Highland, Kansas. Two more treaties ceded the last of Ioway aboriginal homelands in Iowa in 1837 and 1838.

Although about 1500 Ioways were relocated to the new reservation, the California gold rush and the Oregon Trail went through the reservation, and brought epidemics and sickness like smallpox and cholera, resulting in the population plummeting to about 300.

1854-1861: The Treaty of 1854

Settlers continued to demand more Indian land. Less than 20 years later, in 1854, another treaty was signed, surrendering about half the reservation land. This was to prepare for the Kansas-Nebraska Act, which created the territories of Kansas and Nebraska. The boundary line separating Kansas and Nebraska was surveyed at this time; this line divided the Ioway reservation into two states, which would result in the confusing name the Iowa Tribe of Kansas and Nebraska.

As a result of this treaty, the Ioway settlement and Indian agency were moved from Iowa Point, to a new location north near the Big Nemaha River, where in 1855 they established a village on the Kansas-Nebraska line called Nohart, after Chief No Heart, brother to White Cloud I.

A transition in agriculture was pushed by the government, from the older traditional corn, beans and squash, to crops like wheat and oats. Frame houses began to displace the bark lodges. Children were sent by the agents to boarding schools to learn non-Indian ways and

speak only English by forbidding traditional ways and language.

1861-1887: The Civil War and the Tribal Split

The Ioway's neighbors, the Sac and Fox, had ceded the rest of their reservation, and many were now landless. At the beginning of the Civil War, under the Treaty of 1861 the Ioway ceded the western half of the reservation to the Sac & Fox of the Missouri, where they live today, based in Reserve, Kansas.

During the Civil War (1861-1865), over 60% of Ioway men joined, and fought for the North. A monument to these men stands by the police station; Civil War tribal veterans are buried in all four of the tribe's cemeteries.

The aftermath of the Civil War saw a division in the tribe in the 1870s, with increasing pressures from land-hungry American settlers. A part of the tribe wished to remain on its lands in Kansas and Nebraska, and adjust to the changes, while the more traditionalist portion wished to move to live with other tribes in Indian Territory, which would become Oklahoma. The split resulted in the two Iowa tribes of today, the Iowa Tribe of Kansas and Nebraska, and the Iowa Tribe of Oklahoma, which are independent of each other, but recognize their shared history and relatedness.

Pressures had also been focused in the boarding schools to force tribes including the Ioway to give up Indian languages and ways of life. The decision to stay on the reservation also meant the choice to change to accommodate the new reality: To adapt to non-Indian ways in order to survive.

1887-1934: The Allotment Era on the Iowa Reservation

Many reservations across the U.S. now look like checkerboards of white and Indian ownership, as a result of the Dawes Act. The Dawes Severalty (aka Allotment) Act was enacted in 1887, dividing up communal tribal lands into private ownership. The aim was to destroy traditional cultures and unity, and a bonus from the non-Indian point of view was to alienate more Indian land to be sold to white speculators. The Ioway reservation was divided and allotted as individual land holdings beginning in 1887. The individual tracts were 160 acres for male heads of households, 80 acres for female heads of households, and 40 acres for orphans. By 1892, all of the reservation had been allotted.

In 1906, the Dawes Act was amended by the Burke Act, which accelerated taking allotments out of protected trust status through forcing fee patents on allotments. Any trust lands would be required to be divided equally among heirs. In many cases, within a few generations, the land became so fractionated due to the number of heirs that each heir had only a small parcel, too small to farm and settle on. Some allottees were cheated of their land through sharp business practices by local non-Indian businessmen. Debt resulted so that an allottee's lands had to be sold, or be lost through taxes or estate sales. By the 1930s, because of the Allotment Act, 90% of the reservation's lands were lost to non-Indian land

speculators.

In 1924, the Indian Citizenship Act finally made all Native Americans citizens of the U.S., although some Iowa had gained citizenship earlier through various ways, such as serving in the military.

1934-1946: The Indian New Deal: The IRA

When the Great Depression hit the reservation, times were very hard. One effect of the allotment period was the loss of almost all of the reservation's land base.

With the election of FDR and his administration's 1934 Indian Reorganization Act (IRA), the allotment era ended, stopping land loss. New Deal programs developed job opportunities and better infrastructure to support farming: better roads, farm terracing and shelterbelts to slow erosion of the soil. The Iowa Project of 1936 purchased some reservation land back from non-Indian owners so that the tribe could assign tracts for members to farm on. These tracts were put into trust and were called "assignments."

The IRA also established a new tribal government in 1937 with the first tribal constitution and enrolled membership. The form of government was modeled after U.S. corporations, with enrolled adult members voting for leadership, an Executive Committee. In effect, the general membership were not only citizens, they also became shareholders. The construction of a new stone community building, now on the National Register of Historic Places, provided work for the tribal members.

The Kansas Act of 1940 had opened the reservation to state jurisdiction, which eroded tribal sovereignty through complex tax and jurisdictional issues between the state of Kansas and the tribe.

World War II (1941-1945) brought more changes, with most tribal men and several tribal women serving in the military. Post-war there were many changes, with more people living and working away from the reservation due to a lack of opportunity. More and more also married outside the tribe, often to non-natives, and blood quantum thinned more and more.

1946-1975: Indian Land Claims and Termination

In 1953, the Termination Act brought an end to the tribal trust status of many tribes across the nation and opened tribal lands and resources to privatization. This was a disaster for the tribes that were terminated. Congress tried to terminate all four tribes of Kansas, but this was defeated by all four tribes working together under the leadership of Minnie Evans, a Potawatomi leader. Other tribes across the nation, like the Northern Ponca and the Menominee, were not as fortunate and decades of legal fights lay ahead for them.

The Indian Claims Commission had been established in 1946 to adjudicate the claims by many tribes, including the Iowa, that treaty payments had not been paid according to fair market value, or sometimes at all. In 1965, a settlement was made between the U.S. and

the Iowa Tribe of Kansas and Nebraska. The membership voted to establish a trust fund for the settlement and distribute the funds equitably to each member.

1975-2020: Tribal Self-Determination

The 1970s and 1980s ended the termination era and the beginning of the era of Self-Determination, where tribes finally had more control over their own destiny. The Indian Self-Determination and Education Assistance Act was passed in 1975. Community block grants and other assistance programs brought improvements in roads, housing, job training, new buildings, and new tribal services like the United Tribes and the USDA food program. In the 1980s, the tribe began its own farming operations and bought its first Black Angus heifers.

The new tribal administrative complex with its three buildings was constructed in the 1980s: the Administration Building, the George Ogden Jr. Community Building, and the White Cloud Clinic.

The Indian Gaming Regulatory Act of 1988 established gaming on the reservation: first tribal bingo and then Casino White Cloud through a compact with the state of Kansas. Gaming revenue goes back into running the tribe, roads, water, power, and other services to members. Grandview Oil, a gas station and convenience store on the reservation, provides fuel and food services to the area. When possible, revenue is also used to buy back former reservation lands, as a matter of sovereignty and economic well being, as most of the land bought back is farming land.

Developments continued from the 1990s into the 2010s. The Iowa Tribe Recreation building houses the gym and library and is the headquarters for the Boys and Girls Club. The Tribal Historic Preservation Office (THPO) was established in 2012.

Even with all these advances, however, other issues continued to be troubling and could not be sustained. Industrial monocrop farming practices, developed after WWII, had boosted agricultural productivity but also depleted and damaged the soil, requiring more and more expensive chemicals and other interventions. The corn and soybean market were volatile and oriented to large scale producers, and machine and chemical inputs were more expensive every year. The water quality was suffering due to increasing agrochemical infiltration and runoff.

In 2019 the tribe took a daring new direction focused on local economic resilience, food sovereignty, and regenerative agriculture to improve the health and prospects of its membership and the lands of the reservation. The new economic direction would be focused primarily on generational sustainability, valuing reservation lands and water as limited resources, while looking for economic growth opportunities that would aid in that sustainability. This also entails looking for opportunities off-reservation as well. The goal is a diversified but vertically integrated and sustainable, resilient local economy.

2.1.4 TRADITIONAL IOWAY CULTURE

The term “traditional” can be problematic as there has always been change. Things considered traditional may be centuries old or merely decades old. Here the term is considered to be what is called “the ethnographic present” - those aboriginal traits and ways considered by most to be an idealized period running from the period of first contact with Europeans to the establishment of the reservation and its early years (ca. 1700-1850).

The original traditional culture of the Iowa tribe at the time of settlement on the reservation was a blend of both Plains and Woodland cultural traits, as the Iowa’s aboriginal territory centered in what became the state of Iowa, which has a blend of Plains and Woodland geography. The Iowa culture is represented in the period AD 1000-1700 by the archaeological culture known as the Oneota. The Oneota gave rise to several related tribes - the Iowa, Otoe, Missouriia, and Hochunk - which all speak similar languages within the Siouan language family.

Plains traits included the economy of the yearly cycle of corn horticulture and bison hunting, along with warrior societies and horse nomadism on the open plains. Woodland cultural traits included trade and settlement in large agricultural villages with bark and mat lodges along large river systems, and dependence on woodland plant resources that inspired floral motifs in their material culture.

The social structure was based on a system of patrilineal clans divided into Sky and Earth groups, which alternated in annual governance, with the Bear clan leading during Fall and Winter, and the Buffalo Clan leading during Spring and Summer.

Traditional spiritual life was essentially clan-centered, with each clan having a series of sacred bundles, clan names, and ceremonies like Buffalo and Bear doctor societies.

Ioway spiritual and religious life was similar to related tribes like the Omaha and Hochunk: that of Wakanda, the spiritual force that sustained the universe, and which could be found throughout Creation in such locations as rivers, storms, bluffs, springs, forests, etc. Stories were an important way of cultural transmission from generation to generation, starting with the Creation story (Ma^Un the Earthmaker), Trickster Cycles, and the Clan Origin Stories.

The Ioway language is classified as part of the Siouan language family, with its closest languages Otoe-Missouria, Hochunk, and Omaha. The last fully fluent native speakers died in Oklahoma in the 1990s, but some members still use phrases and words, and occasionally pray and sing in the language.

There are continuing efforts to preserve our ancestral language and culture. The main cultural event on the reservation today is the Baxoje Fall Encampment, more commonly known as the Fall Powwow, held at the Iowa Tribe’s pow wow grounds the third weekend of every September. People return to the reservation to visit, camp, and celebrate their Ioway heritage.

The Tribal Historic Preservation Office (THPO), established in 2012, is the tribal advocate for traditional history and culture, working on compliance with federal laws like NHPA and NAGPRA, and managing tribal historic sites on the reservation like the Baxoje Wosgaci Museum (in the Iowa Community Building), the Chief James Whitecloud House, and the Leary Site National Historic Landmark.

Beginning in 2018, the Nature Conservancy began to transfer its Rulo Bluffs Preserve lands within the reservation to the tribe to be managed and protected in perpetuity as a natural and cultural preserve. Many food and medicinal plants grow in the preserve. In 2020, the tribe passed a resolution establishing Ioway Tribal National Park, made up of the Leary Site National Historic Landmark and the Rulo Bluffs Preserve Lands transferred to the tribe, both to be managed for their natural and cultural values in perpetuity.

Most landowners can always sell and move if things don't work out, but the Iowa tribe isn't going to get a new reservation. Our tribe has to make decisions not just for now, but for all the generations to come. The Iowa Tribe of Kansas and Nebraska must survive and thrive on this land between the Big Nemaha and the Missouri River for a thousand more years, and that means making decisions to care for our people, to ensure the health of the land and water, and to continue to adapt to a changing world.



Fig 3: Iowa Pipe



Fig 4: Pawnee earth lodge

2.2 DEMOGRAPHIC AND SOCIOECONOMIC DATA

2.2.1 POPULATION DATA

The American Indian/Alaska Native (AI/AN) peoples had a population of nearly 10 million before European settlers explored America. Their numbers began to fall rapidly shortly thereafter due to war and diseases brought by the settlers. Recent surveys show that the current total population of Native Americans in the United States is 6.79 million, or about 2.09% of the entire population.⁷

There are 4,011 enrolled Iowa tribe members, and 117 live on the Reservation. Members of other tribes make up the remainder of the Reservation American Indian population.

The number of individuals who identify themselves as being of AI/AN descent is estimated to be 75⁸, a slight decrease of 3 from the number of individuals that identify themselves to be of white descent. The Iowa Tribe, as a sovereign nation, has jurisdiction and the associated reality of providing public services to all people, with an emphasis on serving the tribe members, living within the Reservation boundaries. All tribal members are potentially eligible to access programs including education and general assistance.

The Reservation's population has been and continues to be an elderly population with a median age of 39.6.

The estimated population of Brown County in 2013 was 9,997.14. While this is a slight increase over the 2010 population of 9,984, this represents a decrease from the population

⁷ U.S Census Bureau

⁸ <https://www.census.gov/tribal/>

in 2000 (10,728) and 1990 (11,128)⁹. Between 2016 and 2017 the population of Brown County, KS declined from 9,810 to 9,736, a -0.754% decrease and in 2018, Brown County, KS had a population of over 9,000 people with a median age of 42.2.¹⁰

The estimated population of Doniphan County in 2013 was 7,851.¹¹ This represents a decrease of the population from 2010 (7,945), 2000 (8,249) and 1990 (8,134).¹² The estimated population of Doniphan County as of 2018 is reported to be 7,736.¹³

The estimated population of Richardson County in 2013 was 8,125¹⁴. This represents a steady decline in population from 2010 (8,363), 2000 (9,531) and 1990 (9,937)¹⁵. The estimated population of Richardson County as of 2018 is reported to be 8,009.¹⁶

The Brown and Richardson County portion of the reservation have a median age of 42.2 with a population of 9,664 people and 47.6 with a population of 8,009 respectively, while Doniphan County has a median age of 41.3 with a population of 7,736.¹⁷

The Median age of the total U.S. population remains at 37.5 according to the 2014 one-year ACS estimate. Age and gender statistics for all Reservation residents, as compared to the Brown, Richardson and Doniphan Counties are depicted in the following graph:

Sex and Age	ITKN	Brown County	Richardson County	Doniphan County
Total Population	173	9664	8009	7736
Male	85	4685	3974	3960
Female	88	4979	4035	3776
Under 5 Years	14	655	431	386
5 - 9	10	671	491	463
10 – 14	8	765	465	382

⁹ United States Department of Agriculture Economic Research Service (“USDA ERS”) County Level Data Sets/Population, <http://www.ers.usda.gov/data-products/county-level-data-sets/population.aspx#.VM0F8dLF-So>.
15 Id.

¹⁰ <https://censusreporter.org/profiles/05000US20013-brown-county-ks/>

¹¹ USDA ERS County Level Data Sets/Population

¹² Id.

¹³ <https://censusreporter.org/>

¹⁴ United States Department of Agriculture Economic Research Service (“USDA ERS”) County Level Data Sets/Population

¹⁵ Id

¹⁶ <https://censusreporter.org/profiles/05000US31147-richardson-county-ne/>

¹⁷ <https://censusreporter.org/>

15 – 19	12	533	435	860
20 – 24	14	498	378	580
25 – 34	16	996	770	779
35 – 44	25	1028	840	811
45 – 54	18	1200	992	912
55 - 59	22	743	570	460
60 – 64	11	722	734	663
65 – 74	11	1036	946	787
75 – 84	12	516	593	350
85 and above	0	301	364	295
Median Age (yrs)	39.6	42.2	48	41.3
18yrs and over	135	7202	6320	6239
65yrs and over	23	1853	1485	1396

Table 1 Source: ACS 2018 5-year

The population of Brown County, KS is 83.4% White Alone, 7.66% American Indian & Alaska Native Alone, and 4.17% Hispanic or Latino. N/A% of the people in Brown County, KS speak a non-English language, and 99.4% are U.S. citizens.

Doniphan County, KS is home to a population of over 7,000 people, from which 99.3% are citizens. As of 2017, 0.899% of Doniphan County, KS residents were born outside of the country (70 people). The ethnic composition of the population of Doniphan County, KS is composed of 7.03k White Alone residents (90.2%), 292 Black or African American Alone residents (3.75%), 213 Hispanic or Latino residents (2.73%), 152 Two or More Races residents (1.95%), 86 American Indian & Alaska Native Alone residents (1.1%), 17 Asian Alone residents (0.218%), 0 Native Hawaiian & Other Pacific Islander Alone residents (0%), and 0 Some Other Race Alone residents (0%).

The ethnic composition of the population of Richardson County, NE is composed of 7.44k White Alone residents (92.5%), 275 Two or More Races residents (3.42%), 154 Hispanic or Latino residents (1.91%), 146 American Indian & Alaska Native Alone residents (1.81%), 17 Black or African American Alone residents (0.211%), 14 Asian Alone residents (0.174%), 0 Native Hawaiian & Other Pacific Islander Alone residents (0%), and 0 Some Other Race Alone residents (0%).

Population statistics by race for all Reservation and County residents are depicted in the following graph:

Race	ITKN	Brown County	Richardson County	Doniphan County
Total Population	173	9664	8009	7736
One Race	158	—	—	—
White	78	8055	7397	6986
Black/African American	0	105	17	422
American Indian/Alaska Native	75	682	171	34
Asian	0	52	17	7
Native Hawaiian & Other Pacific Islander	0	0	0	0
Two or more races	15	345	250	72

Table 2 Source: ACS 2018 5-year

2.2.2 SOCIOECONOMIC DATA

The following data on industry, employment, worker classes, earnings, and households—except where specifically noted—was developed by the U.S. Department of Commerce Economics and Statistics Administration using U.S. Census Bureau data from the 2014-2018 American Community Survey, with estimates for each subsequent year created by the Bureau.

2.2.2.1 PER CAPITA INCOME AND COST OF LIVING

In recent years, Native Americans have increased their income and wealth through new and innovative economic development activities. For instance, tribes have increased their control over their natural resources and food systems, they have become players in the country’s energy sector, and they have begun trading with Asia (National Congress of American Indians 2013b). Despite these positive developments, however, Native Americans are still one of the United States’ most economically disadvantaged populations.

The per capita income of Brown County, KS was \$25,306 in 2018. The median property value in Brown County, KS is \$88,700, and the homeownership rate is 73%. Most people in Brown County, KS commute by Drive Alone, and the average commute time is 19 minutes. The average car ownership in Brown County, KS is 2 cars per household.

Incorporated cities located in Brown County include Everest, Fairview, Hamlin, Hiawatha,

Horton, Morrill, Powhattan, Reserve, Robinson, Sabetha, and Willis. Brown County is considered a “Non-Metro” county, meaning that it is outside the boundaries of a metro area and has no cities with 50,000 or more residents.¹⁸ Further, it has been assigned a Rural-Urban Continuum Code of 6, which means that it is a Non-Metro county having an urban population of 2,500 to 19,999 and is adjacent to a metro area.¹⁹ Along with Richardson County, Nebraska, Brown County is part of Commuting Zone 516, which had a population of 34,059 in 2000.²⁰ The county is categorized as “Nonspecialized” in terms of economic dependence.²¹

The per capita income of Doniphan County, KS was \$25,297 in 2018. The median property value is \$101,000 and the homeownership rate is 73%. Most people in Doniphan County, KS commute by Drive Alone, and the average commute time is 21 minutes.

Incorporated cities located in Doniphan County include Denton, Elwood, Highland, Leona, Severance, Troy, Wathena, and White Cloud. Doniphan County is considered a “Metro” county because it is an outlying county economically tied to a central metro county based on the share of workers commuting daily to the central metro county.²² It is part of the St. Joseph, MO-KS Metropolitan Statistical Area and has been assigned a Rural-Urban Continuum Code of 3, which means that it is a Metro county in a metro area with a population of less than 250,000.²³ Doniphan County is part of Commuting Zone 55, which had a population of 147,245 in 2000.²⁴ The county is categorized as economically dependent on manufacturing.²⁵

The per capita income of Richardson County NE was \$28,965 in 2018. The median property value is \$66,800, and the homeownership rate is 77%. Most people in Richardson County

¹⁸ USDA ERS Persistent Poverty Counties Data Set, last updated July 7, 2014, <http://www.ers.usda.gov/data-products/county-typology-codes.aspx>.

¹⁹ USDA ERS Rural Urban Continuum Codes, last updated May 10, 2013, <http://www.ers.usda.gov/data-products/rural-urban-continuum-codes.aspx>.

²⁰ USDA ERS Commuting Zones, last updated February 22, 2012, <http://www.ers.usda.gov/data-products/commuting-zones-and-labor-market-areas.aspx>. Commuting zones are intended to more closely reflect the local economy where people live and work than county boundaries. *Id*

²¹ USDA ERS County Typology Codes, last updated July 1, 2008, <http://www.ers.usda.gov/data-products/county-typology-codes.aspx>. Economic dependence was analyzed on the basis of labor and proprietors’ earnings by place of work in 1998, 1999, and 2000. Economic dependence categories were based on exporting industries concentrated in farming, mining, manufacturing, Federal/state government and service. A county not classified as dependent on any of these industries is termed Nonspecialized. <http://www.ers.usda.gov/data-products/county-typology-codes/documentation.aspx>.

²² USDA ERS Persistent Poverty Counties Data Set

²³ USDA ERS Rural Urban Continuum Codes.

²⁴ USDA ERS Commuting Zones.

²⁵ USDA ERS County Typology Codes. Economic dependence on manufacturing indicates that more than 25% of labor and proprietors’ earnings in 1998, 1999, and 2000 were attributable to manufacturing. <http://www.ers.usda.gov/data-products/county-typology-codes/documentation.aspx>.

NE commute by Drive alone and the average commute time is 17 minutes.

Communities located in Richardson County include the cities of Falls City and Humboldt and the villages of Barada, Dawson, Preston, Rulo, Salem, Shubert, Stella, and Verden. Richardson County is considered a “Non-Metro” county²⁶. Further, it has been assigned a Rural-Urban Continuum Code of 7, which means that it is a Non-Metro county having an urban population of 2,500 to 19,999 and is not adjacent to a metro area²⁷. Along with Brown County, Kansas, Richardson County is part of Commuting Zone 516, which had a population of 34,059 in 2000²⁸. The county is categorized as economically dependent on farming.²⁹ The table below shows the income-earning distribution by percentage in Brown, Doniphan and Richardson County by %.

Income Earnings Distribution (%)	Brown County KS	Doniphan County KS	Richardson County NE
Less than \$10,000	22%	26%	19%
\$10,000 to \$14,999	8%	7%	7%
\$15,000 to \$19,999	8%	7%	5%
\$20,000 to \$49,999	37%	35%	39%
\$50,000 to \$74,999	16%	17%	20%
\$75,000 to \$99,999	4%	4%	4%
\$100,00 and above	4%	4%	6%

Table 3 Source: ACS 2018 5-year

2.2.2.2 POVERTY

Areas with a high incidence of poverty often reflect the low income of their racial/ethnic minorities. Nonmetro Blacks/African Americans had the highest incidence of poverty in 2018 (31.6 percent), while nonmetro American Indians/Alaska Natives had the second-highest rate (30.9 percent). The poverty rate for non-metro Whites in 2018 was less than half as much (14.0 percent) of both groups. Nonmetro Hispanics had the third-highest poverty rate of any individual race or ethnicity—23.8 percent.

²⁶ USDA ERS Persistent Poverty Counties Data Set

²⁷ USDA ERS Rural Urban Continuum Codes

²⁸ USDA ERS Commuting Zones.

²⁹ USDA ERS County Typology Codes. Economic dependence on farming indicates either that farm earnings accounted for 15% or more of total county earnings in 1998, 1999, and 2000 or that farm occupations accounted for 15% or more of all occupations of employed county residents in 2000. <http://www.ers.usda.gov/data-products/county-typology-codes/documentation.aspx>.

Poverty rates by race/ethnicity and metro/nonmetro residence, 2018

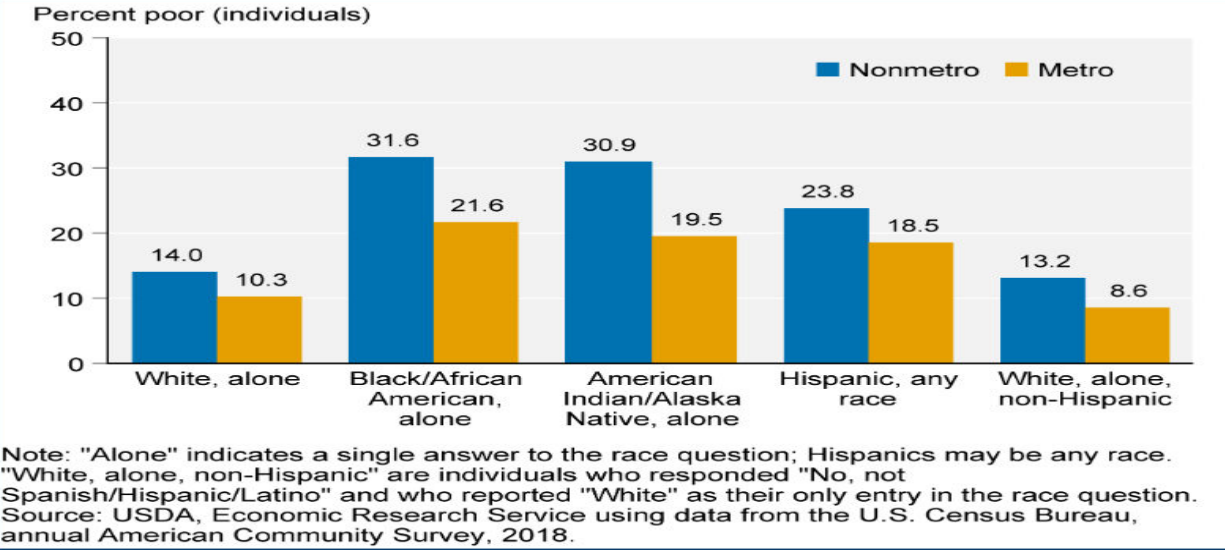


Fig 5

In 2011, about one in four American Indians and Alaska Natives³⁰ (26.4 percent) lived in poverty. In contrast, about one in 10 non-Hispanic whites (11 percent) lived in poverty (U.S. Census Bureau 2013). Not surprisingly, the Native American population is a relatively low-wealth population. In 2000, Native Americans’ median wealth was equal to only 8.7 percent of the median wealth among all Americans (Chang 2010, 14). For most Americans, a home is a key source of wealth. Native Americans, however, have a significantly lower homeownership rate than whites, and the homes they do own tend to be worth much less than those of whites (Insight Center for Community Economic Development 2009, 1).

According to ACS 2018 Census Data, 14.2% (over 1,000 people) of the population of Brown County, KS lived below the poverty line with the AI/AN having a 35% poverty rate.

USDA ERS does not identify Brown County as suffering from housing stress, low education, or low employment based on census data³¹. Further, the county is not considered to suffer persistent poverty or persistent child poverty³². Brown County is not viewed as a retirement destination county³³. Brown County has a low natural amenity ranking of 2³⁴. It is not

³⁰ In this paper “American Indian,” “Native American,” and “Native” will be used interchangeably to refer to American Indians and Alaska Natives, including the Hispanic and multiracial American Indian and Alaska Native populations.

³¹ USDA ERS does not identify Brown County as suffering from housing stress, low education, or low employment based on census data

³² USDA ERS County Typology Codes.

³³ USDA ERS County Typology Codes.

³⁴ USDA ERS Natural Amenities Scale, last updated September 30, 1999, <http://www.ers.usda.gov/data-products/natural-amenities-scale.aspx>. Brown County received a ranking of 2 on a scale of 1 to 7, with 1 being low. The scale measures physical characteristics of a county that enhance the location as a place to live and measures climate, topography and water area. Id.

considered to be a nonmetro recreation county³⁵.

14.6% (over 1,000 people) of the population of Doniphan County, KS lived below the poverty line with the AI/AN having a 36% poverty rate. USDA ERS does not identify Doniphan County as suffering from housing stress, low education, or low employment based on census data.³⁶ Further, the county is not considered to suffer persistent poverty or persistent child poverty.³⁷ Doniphan County is not viewed as a retirement destination county.³⁸

Doniphan County has a low to mid-range natural amenity ranking of 3.³⁹ Because it is considered a Metro county, Doniphan County was not analyzed for purposes of determining status as a nonmetro recreation county.

Over 1000 people (13.2%) of the population of Richardson County NE lived below the poverty line with the AI/AN having a 37% poverty rate.

USDA ERS does not identify Richardson County as suffering from housing stress, low education, or low employment based on 2000 census data⁴⁰. Further, the county is not considered to suffer persistent poverty or persistent child poverty⁴¹. Richardson County is not viewed as a retirement destination county⁴². Richardson County has a low to mid-range natural amenity ranking of 3⁴³. It is not considered to be a nonmetro recreation county⁴⁴.

The table below is a breakdown of the poverty rate in Brown, Doniphan and Richardson County by race:

Race	Brown County KS	Doniphan County KS	Richardson County NE
White Poverty Rate	13%	14%	13%
Black Poverty Rate	4%	29%	

³⁵ USDA ERS County Typology Codes. This determination is based on analysis of (1) income tied to entertainment and recreation, accommodations, eating and drinking establishments, and real estate, (2) housing units intended for seasonal or occasional use, and (3) per capita receipts from motels and hotels.

<http://www.ers.usda.gov/data-products/county-typology-codes/documentation.aspx>

³⁶ USDA ERS County Typology Codes

³⁷ USDA ERS County Typology Codes; USDA ERS Persistent Poverty Counties Data Set.

³⁸ USDA ERS County Typology Codes

³⁹ USDA ERS Natural Amenities Scale.

⁴⁰ USDA ERS County Typology Codes

⁴¹ USDA ERS County Typology Codes; USDA ERS Persistent Poverty Counties Data Set

⁴² USDA ERS County Typology Codes.

⁴³ USDA ERS Natural Amenities Scale.

⁴⁴ USDA ERS County Typology Codes

American Indian Poverty Rate	35%	36%	37%
Asian Poverty Rate	10%	100%	71%
Hispanic Poverty Rate	42%	35%	2%

Table 4

The table below is a breakdown of families (on the reservation) whose income in the past 12 months is below the poverty level:

Percentage of Families and People Whose Income in the Past 12 Months is Below the Poverty Level	Estimate
All families	0.0%
With related children of the householder under 18 years	0.0%
With related children of the householder under 5 years only	0.0%
Married couple families	0.0%
With related children of the householder under 18 years	0.0%
With related children of the householder under 5 years only	-%
Families with female householder, no husband present	0.0%
With related children of the householder under 18 years	0.0%
With related children of the householder under 5 years only	0.0%
All people	5.8%
Under 18 years	0.0%
Related children of the householder under 18 years	0.0%
Related children of the householder under 5 years	0.0%
Related children of the householder 5 to 17 years	0.0%
18 years and over	7.4%
65 years and over	0.0%
People in families	0.0%
Unrelated individuals 15 years and over	31.3%

Table 5

2.2.2.3 EDUCATIONAL ATTAINMENT

According to the ACS, 5-year estimate for 2014 - 2018, the Iowa Tribe population within the

reservation has a 91.3% high school or equivalency completion rate for 25 years and above.

The total population of Brown County, KS has a 92.6% high school or equivalency completion rate⁴⁵ with the AI/AN population of 25 and above, having a 35.1% completion rate (ACS 2019).

The Richardson County NE population has a high school or equivalency 93.2% completion rate⁴⁶, while with the AI/AN population of 25 and above, having a 43.5% completion rate.

The Doniphan County, KS population has a high school or equivalency 90% completion rate⁴⁷, while with the AI/AN population of 25 and above, having a 47.5% completion rate.

The gap in education attainment widens at the bachelor's degree level. While 5.2% of the reservation population of 25+ had attained a bachelor's degree or higher, the percentage of all people in Brown County, KS with a bachelor's degree or higher was 21.8% with the AI/AN population of 25+ having a 6.7% completion rate.

In Richardson County NE, 43.4% of the AI/AN 25+ population have attained a bachelors' degree, as compared to 18.3% of County's total population while the Doniphan County, KS AI/AN 25+ population has 47.5% bachelor's degree completion rate as compared to 19.4% of the County's total population.

The total completion rate for a bachelor's degree or higher for the 25+ population of Brown, Richardson and Doniphan county are 22%, 19%, 20% respectively.

The trend showing an increase in degree attainment is positive news for Indian country, yet AI/AN overall achieve a lower degree of educational attainment than white people living in both counties.

The following table presents a detailed illustration of the education levels completed by 115 Tribal members, ages 25+, a survey conducted by the ACS, a 5-year estimate for 2014 - 2018. Tribal members reported that they were currently enrolled in school or college. 91% of these Tribal members were enrolled in undergraduate college (6.3%); another 5.2% were seeking a graduate-level degree. The level of education attainment reported by Tribal members provides a reason for optimism regarding future Tribal economic prospects.

School Enrollment	Estimate
Population 3 years and over enrolled in school	37
Nursery school, preschool	5

⁴⁵ <https://censusreporter.org/profiles/05000US20013-brown-county-ks/>

⁴⁶ <https://censusreporter.org/profiles/05000US31147-richardson-county-ne/>

⁴⁷ <https://censusreporter.org/profiles/05000US31147-doniphan-county-ks/>

Kindergarten	2
Elementary school (grades 1-8)	13
High school (grades 9-12)	6
College or graduate school	11

Table 6

Educational Attainment	Estimate
Population 25 years and over	115
Less than 9th grade	1
9th to 12th grade, no diploma	9
High school graduate (includes equivalency)	63
Some college, no degree	25
Associate's degree	11
Bachelor's degree	4
Graduate or professional degree	2
Percent high school graduate or higher	91.3%
Percent bachelor's degree or higher	5.2%

Table 7

2.2.2.4 UNEMPLOYMENT RATE

The unemployment rate for American Indians in 2018 was reported by the Bureau of Labor to be 6.6% while it was only 3.5% for whites⁴⁸. The unemployment rate among American Indian males was even higher than this suggests--6.9% compared to the white male unemployment rate of 3.5%. The male American Indian unemployment rate was two times as large as that for whites. For American Indian women, the unemployment rate was 6.3% compared to 3.4% for white women.

In 2018 the Brown County, KS overall unemployment rate was reported to be 2% while that

⁴⁸ <https://www.bls.gov/opub/reports/race-and-ethnicity/2018/home.htm>

of Richardson County NE was reported to be 2.6%⁴⁹. The overall unemployment rate for Doniphan County, KS was reported to be 2.8%.

The table below displays the employment status of the 16+ population on the reservation:

Employment Status	Estimate
Population 16 years and over	139
In labor force	101
Civilian labor force	101
Employed	96
Unemployed	5
Armed Forces	0
Not in labor force	38
Civilian labor force	101
Unemployment Rate	5.0%

Table 8

2.2.2.5 LABOR FORCE CHARACTERISTICS

According to the ACS Community Survey 5-year estimate (2014-2018), the Reservation had approximately 139 people over the age of 16. Of those, 101 were considered to be in the labor force, with 96 employed and 5 out of work. These numbers include both Tribal members, members of other tribes and non-Indians.

Of the 101 Native Americans and non-Indians who were employed in 2018, 67 were employed in private industry and 23 were employed in Tribal, federal, state or local government. The “local government category” includes Tribal, city and county governments as well as education employment within the local schools. The employees of Tribally-owned businesses are also categorized as Tribal government employees within the Census Bureau American Community Survey.

The majority of those employed in the private sector were employed within the Service Industry. Within that industry, the largest sectors were in Educational/Health Care (18

⁴⁹ Bureau of Labor Statistics

jobs) and Arts/Entertainment (27 jobs).

The table shows the number of people employed in various occupations on the reservation:

Occupation	Estimate
Civilian employed population 16 years and over	96
Management, business, science, and arts occupations	35
Service occupations	27
Sales and office occupations	10
Natural resources, construction, and maintenance occupations	13
Production, transportation, and material moving occupations	11

Table 9

The following is a breakdown of reservation workers by class:

Class of Worker	Estimate
Civilian employed population 16 years and over	96
Private wage and salary workers	67
Government workers	23
Self-employed in own not incorporated business workers	6
Unpaid family workers	0

Table 10

The table shows the number of civilians employed in various industries on the reservation:

Industry	Estimate
Civilian employed population 16 years and over	96
Agriculture, forestry, fishing and hunting, and mining	12
Construction	6
Manufacturing	9
Wholesale trade	0
Retail trade	3
Transportation and warehousing, and utilities	2
Information	0
Finance and insurance, and real estate and rental and leasing	0
Professional, scientific, and management, and administrative and waste management services	2
Educational services, and health care and social assistance	18
Arts, entertainment, and recreation, and accommodation and food services	27
Other services, except public administration	1
Public administration	16

Table 11

2.2.3 INCOME AND OTHER CHARACTERISTICS

2.2.3.1 EMPLOYMENT BY INDUSTRIES

From 2016 to 2017, employment in Brown County, KS declined at a rate of -0.628%, from 4.62k employees to 4.59k employees. The most common employment sectors for those who

live in Brown County, KS, are Health Care & Social Assistance (761 people), Manufacturing (733 people), and Retail Trade (449 people).

The most common industries in Brown County, KS, by the number of employees, are Health Care & Social Assistance (761 people), Manufacturing (733 people), and Retail Trade (449 people). The least common industries are Wholesale Trade (87 people), Professional, Scientific and Technical Services (84 people), and Utilities (44 people).

Compared to other counties, Brown County, KS has an unusually high number of Agriculture, Forestry, Fishing & Hunting (5.99 times higher than expected), Arts, Entertainment, & Recreation (2.98 times), and Manufacturing (1.58 times) industries.

From 2016 to 2017, employment in Doniphan County, KS declined at a rate of -1.03%, from 3.78k employees to 3.74k employees. The most common employment sectors for those who live in Doniphan County, KS, are Manufacturing (581 people), Health Care & Social Assistance (567 people), and Educational Services (501 people).

The most common industries in Doniphan County, KS, by the number of employees, are Manufacturing (581 people), Health Care & Social Assistance (567 people), and Educational Services (501 people). The least common industries are Professional, Scientific and Technical Services (41 people), Information (36 people) and Utilities (30 people).

Doniphan County, KS has an unusually high number of Agriculture, Forestry, Fishing & Hunting (6.88 times higher than expected), Manufacturing (1.54 times), and Educational Services (1.45 times) industries.

From 2016 to 2017, employment in Richardson County, NE declined at a rate of -0.703%, from 3.98k employees to 3.95k employees. The most common employment sectors for those who live in Richardson County, NE, are Health Care & Social Assistance (690 people), Manufacturing (445 people), and Construction (439 people).

Industries	Brown County		Doniphan County		Richardson County	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Health Care & Social Assistance	761	16.6	567	15.2	690	17.5
Educational Services	364	7.93	501	13.4	254	6.42
Manufacturing	733	16	581	15.5	445	11.3
Retail Trade	449	9.78	272	7.28	229	5.79
Arts, Entertainment & Recreation	301	6.56	87	2.33	133	3.36
Public Administration	326	7.1	237	6.34	237	5.99
Agriculture, Forestry, Fishing & Hunting	325	7.08	304	8.13	357	9.03
Construction	255	5.56	254	6.8	439	11.1

Admin & Support & Waste Management Services	117	2.55	86	2.3	75	1.9
Professional, Scientific & Technical Services	84	1.83	41	1.1	113	2.86
Transportation & Warehousing	149	3.25	164	4.39	219	5.54
Utilities	44	0.96	30	0.8	168	4.25
Finance & Insurance	137	2.99	144	3.85	139	3.52
Information	93	2.03	36	-	67	1.69
Real Estate & Rental & Leasing	32	0.80	23	-	31	0.78
Wholesale Trade	87	1.9	82	2.19	106	2.68
Other Services Except for Pubic Admin	219	4.77	192	5.14	107	2.71
Accommodation & Food Services	-	-	129	3.45	127	3.21
Mining, Quarrying, & Oil & Gas Extraction	-	-	-	-	18	-
Total	4590		3740		3950	

The most common industries in Richardson County, NE, by the number of employees, are Health Care & Social Assistance (690 people), Manufacturing (445 people), and Construction (439 people). The least common industries are Wholesale Trade (106 people), Administrative & Support & Waste Management Services (75 people), and Information (67 people).

This chart shows the share breakdown of the primary industries for residents of Brown, Doniphan, KS and Richardson County, NE, though some of these residents may live in the Counties, and work somewhere else. Census data is tagged to a residential address, not a work address.

Table 12

2.2.3.2 HOUSEHOLD INCOME

Households in Brown County, KS have a median annual income of \$48,547, which is less than the median annual income of \$63,179 across the entire United States. This is in comparison to a median income of \$44,672 in 2016, which represents a 5.13% annual growth.

Doniphan County, KS has a median annual household income of \$49,338. This is in comparison to a median income of \$49,375 in 2016, which represents a 1.87% annual growth.

Households in Richardson County, NE have a median annual income of \$48,096, which is less than the median annual income of \$63,179 across the entire United States. This is in

comparison to a median income of \$45,929 in 2016, which represents a 1.98% annual growth.

The following chart shows how the median household income on the reservation compares to that of its neighboring and parent geographies.

Income and Benefits (In 2018 inflation-adjusted dollars)	Iowa Reservation (Number of Households)	Brown County KS Number of Households	Richardson County NE Number of Households	Doniphan County KS Number of Households
Total households	71	3904	3772	3024
Less than \$10,000	5	231	241	180
\$10,000 to \$14,999	2	130	233	125
\$15,000 to \$24,999	3	455	562	432
\$25,000 to \$34,999	15	575	362	363
\$35,000 to \$49,999	13	604	571	430
\$50,000 to \$74,999	9	863	710	637
\$75,000 to \$99,999	11	457	475	330
\$100,000 to \$149,999	12	354	462	403
\$150,000 to \$199,999	1	148	59	64
\$200,000 or more	0	87	94	60
Median household income (dollars)	\$44,375	\$48,547	\$48,096	\$49,338

Table 13

The following is a breakdown of reservation workers by insurance coverage:

Health Insurance Coverage	Estimate
Civilian noninstitutionalized population	173
With health insurance coverage	146
With private health insurance	119
With public coverage	55
No health insurance coverage	27
Civilian noninstitutionalized population under 19 years	40
No health insurance coverage	10

Table 14

The following is a breakdown of reservation workers by way of commute to work:

Commuting to Work	Estimate
Workers 16 years and over	93
Car, truck or van- drove alone	79
Car, truck or van- carpooled	5
Public transportation (excluding taxicab)	0
Walked	3
Other means	0
Worked at home	6
Mean travel time to work (minutes)	25.2

Table 15

2.2.3.3 HOUSING

According to the 2014-2018 American Community Survey 5-Year Estimates, the total number of housing units on the reservation are 75 of which 71 are occupied. 50 of the housing units are owner-occupied while the other 21 are renter-occupied units. The following tables depict the housing statistics, mortgage, housing value and rent on the reservation.

Housing Occupancy	Estimate
Total Housing Units	75
Occupied Housing Units	71
Vacant Housing Units	4
Homeowner Vacancy Rate	3.8%
Rental Vacancy Rate	0

Table 16 Source: ACS 2014-2018 5-year

Housing Tenure	Estimate
Occupied Housing Units	71
Owner Occupied	50
Renter Occupied	21

Average Household Size of Owner-Occupied Unit	2.40
Average Household Size of Renter Occupied Unit	2.52

Table 17 Source: ACS 2014-2018 5-year

Year Householder Moved into Unit	Estimate
Occupied Housing Units	71
Moved in 2017 or Later	0
Moved in 2015 to 2016	7
Moved in 2010 to 2014	11
Moved in 2000 to 2009	28
Moved in 1990 to 1999	12
Moved in 1989 and earlier	13

Table 18 Source: ACS 2014-2018 5-year

Value	Estimate
Owner Occupied Units	50
Less than \$50,000	10
\$50,000 to \$99,000	17
\$100,000 to \$149,999	15
\$150,000 to \$199,999	6
\$200,000 to \$299,999	2
\$300,000 to \$499,999	0
\$500,000 to \$999,999	0
\$1,000,000 or more	0
Median	\$93,300

Table 19 Source: ACS 2014-2018 5-year

Mortgage Status	Estimate
Owner Occupied Units	50
Housing Units with a Mortgage	24
Housing Units without a Mortgage	26

Table 20 Source: ACS 2014-2018 5-year

Selected Monthly Owner Costs (SMOC)	Estimate
Housing Units with a Mortgage	24
Less than \$500	3
\$500 to \$999	8
\$1000 to \$1499	7
\$1500 to \$1999	4
\$2000 to \$2499	2
\$2500 to \$2999	0
\$3000 or more	0
Median	\$1050
Housing Units with a Mortgage	26
Less than \$250	5
\$250 to \$399	12
\$400 to \$599	4
\$600 to \$799	4
\$800 to \$999	1
\$1000 or more	0
Median	\$350

Table 21 Source: ACS 2014-2018 5-year

Gross Rent	Estimate
Owner Occupied Housing Units Paying Rent	20
Less than \$500	7
\$500 to \$999	13
\$1000 to \$1499	0
\$1500 to \$1999	0
\$2000 to \$2499	0
\$2500 to \$2999	0
\$3000 or more	0
Median	\$563
No rent paid	1

Table 22 Source: ACS 2014-2018 5-year

2.3 PHYSICAL SETTING

The Iowa Reservation straddles the borders of southeast Richardson County in the south-eastern part of Nebraska and Brown and Doniphan Counties in north-eastern Kansas.

According to the major physical divisions of the United States, the reservation area is located in the Central Lowland Province of the Interior Plains. The Central Lowland Province in Kansas is further divided such that the study area lies mostly within the Dissected Till Plains Section but also includes a small area of the Osage Plains Section. These sections were divided further into the Osage Cuestas, the Flint Hills Upland, the Kansas Drift Plains, and the Attenuated Drift Border.

The Osage Cuestas comprise the area south of the Kansas River as far west as Wabaunsee County and, in eastern Kansas, consist of at least 18 southwest-to northeast irregularly trending east-facing escarpments between which are flat to gently rolling plains. The crest of each escarpment, ranging in height from less than 50 ft to more than 200 ft, is capped by a resistant limestone underlain by weaker shale or sandstone.



Fig 6: Physiographic division of region Source: US Geological Survey

The Flint Hills Upland is a north-south trending physiographic unit extending across the entire State. Its eastern limit is generally defined by outcrops of flint-bearing limestone bedrock of Permian age. The Flint Hills Upland only occurs in the southwestern part of the reservation. The surface features, geologic structure, and erosional history of the upland are mostly the same as the topographically lower Osage Cuestas to the east.

The Dissected Till Plains, which covers most of the reservation area, occurs north of the Kansas River and is a northward extension of the Osage Plains because the underlying bedrock of both sections is identical. The basic difference between the two sections is that the Dissected Till Plains have been glaciated, but the Osage Plains have not. In the Dissected Till Plains, a mantle of drift conceals or covers the cuesta-type topography, which prevails in the Osage Cuestas to the south. Bedrock-controlled topography does not occur in the Dissected Till Plains except near its southern edge along the Kansas River Valley and on the west along the Big Blue River. This part of the Dissected Till Plains Section has been

designated as the Attenuated Drift Border, and the rest of the section in Kansas is known as the Kansas Drift Plains.

Although the Attenuated Drift Border subdivision along with the Big Blue, Little Blue, and Kansas River Valleys is glaciated and included in the Dissected Till Plains Section, the area has a bedrock-controlled type of topography and is mostly like the Flint Hills Upland and Osage Cuestas to the south. The area differs in that it has been glaciated and covered by isolated deposits of till, outwash, and erratic of ice-transported boulders, cobbles, and pebbles

The topography of the Kansas Drift Plains reflects a gently undulating, drift-controlled, erosion surface. Distant from major streams, the broad, smooth, well-rounded, inter stream areas are remnants of the uneroded original ground moraine deposited by the last retreating ice sheet. Beneath this surface lie glacial deposits of boulder till, sand and gravel, silt, and clay. The bedrock valleys with preglacial dendritic drainage patterns lie deeply buried by as much as 400 ft of glacial deposits. Near larger stream valleys, the land surface becomes more dissected and is reduced to gentle slopes and broad and open valleys.

Next to the larger stream valleys, the surface is very dissected, rough, and hilly, with steep valley walls of limestone and shale. The greatest topographic relief (300 ft) in the Kansas Drift Plains occurs in a narrow strip a few miles wide along the bluffs of the Missouri River where the upland surface is deeply incised into a very rugged region of hills between steep-sided valleys and ravines. Most drainage in the Kansas Drift Plains is to the Big Blue, Big Nemaha, Missouri, and Kansas Rivers.

The extreme north-eastern part of the reservation (Richardson County in Nebraska and parts of Brown and Doniphan Counties in Kansas) lies in the floodplain and terrace system associated with the Missouri River. The floodplain and low terraces of the Kansas River trend east-west in the southern part of the study area. Other areas of flood plains and low terraces occur along some of the larger tributaries of the Missouri and Kansas Rivers and include

- (1) Walnut Creek and the Wolf River in the Missouri River Basin and
- (2) Soldier Creek, Cross Creek, Mill Creek, Vermillion Creek, Rock Creek, and the Delaware River and its tributaries in the Kansas River Basin. Floodplains and terraces also may extend a short distance up the valleys of many of the smaller streams that are directly tributary to the Missouri and Kansas Rivers.

2.3.1 CLIMATE

Located in the Interior Plains, northeastern Kansas and southeastern Nebraska have a typical continental climate that is characterized by large variations in temperature and precipitation throughout the year and from year to year. This part of the Interior Plains is classified as moist sub humid but can range from semiarid to humid for any given year.

Daily precipitation often exceeds daily evapotranspiration in this area, with the excess either becoming runoff or entering the soil to become groundwater.

During intervals of precipitation deficiency and high temperatures, evapotranspiration can remove large quantities of surface water and shallow soil water resulting in drought conditions. The long-term average annual precipitation (1888-1991) for Horton, Kansas, of 34.23 in. (National Oceanic and Atmospheric Administration, 1992-94) is representative of the reservation area. Slightly more than 70 per cent of the annual precipitation comes during the April-to-September growing season.

One year out of four will have less than 28 in. of precipitation, and one out of four will have more than 40 in. The driest year on record was 1988 when only 19.31 in. precipitation fell, and the wettest year was 1951 with 62.64 in. of precipitation. “

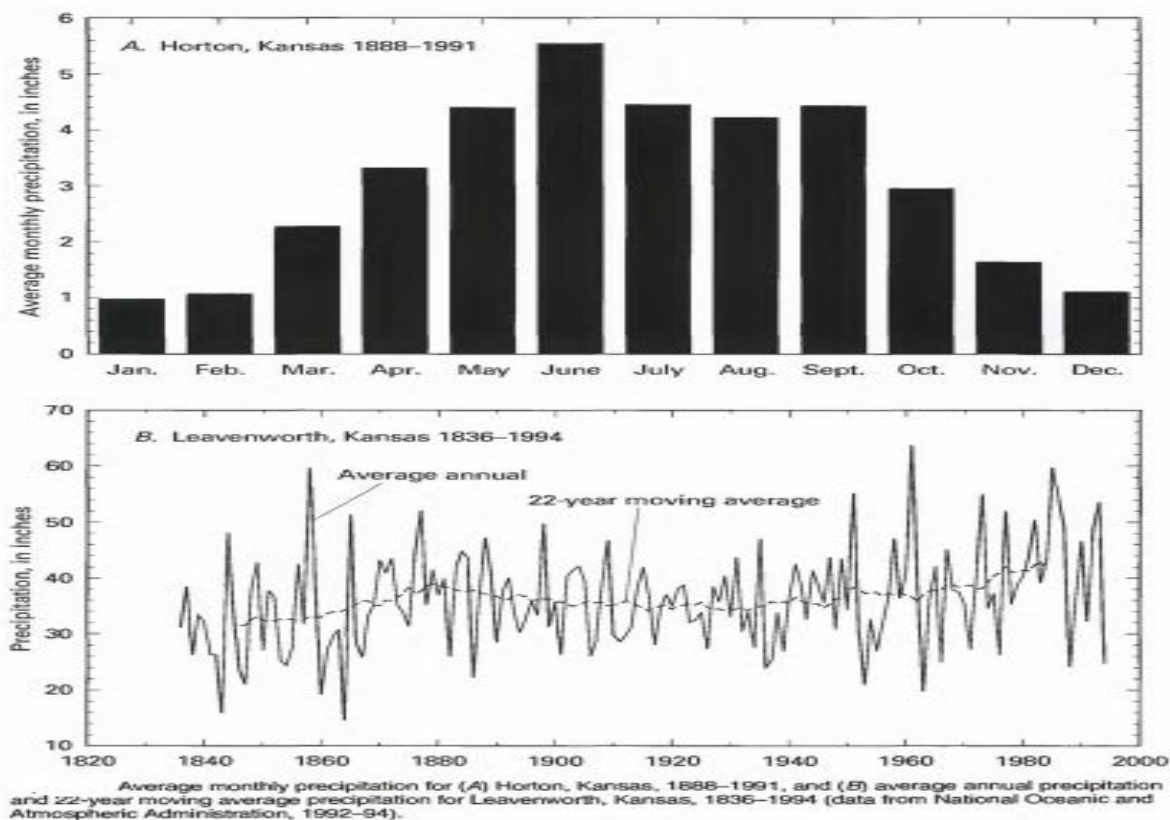


Fig 7 Source: US Geological Survey

In addition, the ITKN has responded to the EDA Environmental Guideline’s list of suggested information to be included in a Comprehensive Economic Development Strategy (CEDS Appendix B). This list provides information on designated national parks, protected wildlife, and aquifer and well sites on ITKN lands.

2.3.2 SOILS

The climate on the reservation area is a sub-humid continental type where soils have developed at an intermediate rate. In the wetter parts of the area, many soils have clay accumulations that limit the soil permeability, thus restricting downward water movement. Natural vegetation in the study area is diverse and related to the climate. The amount of organic matter in the soil is largely dependent on the decay of root systems. Grasslands, particularly tall-grass prairie, add large amounts of organic matter to the soil. Short-grass prairie produces less organic material; therefore, soils are lighter in color.

Woodland soils usually have only a thin surface layer of organic matter, mostly from leaf decay; because root decay is much less under woodland conditions than under grassland conditions. Under warm, moist conditions leaching prevents the accumulation of organic matter in the upper soil horizons.

Increased rainfall from April to June over the past 30 years—the single trend with the highest impact on agriculture in the region, has reduced flexibility for the timing of spring planting, increased soil erosion, and sparked elevated levels of mold, fungi, and toxins.

Due to climate change and change in landscape, flooding has been occurring more with increased frequency that in turn creates water above soil levels. Water in soil (water-logging) or above the soil surface (flooding) means there is much less oxygen available to plants. Living plant tissues, including roots, require oxygen for respiration from which high energy compounds are made. These compounds are required for nearly all other life reactions. Low oxygen availability means that the entire process of respiration slows. If oxygen levels decrease too much, plant respiration changes to a pathway similar to fermentation. While some life-sustaining energy is produced during fermentation, energy production is reduced by up to 95 percent. So, one effect of low oxygen is drastically reduced metabolism, which can sharply reduce yield and, if long enough in duration, cause death to a portion or the entire plant.

Daily minimum temperatures have also increased in all seasons, in part due to increased humidity. Higher humidity decreases the day-night temperature range and increases warm-season precipitation. Rising humidity also leads to longer dew periods and high moisture conditions that favor many agricultural pests and pathogens for both growing plants and stored grain. Increases in spring humidity through mid-century are expected to increase rainfall, which will increase the potential for soil erosion and further reduce planting-season work days due to waterlogged soil.

2.3.3 MINERALS

Stone: The north-eastern corner of the reservation is bordered on the east by the Missouri River. Bed-rock formations are well exposed along the eastern edge of the reservation in the ravines carved by tributaries of the Missouri. The uplands to the west, however, are veneered with glacial deposits.

A large tonnage of limestone was quarried during 1935 in eastern Doniphan County, mainly for use as riprap along the Missouri River. A relatively small amount was used for road metal and concrete. A few thousand tons of sandstone were likewise quarried in this county during 1935 for highway use.

Water: The valleys bordering the reservation are floored with alluvium consisting primarily of reworked glacial materials which are sufficiently coarse in many places to contain an adequate supply of water for local use. Some farm supplies are obtained from previous layers in the glacial drift.

Most of the water obtained in the northeastern border of the reservation comes from valley-fill aquifers. This section of Kansas is veneered with glacial deposits, and consequently, much of the valley alluvium consists of coarse sand and gravel, in which large quantities of water are stored. The glacial till itself is too erratic in texture to be a consistent source of groundwater, but glacial outwash gravels yield abundant water. Water is also present in the bed-rock formations, but as a general rule is mineralized at depths below 200 feet.

Undeveloped Mineral Resources Doniphan County: Six tests for oil and gas have been drilled in Doniphan County. Four of these did not penetrate below the Cherokee shale, one went through the "Mississippi lime", and one, in sec. 21, T. 1 S., R. 19 E., went into Siluro-Devonian formations at a depth of 2,281 to 2,315 feet, total depth., Doniphan County lies on the east flank of a large syncline known as the Forest City Basin. This part of Kansas has not yet been adequately tested for oil and gas.

Volcanic ash has been reported from Eagle Springs near Sparks, in the northern part of the county. No information is available as to the size of this deposit.

Sand and gravel deposits occur in the south-western part of the county, and along the eastern edge in the bed of the Missouri River.

Undeveloped Mineral Resources Brown County: The presence of glacial drift over most of the surface of Brown County has retarded geological exploration for favorable places in which to drill test wells for oil and gas. Several decades ago, a diamond drill hole was put down at Horton to a depth of 1,108 feet. Only the Pennsylvanian beds were penetrated by this well.

Limestone is exposed in the stream valleys that penetrate through the glacial drift. Quarry sites have been found in south-eastern and west-central Brown County.

Sand and gravel deposits occur in the south-eastern and south-central parts of the county.

2.3.4 ENVIRONMENTAL QUALITY

The Reservation enjoys a Class II Air shed rating, of which are managed by the Tribes' Environmental Protection programs with assistance from the U.S. Environmental

Protection Agency.

A diverse variety of wildlife inhabits the Reservation. During the prehistoric and historic periods, deer were present in the timbered areas along streams and slopes, along with bears, squirrels, and cottontail rabbits. Jackrabbits were common along with coyotes, badgers, mink, bobcats, and foxes. Wolves were also important predators until exterminated from the region in the late 1800s.

Numerous other mammals and rodents also inhabit the region. Numerous species of birds inhabit the grasslands, the shrublands, and wooded areas of the region. Wild turkey, quail, ruffed grouse, and prairie chicken represented some of the regional game birds, as well as migratory waterfowl, in both prehistoric and historic times. Numerous grassland and forest species of songbirds are present. Reptiles include several species of lizards, turtles, and snakes Collins. Amphibians are found in the prairies, forests, and wetlands.

Fish, including catfish, carp, and bass, and freshwater mussels are found in the streams throughout the region. Insects and other invertebrates abound throughout the region with the grasshopper being one of the most abundant insect groups.

Below is a list of some of the mammals and rodents inhabiting the region (both present and historic:

Present	Present	Present	Present	Historic
whitetail deer	skunk	cottontail rabbit	Wild Turkey - Eastern	river otter
cougar (occasional reports)	weasel	woodrat, vole,	River Otter	bison
bobcat	opossum	bat	Groundhog	elk
coyote	beaver	mole	Bobwhite Quail	Black bear
red fox	muskrat	Geese - Canadian, Snow,& Speckle Belly		wolf
raccoon	Squirrel- Red & Gray	Ducks - Mallard, Wood, Pintail, & Canvasback		mink
badger	flying squirrel	Ringneck Pheasant		Jackrabbit

Table 23

2.3.5 LAND-BASED CULTURAL RESOURCES

Cultural resources are precious Tribal resources. They encompass the Tribes' elders, languages, cultural traditions, and cultural sites. They include the wildlife and plants

native to the region, and landforms and landmarks. Tribal elders and the languages are perhaps the most vital of these resources because they teach and communicate the histories and traditional lifestyles of the Tribes. Traditions depend on land-based cultural resources which include native fish and wildlife and their habitats, food and medicinal plants and the areas where they grow, prehistoric and historical use sites, and other land areas where Tribal members currently carry on cultural traditions.

Hunting, fishing, plant harvesting, hide-tanning, food and medicine preparation, singing, dancing, praying, feasting, storytelling and ceremonies are examples of age-old traditions that rely on the land and the community of life it supports.

The Tribe on the Reservation possesses distinctive beliefs and practices and the people share one important similarity: Tribal people value the Earth—its air, water and land— as the foundation of Indian culture.

2.3.6 LAND USE

Present land cover in the reservation is very different from the original vegetative cover that existed before the influx of native tribes relocated from the east in the early to middle 1800s followed by the influx of non-native settlers in the middle 19th century.

These changes in land cover were due to:

- (1) Massive conversion of native vegetative cover to agricultural uses,
- (2) Wildfire suppression, which favored more woodland cover over prairie cover, and
- (3) The introduction of exotic (non-native) plant and animal species to the region.

Present land use on the reservation is dominantly agricultural (mostly cropland or pastureland, but includes orchards, nurseries, confined feeding operations, and other agricultural use). Forestland, which occurs mostly in the eastern half of the reservation area, is minor but is the second most important land cover in this part of the area.

Forestlands may have been more widespread than that before extensive settlement. In the area, the largest forest land areas are along the Missouri River and around Perry Lake. Other smaller forestland areas are found scattered throughout the eastern part of the reservation, mostly as riparian forestlands along rivers and streams, and as individual shelterbelt, fence-row, or woodlot areas.

In the western half of the reservation, rangeland is the second most prevalent land use, after agricultural land. In the south-western part of the study area, especially in the area south of the Kansas River, rangeland is the dominant land use. Minor urban areas (towns) are scattered throughout the area.

2.3.7 LAND OWNERSHIP

The Iowa reservation consists of 12,000 acres (49 km²) that are almost evenly divided

between the states of Kansas and Nebraska. The reservation includes parts of Brown and Doniphan counties in Kansas and Richardson County in Nebraska. The tribe and its members only own 5,024 acres, about 30 percent of the land with most of its land held in trust status for ITKN by the United States.

The remainder of the reservation is held by various individuals and entities, most of whom are not members of the ITKN. Less than three percent of the ITKN membership lives on the reservation today.

In their effort to regain as much of the reservation as they can, the Nature Conservancy in Nebraska recently transferred 160 acres of Richardson County bluff land to the Iowa Tribe of Kansas and Nebraska.

2.4 INFRASTRUCTURE

Access to transportation, availability of public infrastructure and access to distribution channels strongly influence how an area looks to potential investors and new residents. An area can lead or follow when taking proactive steps for infrastructure improvements to meet the needs of new generations and markets.

2.4.1 WATER/WASTEWATER

The Iowa Reservation has a small water system managed by the ITKN. Most rural residences on the Reservation use individual septic tanks and drain fields for sewage disposal. The tribe is also in the process of connecting to Brown County as an emergency backup for water supply, as well as drilling three alternate test wells on the reservation.

The state of Kansas allocates its surface water and groundwater resources for the beneficial use of the public and the management of the resource for the use of generations of Kansans to come. Several laws guide the provision of water in Kansas, including the Kansas Water Appropriation Act, the Groundwater Management District Act, and the Kansas Water Banking Act. However, the Kansas Water Appropriation Act is the principal law under which water in Kansas is administered, managed, and regulated. The law is administered by the Division of Water Resources (DWR) within the Kansas Department of Agriculture. Under the Kansas Water Appropriation Act, it is illegal for individuals in Kansas to use water for other than domestic purposes without holding a water right from the DWR. Domestic use is defined as the use of water by any family unit for household purposes, watering farms and domestic animals, and watering lawns, orchards or gardens not exceeding two acres in size.

Kansas Water Office River Basins

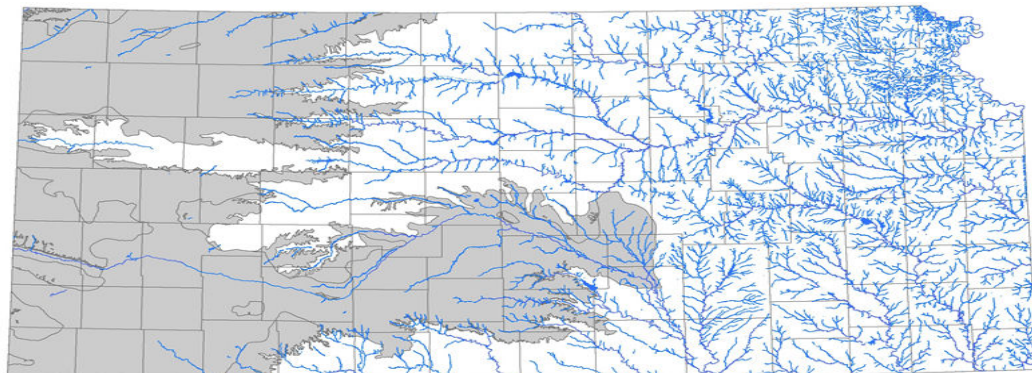


Source: Institute for Policy & Social Research, The University of Kansas; data from Kansas Geological Survey, Kansas Data Access & Support Center.

Fig 8

How water is accessible varies throughout the state as a result of the three Köppen climate classifications present in Kansas. The parts of the eastern portion of the state experience significantly more rain than the semi-arid steppe climate found in the western portion of the state. As a result, much of the eastern portion accesses surface water and precipitation for agricultural, industrial, recreational, and municipal needs. The western portion of the state relies upon quickly depleting groundwater sources, such as the High Plain Aquifer, for most agricultural and industrial needs. The map below shows the High Plains Aquifer and all of the perennial surface water sources throughout the state.

High Plains Aquifer and Perennial Surface Water Resources in Kansas



Source: Institute for Policy & Social Research, The University of Kansas; data from U.S. Geological Survey, National Hydrography Dataset and Kansas Geological Survey, Kansas Data Access & Support Center.

- Perennial Rivers & Streams
- Perennial Waterbodies (greater than one square kilometer)
- High Plains Aquifer

Fig 9

Public Water Supply Sources in Kansas

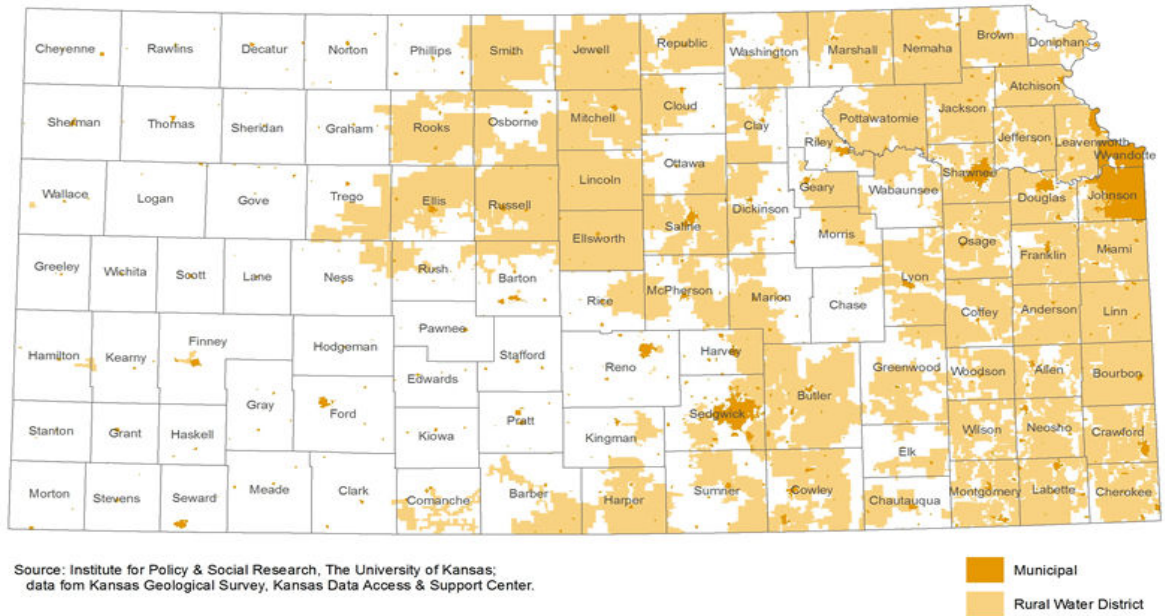


Fig 10

2.4.2 SOLID WASTE DISPOSAL

Grey Snow Sanitation operates the only licensed waste disposal service on the Reservation. Reservation residents who live on the Reservation have their waste collected by Grey Snow Sanitation (a private waste collection and disposal company) for a fee. Non-allowable items are:

- Tires
- The metal of any kind
- Carpet
- Lumber
- Batteries
- Furniture
- Mattress
- Tree Limbs
- Oil
- Shingles
- Grass Clippings

2.4.3 ELECTRICITY AND ENERGY

The Tribe has approximately 30 generators that may be used on loan. The Tribe has determined three categories of households that will have priority to the generators. Priority will be households with individuals with medical conditions that require electricity to treat (i.e., oxygen, breathing machines, etc.). Second priority will be households with seniors 55 years old or older. Third priority will be households with children 5 years old or younger. If there are generators left, after these households are served, generators will be given on loan on a first-come, first-serve basis.

Generators are filled with gas when delivered and households are required to return it full as well. Borrowers are responsible for hooking up the generator. The generators are not big enough to power an entire house.

There are also stand-alone generators that supply electricity to each of the following buildings during power outages:

Grandview Oil, White Cloud Health Center, Iowa Tribe Multipurpose Building (Police Department, Title IV Senior Citizens Mealsite, Native American Family Services- N.A.F.S., Iowa Tribe Communications-Broadband, Water Treatment Plant, Casino White Cloud)

2.4.4 COMMUNICATION

IOWA Reservation communications services include internet, telephone and television.

2.4.4.1 BROADBAND, INTERNET, TELEVISION AND TELEPHONE

The Tribe currently owns and offers internet (broadband) and phone services on the reservation, provided by Rainbow Communications to the residents of the reservation. Prices vary by plan.

According to 2014-2018, American Community Survey 5-Year Estimates 81.7% of households on the reservation have a computer while 66.2% of households have a broadband internet subscription.

2.4.4.2 RADIO

AM and FM radio stations in Brown, Doniphan and Richardson County cover the Reservation.

2.4.5 EMERGENCY SERVICES/ SAFETY

2.4.5.1 POLICE AND FIRE PROTECTION

The Iowa Tribal Police and Fire Department has been serving the residents of the Iowa Reservation and the surrounding communities, as well as Casino customers since its inception in May of 1996. The Department was started with a Federal Grant through the

Department of Justice in 1996. As a result, 24-hour Police coverage has been provided for the past 20 years.

At present, the Iowa Tribal Police Department consists of 6 full-time and 2 part-time officers, including the Chief of Police and the Administrative Assistant. As the reservation lies in both the States of Kansas and Nebraska, the Police Officers are certified in both states. The Police Department also maintains a K-9 drug unit.

There are also additional services available for Reservation residents and surrounding members by request: Farm Security checks and Residential Security checks. Farm security checks allow the police department to check on farm equipment or machinery that has been left in fields in and around the Reservation area. This is especially useful when residents are absent or at night.

The Residential Security checks serve a similar purpose. When residents are away on vacation or for an extended period, the department will perform daily, periodic checks of the residence. The department also offers vehicle unlocks (if keys have been accidentally locked in a vehicle), and vehicle jump-starts.

The volunteer fire department consists of 12 volunteers that live within the community. The fire department provides its service to the reservation and surrounding counties and cities, and maintains a fleet of two brush trucks, one pumper truck, and one tanker truck. Most of the equipment on hand is outdated and in need of updating and/or replacement.

The reservation lacks Emergency Medical Services (EMS), as the Tribe lacks a service unit for EMS calls. At present, events requiring emergency medical treatment must rely on ambulances located in surrounding counties with response times of up to 30 minutes, and an additional 30 minutes to transport the patient to the hospital. This is a much-needed service as response time is critical during an emergency. The lack of EMS also directly impacts the elderly population living on the reservation as the unavailability of emergency services often means that those with medical conditions are unable to return home.

2.4.5.1 ROAD MAINTENANCE

The purpose of the Road Maintenance Department is to maintain the reservation and approximately 14 miles of access roads in a clean and safe condition. The Road Maintenance eligible activities include BIA road systems and related road striping, trail markers, guardrails, highway bridges, drainage structures, adjacent parking areas, maintenance yards, pedestrian walkways, paths, bikes, motorized vehicle trails, and parking lots. The Road Maintenance Department employs two full-time positions.

2.4.6 HEALTH SERVICES

The White Cloud Health Center LLC, is located on the Iowa Tribe of Kansas and Nebraska Reservation. It is located close to the Nebraska and Missouri state borders, near the town of White Cloud, KS. The clinic includes a lab, four treatment rooms, a two-chair dental suite,

pharmacy, and will soon offer chiropractic services. The White Cloud Health Center (WCHC) is staffed by an Endocrinologist/Internal Medicine Physician, and an experienced Physician's Assistant. WCHC has an RN/Diabetes Nurse Educator, a Registered nurse, an LPN, a pharmacist, a benefits coordinator, and several support staff. The health center also has two Community Health Representatives who provide transportation and other services to improve access to healthcare. A family nurse practitioner will be brought on in the near future.

Services offered include general family medicine (pediatrics through geriatrics), acute care, chronic disease management, endocrinology services, omens' health, and dental care. The benefits coordination services include assistance with applying for social security benefits/disability benefits and Medicaid benefits. They help patients research supplemental plans during open enrollment. The WCHC contracts for services including specimen testing, x-ray, podiatry, dental care, eye care and specialty provider services. The clinic is an appointment-based clinic offering outpatient, general and family practice medicine including laboratory testing.



Fig 11

2.4.6.1 NATIVE AMERICAN FAMILY SERVICE

The Iowa tribe offers the following family services:

Elder Protection: Relates to the safety, security & protection of our elders. If abuse or neglect is suspected, a social worker will investigate the circumstances and offer services or seek legal involvement if necessary.

Independent Living: Is a program geared toward teens that have been or are currently in Foster Care. The program focuses on preparing youth for their future and living independently. Continuing education and job skills training are fundamental to the program.

Foster Care: Foster Care provides an alternative home environment for children whose own home the court system has declared as unsafe. However, reintegration with the parents/custodian is the ultimate goal. During the reintegration process, the Foster Care Social Worker provides counselling, supervises visits between the children and the parents/custodians, and works with the courts in preparing and monitoring reintegration plans. For the cases where reintegration cannot occur, the program provides long-term foster care and assistance with adoptions. The Indian Child Welfare Act of 1978 guides placement of child/children.

Social Services: Based on the needs of the individual, the Social Services Program helps with tribal enrolment, counselling, assistance with policy and procedures when involved with other agencies, legal referral, housing assistance, mediation, transportation, employment referrals, and schools' issues. The broadly based Social Services Program services people in a myriad of areas.

Child Protective Services: The CPS Social Worker investigates reports received from school, neighbors, police and/or family members regarding alleged abuse/neglect of children. Upon completion of the investigation, the worker can file, if necessary, petitions to the court, refer the family for services or close the investigation.

Family Preservation: Family Preservation works with families who are at high risk of having their children removed from the home. Parenting skills individual, family counselling, budgeting, respite care, and acquisition of basic needs such as decent housing are examples of the services provided. Family Preservation is an intensive program with many hours spent each week with families in their homes/communities rather than in an office setting. Family Preservation teaches, supports and encourages families. Caseloads are low in number to ensure the maximum amount of time goes into helping the families keep their children.

Indian Child Welfare: The Indian Child Welfare Act of 1978 is a complex federal law that prevents Native American children from being placed in non-Indian environments away from relatives and tribal culture. The Act gives the Tribe authority to intervene in any State court on cases involving tribal children. Interventions and monitoring cases in out of state services areas are the primary activity of the Social Worker. The Social Worker works with children placed in foster care on reservations and provides Foster parent training.

2.4.7 TRANSPORTATION

2.4.7.1 ROADS

Nearly 67.4 miles (108 km) of Tribal, BIA, other Federal, state, city and county roads exist on the Iowa Reservation, including:

- County Road System – 28.4 miles (45.7 km)
- Bureau of Indian Affairs (BIA) Roads – 25.5 miles (41 km) – all of which are on the IRR
- Tribal Road – 13.5 miles (21.7 km)
- State Road – 17.7 miles (28.4 km)
- 11 bridges of which 8 are BIA owned and 3 are Tribal owned

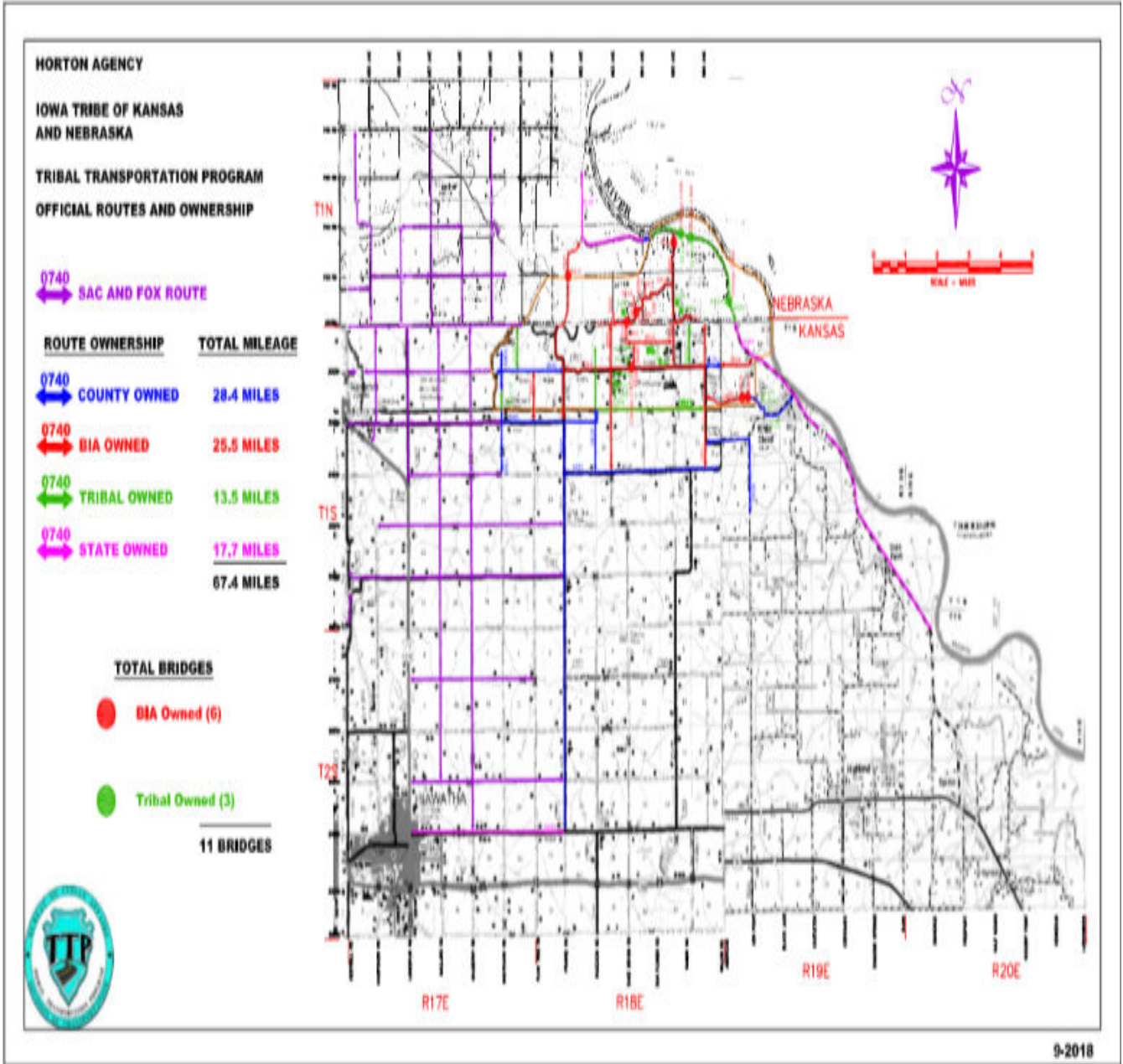


Fig 12 Source: BIA

Brown County is a County Township Road System. There are 35 County Township Road Systems in the State of Kansas. Brown County Road System consists of 276 miles of asphalt. Townships combined consist of 774 miles of maintained roads. There are 199 bridges maintained by the County. Of those 199 bridges, 141 bridges are Off-system bridges, and 58 are Rural Secondary bridges. Below is the highway map for Brown County, Kansas.

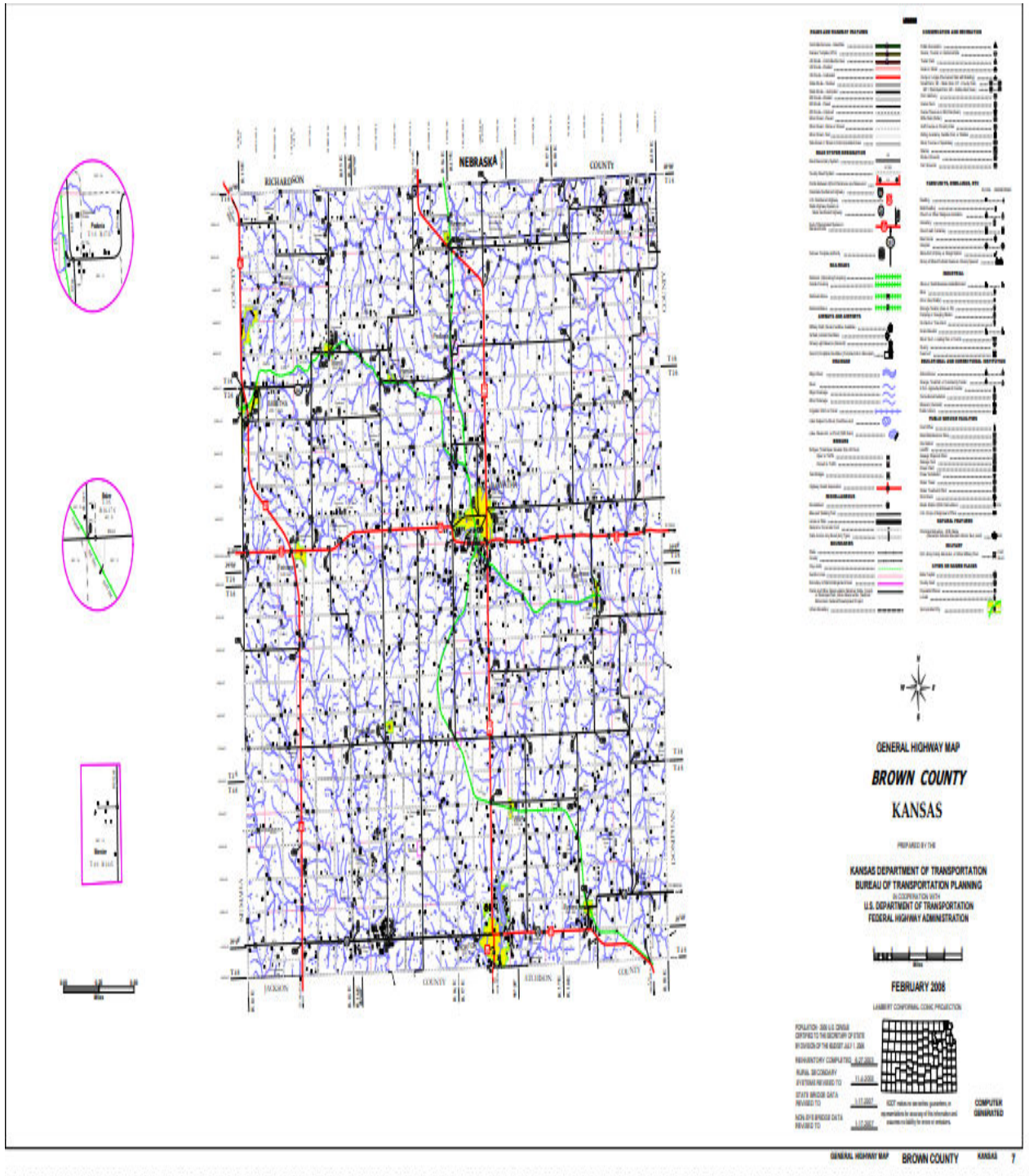


Fig 13 Source: <https://www.ksdot.org/Assets/wwwksdotorg/bureaus/burTransPlan/maps/county-pdf/brown.pdf>

Doniphan County maintains over 73 miles of paved roads and over 400 miles of gravel and dirt roads. The condition of these roads varies greatly.

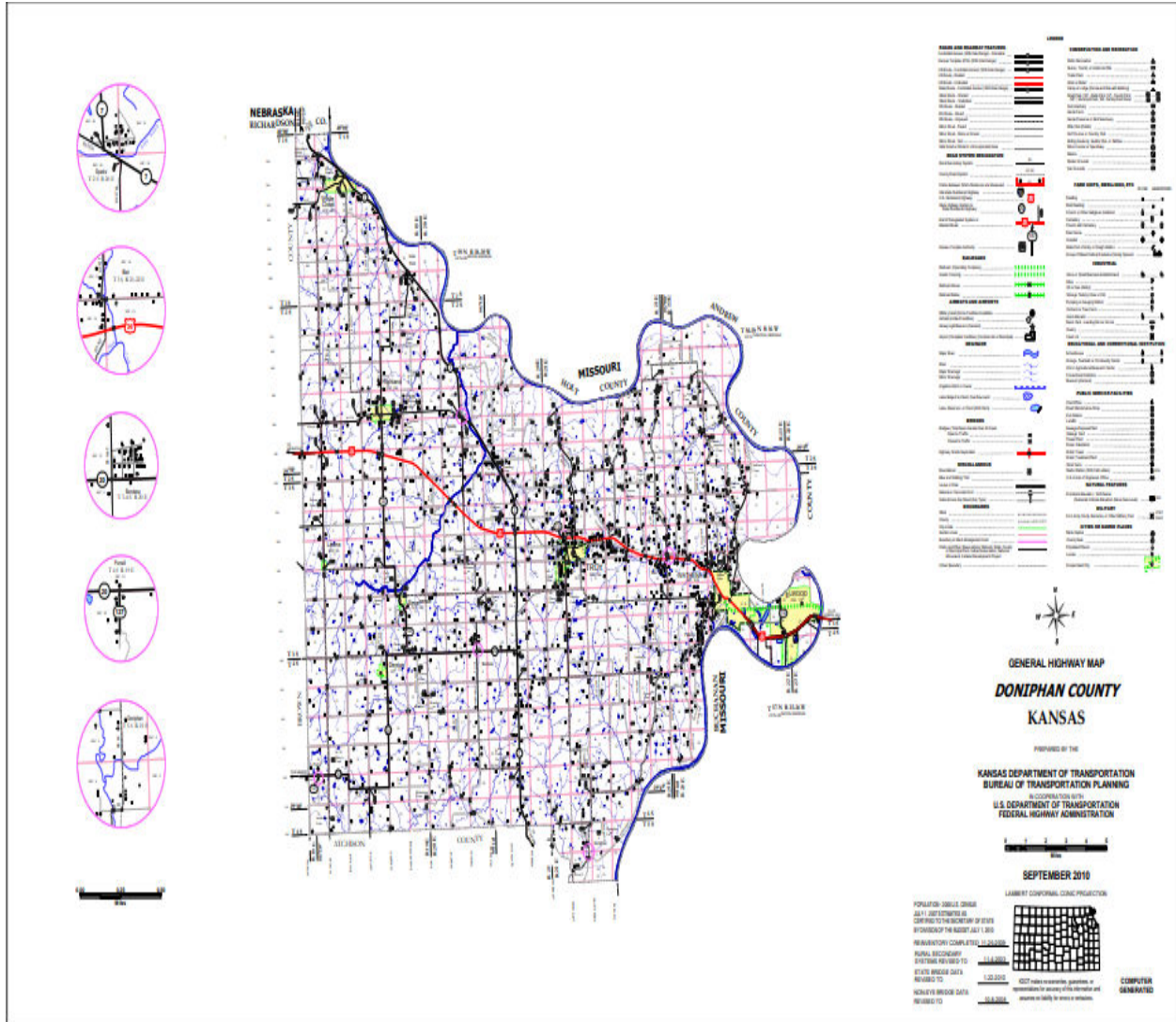


Fig 14 Source: <https://www.ksdot.org/Assets/wwwksdotorg/bureaus/burTransPlan/maps/county-pdf/doniphan.pdf>

2.4.7.2 AIRPORTS

No public airports exist on the Reservation however, there are several airports near the Reservation including:

Brenner Field Airport: This airport is located one nautical mile northeast of the central business district of Falls City, Nebraska

Horton Municipal Airport: This airport is located 1-mile NW of Horton, KS, at an elevation of 1134 feet. Its runway is 2223 by 100 ft and 1636 by 100 ft.

Sabetha Municipal Airport: This airport is located 1-mile E of Sabetha, KS, at an elevation of 1330 feet. Its runway is 3100 by 40 ft.

Amelia Earhart Airport: This airport is located 2 miles W of Atchison, KS, at an elevation of 1,073 feet. Its runway is 3,000 by 48 ft.

2.4.7.3 RAIL

The nearest train route from the reservation is the Missouri River Runner. The Missouri River Runner is a 283-mile (455 km) passenger train route operated by Amtrak running between Gateway Transportation Center in St. Louis and Kansas City Union Station in Kansas City, Missouri. Four trains operate daily (two round trips) on this route: 311 and 313 westbound, and 314 and 316 eastbound.



Fig 15 Source: americanrails.com

2.4.7.4 TAXI CABS

There are no taxi cab services on the Reservation. There is however a shuttle that can pick residents up (for a fee) to take them to get groceries, haircuts etc.

2.4.8 EDUCATIONAL FACILITIES

Education is a key factor for the economic well-being of Tribal members, and for creating a strong workforce. ITKN operates multiple educational programs and schools to promote knowledge about Tribal culture, incentives for education, and employment opportunities. These programs include:

- Higher Education Program

- Adult Education Program
- Lynn Roubidoux Scholarship
- Johnson O'Malley Program
- Peace Program

2.5 EXISTING TRIBAL BUSINESSES AND REVENUE-PRODUCING PROGRAMS

2.5.1 TRIBAL ENTERPRISES

The ITKN owns the following parent corporations. Each is governed by a Board of Directors who report to the Shareholder (the Tribal membership), who are represented by the Executive Council.

2.5.1.1 CASINO WHITE CLOUD

Casino White Cloud is operated as a proprietary enterprise fund of the ITKN. While operating figures are confidential, this business operates at a profit and has historically accounted for a significant portion of non-grant revenues for all ITKN operations. The casino conducts gaming operations according to the federal Indian Gaming Regulatory Act (“IGRA”), the ITKN gaming ordinance, and the Tribal-State Compact between the ITKN and the State of Kansas.

Gaming offerings include bingo, table games, and slot machines. The casino derives additional revenues from its food and beverage operations⁵⁰ and modest lodging receipts⁵¹ derived from four cabins near the casino property. The casino has approximately 110 full-time employees and approximately 15 part-time employees. Approximately thirty percent of the casino employees are ITKN tribal members. Another six to seven percent of the casino employees are spouses of ITKN tribal members. The full-time employees are provided customary employment benefits.

Substantially all of the casino’s supplies and equipment are provided by off-reservation vendors. The casino’s patrons tend to come from Brown, Doniphan and Richardson Counties. There are three competing gaming facilities less than a fifty-mile drive from Casino White Cloud near St. Joseph, Missouri, Powhattan, Kansas and Horton, Kansas. There are several other casinos within a 100-mile drive near Topeka, Kansas and metropolitan Kansas City. Casino White Cloud competes in a maturing market and profitability margins have declined in recent years.

Casino White Cloud’s primary North American Industry Classification System

⁵⁰ The casino food and beverage operations are not highly profitable. While not specifically operated as a “loss leader” for gaming revenues, the food and beverage operations are viewed by management as an amenity for the gaming customers rather than as a true profit center

⁵¹ Occupancy rates tend to be 100% during significant tribal events, such as pow wow weekend and the rodeo, as well as during the semi-annual flea markets sponsored by the City of White Cloud. Occupancy rates range from 40% to 50% the remainder of the year.

(“NAICS”) code is 713210 (stand-alone casino). Secondary NAICS codes are 722514 (buffet eating places) and 721110 (motel).

Operation of Casino White Cloud as a proprietary enterprise fund of the ITKN maximizes protections against claims due to the sovereign immunity of the ITKN. Based on this fact, the highly regulated nature of this business, and IGRA requirements that the ITKN maintain the “sole proprietary interest” in the gaming operation, David Tam, the consultant engaged to assist the ITKN Executive Committee in developing this Strategic Plan for Economic Development recommends that Casino White Cloud continue to be operated as a proprietary enterprise fund. However, Mr. Tam did recommend that consideration be given to establishing a three to five-member gaming board to oversee Casino White Cloud and its operation. Ideally, the gaming board would be composed of members with specific gaming or other business experience to guide operations and maximize profitability while freeing Executive Committee members to focus on governmental operations of the ITKN. The suggested gaming board would be accountable to the Executive Committee on behalf of the ITKN.

2.5.1.2 FARM OPERATIONS

The Ioway Farms, LLC is conducted as a Limited Liability Company owned by the ITKN and managed by Grey Snow Management Solutions. The farm operation has been a conventional ag operation and has operated at a profit. The ITKN is currently transitioning from a conventional ag operation to a regenerative ag operation. The farm activities are concentrated on rebuilding healthy soils which will enhance the black angus cow-calf operation, grass and grain finished black angus beef, small chicken layer operation, small bore meat goat operation, vegetable operation and producing industrial hemp, wheat, corn, and soybeans as cash crops. Millet, sorghum sudan, oats, and brome are baled for supplemental feed during the winter months. Most of the year livestock are grazing pastures and multispecies cover crops. There are four full-time employees on the farm operation, two of whom are ITKN tribal members.

Apart from forage crops grown in support of livestock operations, substantially all of the farm operation’s supplies and equipment are provided by off-reservation vendors. The products of the farm operation which are not retained as forage are sold in traditional commodities markets.

The primary NAICS code for the farm operation is 112111 (beef cattle ranching or farming). Secondary NAICS codes are 111150 (corn farming, except sweet corn) and 111110 (soybean farming).

The farm operation will be under a separate enterprise board composed of members with significant business experience. This possibly could take the form of a separate tribal business enterprise holding company wholly owned by the ITKN and accountable to the Executive Committee on behalf of the ITKN. Selection of the exact structure would be guided by legal and accounting advice regarding minimization of enterprise liabilities

and regulatory jurisdiction of outside governments, including minimization of adverse tax consequences. As with the recommended structural approach for Casino White Cloud, this structure would involve tasking the enterprise board with guiding operations and maximizing profitability while freeing Executive Committee members to focus on governmental operations of the ITKN.

2.5.1.3 GRANDVIEW OIL

Grandview Oil is operated as a proprietary enterprise fund of the ITKN. This operation has historically operated at a modest loss. This business operates a gas station and convenience store near Casino White Cloud. There is one full-time employee and two part-time employees. Of these, all are ITKN tribal members.

Substantially all of Grandview Oil's supplies and equipment are provided by off-reservation vendors. Its customer base appears to be composed primarily of reservation residents, Casino White Cloud patrons and employees, and ITKN employees.

The primary NAICS code for this business is 447110 (gasoline station with convenience store).

Moving forward, the ITKN will place oversight of Grandview Oil under a separate enterprise board as discussed above concerning the ITKN farm operations.

2.5.1.4 IOWA BEE FARM

Founded in 2017, the Iowa Bee Farm, owned and operated by the Iowa Tribe of Kansas and Nebraska, offers a variety of products such as raw honey, creamed honey, lotion bars, lip balms and beeswax candles. Our label features Chief White Cloud, Mahaska, painted in 1844 by the famous western painter George Catlin. Mahaska signed the 1836 treaty which established the Iowa Tribe of Kansas and Nebraska reservation along the Missouri River in Kansas and Nebraska. The river bluffs, woodlands, and meadows are full of native medicinal plants and wildflowers, that the Tribe's bees rely on to make nanyi (NAH-nyee), pure honey and other products.

2.5.1.5 OTHER TRIBAL BUSINESS ACTIVITIES

The ITKN's remaining proprietary revenue-generating activities are their water utility, trash collection, and rental properties. These activities, which have been historically aggregated for accounting purposes, have historically operated at a modest loss.⁵² The trash collection operation has two full-time employees who are an ITKN tribal member.⁵³ The water utility and rental property activities are staffed on an as-needed basis by employees from ITKN's various departments.

⁵² Net annual losses from combined operations averaged \$43,434 from 2011 through 2013.

⁵³ This employee's trash collection duties do not occupy his full work week, so his excess capacity is devoted to support of the ITKN maintenance department.

Substantially all of the supplies and equipment used in these activities are provided by off-reservation vendors. The water utility supplies ITKN operations and some, but not all, of the reservation households. The trash collection operation primarily serves ITKN operations and reservation residents. The rental properties are single-family dwellings owned by the ITKN and located on the reservation.

Net annual losses from operations averaged \$45,874 from 2011 through 2013. 12 Net annual losses from combined operations averaged \$43,434 from 2011 through 2013. 13 This employee's trash collection duties do not occupy his full work week, so his excess capacity is devoted to supporting the ITKN maintenance department.

The primary NAICS code for the water utility is 221310 (water supply and irrigation systems). The primary NAICS code for the trash collection service is 562111 (trash collection services). The primary NAICS code for the rental property activity is 531110 (single-family house rental or leasing).

Going forward, each of these activities will be separated and operated independently of one another. Concerning the water utility, the economic development consultant recommends continuing these operations under the direct control of the ITKN tribal administration as a proprietary enterprise fund. The primary purpose of these operations is not to generate revenue for the ITKN; rather, they are primarily devoted to supporting the infrastructure needs of the reservation and its residents.

In addition, the trash collection service and rental property activities will each be placed under the oversight of a separate enterprise board as discussed above concerning the ITKN farm operations and Grandview Oil.

2.5.2 TRIBAL AFFILIATES

Tribal affiliates work in conjunction with the Tribal corporations and other Tribal government programs to provide education, workforce training, and infrastructure to support the Tribal membership. These affiliates include Grey Snow Sanitation, the Iowa Tribe Housing Authority, Native American Family Services, Inc. and Education Programs (Section 2.4.8)

2.5.3 TRIBAL GOVERNMENT REVENUE-PRODUCING PROGRAMS

2.5.3.1 INDUSTRIAL HEMP PROGRAM

On Monday, January 27th the USDA announced the second round of approvals of State and Tribal plans for the regulation of industrial hemp production. Among those approved were the Iowa Tribe of Kansas and Nebraska, now one of seven Tribes in the United States granted the ability to individually regulate the production of industrial hemp on their reservation. The implementation of the industrial hemp program will now allow all farmers within the reservation to be able to directly apply with the Tribe's Department of

Agriculture for licensure. Applicants can choose between either one-year or three-year license terms starting February 15th, 2020.

2.5.3.2 TRIBAL HISTORIC PRESERVATION OFFICE (THPO)

The THPO is the historic preservation office for the tribe, which handles historical preservation compliance reviews, NAGPRA (Native American Graves Protection and Repatriation Act), and other cultural issues. The THPO provides a tour of some of the historic, cultural and natural highlights on the Iowa Reservation. The tour begins at Casino White Cloud and features the Baxoje Wosgaci (Iowa Museum and Culture Center), service station, Chief James Whitecloud House, Powwow Grounds, Leary Site National Historic Landmark, Oak Grove Schoolhouse, Happy Hollow, River Road, Dupuis Hollow, Cast Iron Monument trail, Glacial Byways, Hopewell archaeological site, Lewis and Clark Pavilion, the town of White Cloud, the Four State Lookout, Tesson Cemetery, and then the loop returns to the Casino.

2.5.3.4 THE FISH AND WILDLIFE DEPARTMENT

The Fish and Wildlife Department is charged with enforcing fish and wildlife laws, but the program's conservation wardens also coordinate search and rescue operations, collect fish and wildlife data, and assist the public when they encounter problems with wildlife.

2.6 EXISTING TRIBAL JOB TRAINING PROGRAMS

2.6.1 ADULT EDUCATION PROGRAM

The purpose of the Adult Education Program is to assist unemployed and/or underemployed tribal members by:

- Improving educational opportunities for tribal members who lack the level of literacy skills necessary for effective citizenship and productive employment,
- Provide tribal members with sufficient basic education to enable them to benefit from job training and retraining programs and to obtain and retain productive employment, and
- Enable tribal members, who so desire, to continue their education to at least the level of completion of adult secondary education (Diploma/GED).

2.6.2 LYNN ROUBIDOUX SCHOLARSHIP

The Lynn Roubidoux Scholarship is for graduating Seniors that are planning on attending accredited schools of the following types:

- Universities or colleges of higher education
- Vocational or Trade schools
- Technical Schools
- Nursing Schools

2.6.3 DEPARTMENT OF HUMAN RESOURCE DEVELOPMENT (DHRD)

The Tribal Department of Human Resource Development operates several programs that provide training and work experience.

2.7 RESOURCES THAT CAN PROVIDE SUPPORT TO TRIBAL MEMBER BUSINESS

2.7.1 ITKN ECONOMIC DEVELOPMENT OFFICE

ITKN's Economic Development Office (EDO) has managed a small business grant program, assisting nearly all Tribal member-owned businesses with capital for business start-up or expansion, equipment, supplies, insurance, rent and other operating costs.

The EDO provides a vehicle for individuals, organizations, local governments, institutes of learning, and private industry to engage in a meaningful conversation and debate about what capacity building efforts would best serve economic development in the region. The EDO will take into account and, where appropriate, integrate or leverage other regional planning efforts, including the use of other available federal funds, private sector resources, and state support which can advance a region's CEDS goals and objectives.

2.7.2 EDUCATION & SCHOLARSHIP PROGRAMS

The education programs are designed to provide students with essential business skills and the knowledge needed to start and operate a successful business, including the development of business and vocational skills and employability.

2.8 ECONOMIC TRENDS, RELATIONSHIP TO THE OUTSIDE ECONOMY, AND OTHER ECONOMIC PERFORMANCE FACTORS

2.8.1 EMERGING OR DECLINING INDUSTRY SECTORS⁵⁴

The Iowa Reservation has a few mixes of industries. Exiting the recent downturn in the economy, the Reservation is seeing strong growth in a variety of industries such as Agriculture and Education. According to the 2014-2018 American Community Survey 5-Year Estimates, 139 people (16 years and above) were employed on the reservation with the Arts, Entertainment, Recreation and Foodservice industry as the largest with the Education, Health and Social Care services following behind. The total number of people employed as recorded to be 96 (see section 2.2.2.5).

The recorded number of jobs available in Brown County, KS, was 7,085 in 2018, while that

⁵⁴ Emerging or declining industries for the year 2018 on the Iowa reservation and surrounding counties

of Doniphan County was recorded to be 3694.

The most common job groups, by number of people living in Brown County, KS, in 2018 are Management Occupations (611 people), Office & Administrative Support Occupations (492 people), and Production Occupations (478 people). The least common jobs held by residents of, by the number of employees, are Life, Physical & Social Science (26 people), Computer & Mathematics Occupations (46 people), and Architecture & Engineering (47 people). The highest paid jobs held by residents of the County, by annual earnings, are Health Diagnosing & Treating Practitioners & Other Technical Occupations (\$72,250), Computer & Mathematical Occupations (\$92,639), and Architecture & Engineering Occupations (\$58,977).⁵⁵

The most common job groups, by the number of people living in Doniphan County, KS, are Office & Administrative Support Occupations (553 people), Management Occupations (442 people), and Production Occupations (325 people). The least common jobs held by residents of the County, by the number of employees, are Life, Physical & Social Science (9 people), Legal Occupations (15 people), and Architecture & Engineering (26 people). The highest paid jobs held by residents, by annual earnings, are Fire Fighting & Prevention (\$105,795), Computer & Mathematical Occupations (\$91,550), and Architecture & Engineering Occupations (\$58,538).⁵⁶

The most common job groups, by the number of people living in Richardson County, NE, are Management Occupations (656 people), Office & Administrative Support Occupations (333 people), and Production Occupations (379 people.) The least common jobs held by residents of the County, by the number of employees, are Arts, Design, Entertainment, Sports & Media (9 people), Legal Occupations (7 people), and Life, Physical & Social Science (23 people). The highest paid jobs held by residents, by annual earnings, are Health Diagnosing & Treating Professionals (\$56,250), Legal Occupations (\$79,375), and Architecture & Engineering Occupations (\$62,500).⁵⁷

This chart below illustrates the share breakdown of the primary jobs held by residents of Brown, Doniphan and Richardson County. This table also lists the average annual wage for those occupations.

Occupation	Brown County	Doniphan County	Richardson County
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⁵⁵ 2019 American Community Survey

⁵⁶ 2019 American Community Survey

⁵⁷ 2019 American Community Survey

	Estimate	Average Wage \$ (Year)	Estimate	Average Wage \$ (Year)	Estimate	Average Wage \$ (Year)
Management	661	44,688	442	49,609	656	44,028
Office & Administrative Support	492	28,958	553	31,961	333	31,389
Production	478	36,713	325	53,750	379	45,298
Sales & Related	389	41,818	218	32,917	252	40,804
Construction & Extraction	237	37,137	226	41,813	325	42,298
Education, Training & Library	235	36,667	241	39,595	192	44,038
Healthcare Support	214	27,500	148	30,469	200	25,000
Building, Grounds Cleaning & Maintenance	198	32,917	181	26,667	184	35,563
Material Moving	195	28,405	240	41,667	84	50,500
Transportation	195	31,392	165	39,886	213	46,917
Health Diagnosing & Treating practitioners	183	72,250	124	46,429	237	56,250
Personal Care & Service	159	12,917	103	20,625	54	23,036
Food Preparation & Serving Related	138	24,375	178	18,229	145	6,979
Fire Fighting, Prevention & Other Protective Service	120	32,188	64	105,795	97	54,583
Community & Social Service	114	33,125	32	39,286	57	37,431
Installation, Maintenance & Repair	108	49,063	126	39,375	224	42,917
Health Technologists	73	44,583	48	31,250	80	40,486
Farming, Fishing & Forestry	64	32,778	61	21,000	52	37,857
Business & Financial Operations	58	51,250	92	40,750	58	37,125
Law Enforcement Workers and Supervisors	58	46,875	32	44,250	32	48,409
Arts, Design, Entertainment, Sports & Media	53	31,071	32	44,063	9	0
Architecture &	47	58,977	26	56,538	63	62,500
	46	92,639	31	91,500	54	0

Engineering	26	49,000	9	46,250	23	0
Computer & Mathematical			15	39,583	7	79,379
Life, Physician & Social Science						
Legal						

Table 24 Source: 2019 American Community Survey

ANNUAL TRENDS IN PRIVATE EMPLOYMENT BY ECONOMIC SECTORS: BROWN COUNTY KANSAS⁵⁸

There were 1031 private-sector jobs across various sectors in Brown County, KS in 2017. The number of jobs in the County in 2017 is slightly less than the amount in 2011, at 2579 jobs, when the Great Recession was beginning the following are the top five industries in terms of employment: Local Health Services (242 or 23.5%), Local Hospitality Establishment (216 or 21%), Financial Services (184 or 17.8%), Motor Vehicle Products and Services (95 or 9.2%), and Food and Beverage Processing and Distribution (72 or 6.9%). Majority of the sectors experienced growth between 2011 to 2016 but gradually began to decline from the year 2017.

	2011	2012	2013	2014	2015	2016	2017	2017	2011-2017 CAGR
Total Private Employment	2579	2477	2656	2535	2610	2663	1031	100%	-14%
Health Sector	890	933	868	855	882	825	242	23.5%	-19.5%
Hospitality Establishment	243	20	262	239	251	282	216	21%	-1.9%
Financial Services	191	170	187	165	170	202	184	17.8%	-0.6%
Motor Vehicle Product and Services	125	140	140	188	190	208	95	9.2%	-4.5%
Food, Beverage Processing & Distribution	30	110	100	87	88	89	72	6.9%	15.7%
Utilities	140	130	140	90	90	90	60	5.8%	-13.1%
Communities & Civic Organizations	85	104	88	94	140	149	59	5.7%	-5.9%

⁵⁸ Table does not record government employment, military and certain private sectors such as mining and agriculture.

Logistics Services	100	100	100	100	79	82	41	3.9%	-13.8%
Education & Training	120	70	70	70	70	70	10	0.97%	-33.9%
Industrial Products & Services	70	70	70	70	70	70	-	-	-
Retail	195	205	205	195	195	205	-	-	-
Entertainment & Media	40	40	40	40	40	40	-	-	-
Personal Services(non-medical)	80	80	80	80	90	90	-	-	-
Household Goods & Services	59	44	50	40	50	50	-	-	-
Real Estate, Construction & Development	180	220	215	182	164	171	35	3.4%	-23.9%
Commercial Services	40	41	41	40	41	40	17	1.6%	-13.3%

Table 25 Source: US Cluster Mapping Project, Institute for Strategy and Competitiveness, Harvard Business School. Note CAGR = compound annual growth rates.

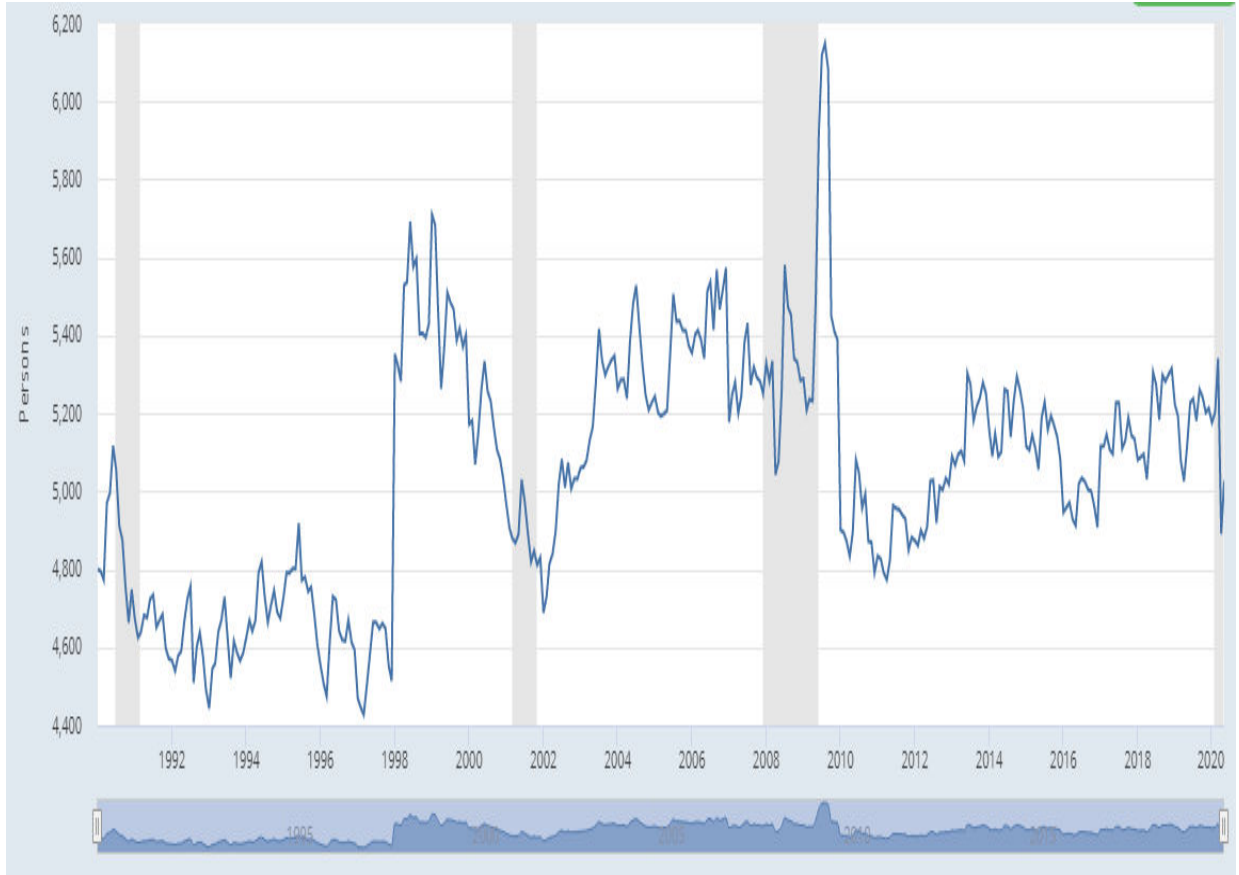


Fig 16 Employed persons in Brown County KS. Source: US Cluster Mapping, US Bureau of Labor Statistics. Shading indicates US recessions. The most recent one is ongoing

COMPARING EMPLOYMENT TRENDS: BROWN COUNTY KANSAS VERSUS RICHARDSON COUNTY

	BROWN COUNTY				RICHARDSON COUNTY			
	2011	2017	DISTRIBUTION	2011-2017 CAGR	2011	2017	DISTRIBUTION	2011-2017 CAGR
Total Private Employment	2579	1031	100%	-14%	1885	500	100%	-19.8%
Health Sector	890	242	23.5%	-19.5%	435	20	4%	-40.1%
Hospitality Establishment	243	216	21%	-1.9%	187	153	30.6%	-2.9%
Financial Services	191	184	17.8%	-0.6%	67	63	12.6%	-1%
Motor Vehicle Product and Services	125	95	9.2%	-4.5%	190	55	11%	-18.7%
Food, Beverage Processing & Distribution	30	72	6.9%	15.7%	125	-	-	-
Utilities	140	60	5.8%	-13.1%	20	-	-	-

Communities & Civic Organizations	85	59	5.7%	-5.9%	167	45	9%	-19.6%
Logistics Services	100	41	3.9%	-13.8%	100	15	3%	-27.1%
Education & Training	120	10	0.97%	-33.9%	70	-	-	-
Industrial Products & Services	70	-	-	-	20	-	-	-
Retail	195	-	-	-	20	-	-	-
Entertainment & Media	40	-	-	-	10	8	1.6%	-3.6%
Personal Services(non-medical)	80	-	-	-	30	5	1%	-25.8%
Household Goods & Services	59	-	-	-	110	15	3%	-28.3%
Real Estate, Construction & Development	180	35	3.4%	-23.9%	242	74	14.8%	-18%
Commercial Services	40	17	1.6%	-13.3%	92	47	9.4%	-10.6%

Table 26 Source: US Cluster Mapping Project, Institute for Strategy and Competitiveness, Harvard Business School. Note CAGR = compound annual growth rates.

While total private employment in Brown County dropped by percent -14% annually from 2011 to 2017, total private employment in Richardson County, NE also declined at an annual pace of -19.8 percent.

In Brown County, the healthcare sector was the major employment sector and was responsible for 23.5 percent of employment while the Hospitality sector was responsible for 30.6% of employment in Doniphan County. Both counties have experienced a fast drop in their CAGR which can be attributed to the recession in the US.

2.8.2 RELATIONSHIP TO LARGER REGIONAL AND GLOBAL ECONOMIES—ADVANTAGES AND DISADVANTAGES

The Iowa Reservation is located in the center of Kansas and Nebraska’s growing economy. The Reservation is bordered on the southeast by Richardson County of Nebraska, and on the northeast by Brown and Doniphan County of Kansas. The Reservation is located on the Tesson Ferry Road. This pleasant winding country lane is a working road full of farming activity, including machinery, cattle and corn, with wooded areas, fields, and creeks. Recreationists and new residents come to the Reservation from the neighboring cities and beyond because the Reservation is blessed with spectacular natural resources including its proximity to the Missouri and Nemaha River which is a major tourist attraction.

However, overuse of some areas and uncontrolled growth in others is affecting Tribal member cultural practices, including fish, plant and wildlife conservation. ITKN conducts

scientific studies related to; stream fish diversity and abundance, fish community diversity and abundance in tributary reach connecting to the Missouri River and aquatic habitat conditions. They also provide observations about reservation land-use and remaining natural habitats.

A loop tour of some of the historic, cultural and natural highlights is available on the Iowa Reservation. The tour begins at Casino White Cloud and features the Baxoje Wosgaci (Ioway Museum and Culture Center), service station, Chief James Whitecloud House, Powwow Grounds, Leary Site National Historic Landmark, Oak Grove Schoolhouse, Happy Hollow, River Road, Dupuis Hollow, Cast Iron Monument trail, Glacial Byways, Hopewell archaeological site, Lewis and Clark Pavilion, the town of White Cloud, the Four State Lookout, Tesson Cemetery, and then the loop returns to the Casino.

2.8.3 OTHER FACTORS AFFECTING THE ECONOMIC PERFORMANCE OF THE RESERVATION

2.8.3.1 WORKFORCE ISSUES

According to the 2014-2018 American Community Survey 5-Year Estimates, nearly 1 out of every 5 Tribal members who are employed, work for the ITKN. More than 50% work for a private or non-profit company and less than 7% are self-employed.

Also, according to the survey, the number of unemployed tribal members living on the Reservation, ages 16 and over, is 5. This low number is attributed to the lack of infrastructure on the reservation which in turn, fails to provide jobs to tribal members both living on and off the reservation.

While the Tribal government and its corporations have made great strides toward providing infrastructure, there remains a gap in employment for many. The poverty rate for American Indian families in Brown, Doniphan and Richardson County (the counties surrounding the Reservation) continues to be triple that of white families. ITKN's Department of Human Resource Development manages income assistance and workforce development programs and provides services to 60 percent of the tribal members residing on the IOWA Reservation with Workforce Investment Act (WIA), Child Care, Family Services, Burial Assistance, Low Income Energy Assistance Program (LIHEAP) and Workforce Innovation and Opportunity Program--another indicator of the unemployment/under-employment rate of the Tribal population.

2.8.3.2 INFRASTRUCTURE

Investment in infrastructure is a critical component of economic development that enhances the daily functioning of our community and provides the necessary ingredients for growth and prosperity.

Water resources on the Iowa Reservation are limited. The lack of centralized water and sewer on the reservation continues to be a limiting factor for growth and industrial

development. The lack of consolidation of water and sewer providers across the region also presents several challenges for both urban and rural areas, most important of which is the limited ability to make capital intensive investments in infrastructure improvements and system expansions. The ITKN water utility continues to explore an expansion of its network to cover the entire reservation with financial assistance from federal agencies.

The reservation suffers from numerous power outages throughout the year, affecting homes and local businesses. These outages can have a detrimental effect on tribal and non-tribal members', who live within the reservation boundaries, health and safety. These brown and blackouts are caused by the reservation being at the end of the line for the local electrical company. Severe weather also contributes to these outages.

There are no financial institutions with facilities located on the reservation. Accordingly, all reservation residents and businesses must obtain all financial services from institutions located off-reservation.

2.8.3.3 INADEQUATE CULTURAL AND RECREATION FACILITIES

While the surrounding counties each have a bowling alley, movie theaters and other recreational centers, the Reservation does not have these amenities. The casino White Cloud, the Baxoje Wosgaci (Iowa Museum and Culture Center) have been built, but they need considerable maintenance. There are historic, cultural and natural highlights on the Iowa Reservation which are being used as tourist attractions. The Tribal does not operate a fitness center and there are no indoor recreational facilities for basketball or other activities.

2.8.3.4 ENVIRONMENTAL ISSUES AND LAND USE

To protect the Class II air shed, water quality, fisheries, wildlife, wetlands, floodplains, prime farmlands, scenic areas, and other culturally important resources of the Reservation, the Tribes adopted a policy of integrated resource management, where potential impacts on all land use and natural resources must be considered before developing one resource, and protection of cultural resources, air and water quality, and fish and wildlife is the priority.

The Fish and Wildlife Department is charged with enforcing fish and wildlife laws, but the program's conservation wardens also coordinate search and rescue operations, collect fish and wildlife data, and assist the public when they encounter problems with wildlife.

The ITKN is currently assisting New Century Environmental with a fisheries study. Scientific studies related to stream fish diversity and abundance, fish community diversity and abundance in tributary reaches connecting to the Missouri River and aquatic habitat conditions will be conducted. The tribe also provides observations about reservation land-use and remaining natural habitats.

2.8.3.5 CLIMATE CHANGE

Climate change impacts increase the vulnerability of at-risk communities in the Midwest; The ITKN are especially vulnerable because they rely on threatened natural resources for

their cultural, subsistence, and economic needs. Integrating climate adaptation into planning processes offers an opportunity to better manage climate risks now.

Climate stressors such as higher temperatures, increasing variation in precipitation patterns, and changes in lake levels are likely to increase the vulnerability of human systems in cities, rural and coastal communities, and tribes to extreme events—including flooding, drought, heatwaves, and more intense urban heat island effects. Climate stressors compound existing non-climate stressors, such as economic downturns, shrinking cities, and deteriorating infrastructure.

Risk-based approaches that assess vulnerabilities and include effective planning and implementation of adaptation options help communities mitigate and better respond to the impacts of a changing climate. These approaches rely on community participation to manage risk and to monitor and evaluate adaptation actions. However, documented implementation of climate change planning and action in the region remains low.

Attempts to assess vulnerabilities, especially for poor urban communities, face persisting environmental and social justice barriers—such as lack of participation and historical disenfranchisement—despite evidence that these communities are going to be disproportionately affected by climate impacts. A lack of political and financial support at the state and federal levels is another barrier to adaptation action in cities and counties.

Work on estimating the cost of adaptation nationally—and in the region—remains limited, even though the EPA has estimated that the region is among the regions with the largest expected damages to infrastructure. This includes the highest estimated damages to roads, rising from \$3.3 billion per year in 2050 to \$6 billion per year in 2090 (in 2015 dollars) under a higher emissions scenario, and the highest number of vulnerable bridges.

TRIBAL ADAPTATION

The ITKN has been among the first to feel the effects of climate change as it impacts their culture, sovereignty, health, economies, and ways of life.

In certain tribal cultures, all beings (species) are important; climate adaptation efforts that favor certain beings at the detriment of others can be problematic. Adaptation to climate change might also mean giving up on something deeply embedded in tribal culture for which no substitute exists. A family sugarbush (a forest stand used for maple syrup), for example, cannot be replaced culturally, spiritually, or economically if the sugar maple range were to shift outside of treaty or reservation boundaries.

The ITKN are developing adaptation plans that bring together climate data and projections with the Traditional Ecological Knowledge (TEK) of tribal members. Indigenous oral history often contains a knowledge of local ecosystems, not found in books, that can be used to

understand and document the changes that are occurring. Climate change effects are not typically immediate or dramatic because they occur over a relatively long period, yet tribal elders and harvesters have been noticing changes—such as declining numbers of waabooz (snowshoe hare)—that Scientific Ecological Knowledge may have been slower to document. The TEK of elders and harvesters can provide a valuable and nuanced understanding of ecological conditions on a smaller, more localized scale.

Integrating this TEK with Scientific Ecological Knowledge in climate change initiatives provides a more complete understanding of climate change impacts, and community input to tribal adaptation plans ensures that TEK can be used to produce adaptation strategies that are trusted by community members.

2.8.3.4 TRIBAL ECONOMIC DEVELOPMENT LAWS AND POLICIES

Tribal laws and policies that apply to economic development include but are not limited to the:

- Tribal Constitution
- Tribal Corporate Charter
- Gaming Ordinance 92D (Amended) -- regulates all forms of Gaming conducted within the boundaries of the Reservation bingo ordinance
- Limited Liability Ordinance 104A - provides the rules followed by CSKT for chartering limited liability companies under Tribal law; may be used to organize solely-owned and member-owned companies
- Resolution 14-R-20 Amended Gaming Ordinance
- Executive Council Policy to Strengthen the Owner/Operator Relationship with Tribally-owned Businesses (Corporations)
- 2015 Strategic Plan for Economic Development– Some of the objectives in this strategy have been completed, and others are ongoing and listed in this new CEDS. Upon adoption by the Executive Council, this 2020 Sustainable, Comprehensive Economic Development Strategy will replace the 2015 Strategic Plan.
- Indian Preference Ordinance – established “to counter the effects of discrimination against Indians and to promote Tribal and individual economic self-sufficiency ... so that preference is granted to qualified Indian employees and qualified Indian-owned entities within the boundaries of the Flathead Indian Reservation whenever permitted by Federal law.” This preference is also applicable for the award of contracts and subcontracts for the procurement of services, materials, supplies, and equipment required for work to be performed.
- Tribal Procurement and Indian Preference Policy Compliance – While Indian preference and procurement policies establish a process for using Tribal member-owned businesses in the procurement of goods and services, non-compliance with these policies by some departments is a concern.

3. ECONOMIC STRENGTHS, WEAKNESSES, OPPORTUNITIES AND THREATS (SWOT)

The Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis was conducted in several ways to receive the most feedback possible from the public and stakeholders. Questions relating to the SWOT were included in a public survey, and respondents were asked to identify advantages and disadvantages on the reservation. The SWOT analysis was also conducted through stakeholder interviews where participants were asked what the strengths and weaknesses of the reservation were, and during committee planning meetings, where the SWOT analysis was conducted several times to ensure the greatest amount of participation. Building from the survey responses and stakeholder opinions, the

Strategy Committee established the following SWOT analysis for the Iowa reservation:

3.1 STRENGTHS

- Casino White Cloud is a stable employer and revenue-generating enterprise
- Tribal agricultural operations
- Water rights, both groundwater-surface water rights
- Proximity to Missouri River and Grand Nemaha River
- Wind and solar resources
- Good hunting and fishing
- Infrastructure, including roads, landline telephone, electricity, and broadband
- Low crime rate
- Established tribal police and fire protection
- Potential tax advantages for tribal members living and working on the reservation
- Excess low-income housing
- Indian Health Service clinic on the reservation
- Local social services
- Basic adult education/job training and financial literacy programs

3.2 WEAKNESSES

- Water quality and wastewater management
- Water rights not quantified
- Water distribution systems do not cover entire reservation
- Lack of formal land acquisition/consolidation plan
- Lack of basic groceries and retail on the reservation
- Broadband not as fast as stakeholders would prefer
- No tribal school
- No local financial institution
- Insufficient transportation services, especially for seniors
- Insufficient housing, including dedicated senior housing, for those not meeting low-income housing requirements
- Limited access to healthcare beyond IHS clinic
- Lack of diverse employment opportunities on the reservation
- The underperformance of Grandview Oil
- Underutilization of cabin rentals
- Not utilizing federally chartered corporation for business purposes
- Executive Committee members are overextended due to the necessity of filling legislative, administrative, and business management roles
- No effective separation of tribal business enterprises from tribal governmental administration and politics
- No tribal administrator
- Lack of environmental protection department
- Insufficient community support for the community garden

- Lack of close EMS/Ambulance
- No full-time fire department
- Lack of tribal emergency services dispatch capability
- No detention facilities (have to contract with other local governments)
- Outdated fire and law enforcement mutual aid agreements with neighboring communities
- Little additional capacity in the locally trained workforce
- The perceived need for additional job training/adult education and financial literacy programming
- Tribal member scholarship recipients generally do not return to the reservation (although viewed as a positive investment in individual tribal members)
- Scholarship fund resources not sufficient to meet the need for tribal membership, especially in graduate programs
- Limited census information regarding reservation residents and tribal membership nationally
- Far-flung tribal membership

3.3 OPPORTUNITIES

- Possible additional self-determination contracts with the federal government, especially as a mechanism to expand the availability of reservation-based health care to community members (including non-tribal members)
- Establishment of a tribal business enterprise with Small Business Administration 8(a) certification and resulting federal contracting opportunities; related Indian preference contracting opportunities with other Indian tribes; related minority business enterprise (“MBE”) contracting opportunities with state and local governments and private sector businesses
- Expand agricultural operations, especially in terms of sustainability, value-added production, local foods initiatives, organic markets, new biofuels markets, and rural/agricultural tourism;
- Agricultural support operations (currently exploring tire sales and mobile service)
- Possibility of bringing Casino start-up car services in-house
- Explore internal generation of electricity for reservation via alternative energy sources
- Leverage current maintenance activities of Tribal Administration and Housing Authority into commercial service for third parties
- Develop tribal businesses for HVAC and electric (replace outside contractors for tribal operations; provide commercial service to third parties)
- Expand trash collection service area

currently exploring the development of a premium beef program to supply local and regional restaurants

- Develop a meat market with small grocery operation on the reservation as an outlet for premium beef product and local produce
- Potential for river recreational activities
- Potential for an additional outdoor event at rodeo grounds
- Car wash business at Grandview Oil
- Information Technology business to support ITKN and surrounding communities
- Residential property ownership and management, especially in border communities
- Increase efficient utilization of tribal website to communicate with tribal members and other stakeholders
- Guide service for hunting/fishing
- Recreational vehicle park
- Provide full-time education officer, including financial aid navigator services for tribal membership
- Strategic development of City of White Cloud to generate revenue and drive traffic to reservation businesses
- Laundromat
- Local broadcast station
- Sponsor sporting events, such as youth tournaments and biking/running events
- Creative approaches to building community and leverage talents of tribal membership, including that living off-reservation, such as facilitating tribal member networking and creating an ITKN chamber of commerce/business directory
- Explore acquisition and operation of off-reservation businesses, beginning with neighboring communities
- Develop tribally supported financial institution such as a credit union, possibly in conjunction with other local tribes
- Expand efforts to develop tribal museum with increased cultural programming, exhibits, a marketplace for tribal member's products, and coordination with area schools and community/traditional garden project
- Develop mentorship/internship programs for tribal scholarship recipients to work with tribal administration, social service programs and businesses
- Develop a business incubator program, including financing programs and space for start-ups
- Partner with regional agencies and educational institutions, especially in the areas of adult education, job training, apprentice programs, and entrepreneurship programs
- Explore senior housing and assisted living integrated with local foods, cultural programming, and local health care

3.4 THREATS

- Flooding issues and relationship with U.S. Army Corps of Engineers; includes impact on agriculture (most flat land suitable for agricultural activities is in a flood plain)
- Frequent electrical surges and outages
- Limited cell phone coverage on the reservation
- Reliance on propane and resulting exposure to price fluctuations
- Approximately two-thirds of the reservation land base owned by parties other than the ITKN or its members
- Jurisdictional issues with state and local governments, including taxation issues (especially gasoline and cigarette taxes), wildlife management, social services, road maintenance (especially access/egress roads and bridges surrounding reservation), placing land into trust (resulting in removal from property tax rolls)
- Irrigation practices of surrounding landowners and impact on ITKN water rights
- Uncertainty over the likelihood and the resulting impact of proposed diversion of Missouri River water and related Kansas reservoir and pipeline
- The continued decline of White Cloud flea market and resulting in reduced traffic at tribal businesses
- The decline of the City of White Cloud
- Wage disparity issues and low prevailing wage
- Competition with other tribes in the region for federal resources, including both established tribes and additional tribes seeking reservations in the State of Kansas

Strengths focused primarily on infrastructures such as low crime rate, infrastructure, and water rights. The prime location of the region was also a great strength, with proximity to

Missouri and Great Nemaha River. The Casino White Cloud which is a revenue-generating enterprise on the reservation was also recognized as strengths. Weaknesses included insufficient community support, lack of basic infrastructure, insufficient housing, and lack of employment opportunities. Many of the weaknesses were looked at as opportunities such as the possibility for river recreational activities, recruitment, as well as diversifying into more industries such as agribusiness. Improvements to educational programs were viewed as opportunities to improve the reservation. Threats included water issues and competition with other tribes in the region for federal resources. Additionally, the lack of incentives for modernization and automation were also threatening the resiliency of the region.

3.5 SWOT: SURROUNDING REGIONS

The ITKN’s three surrounding counties, Brown and Doniphan, KS and Richardson, NE were all contacted and have some form of SWOT analysis on file. However, of these only Doniphan County’s analysis was conducted on the county as a whole, while Brown County’s SWOT analysis was centered on the county seat of Hiawatha, and Richardson County’s analysis was conducted as part of the EDA-approved Southeast Nebraska Development District’s (SENDD) Comprehensive Economic Development Strategy (CEDS) document. These respective SWOT analyses are as follows:

DONIPHAN COUNTY (2018)

STRENGTHS	WEAKNESSES	THREATS	OPPORTUNITIES
<ul style="list-style-type: none"> ● Location - Close to major populations, Highway interchanges and airports ● Culture - Work ethic, Family Oriented, Community Oriented, Community Pride ● Education - HCC, Small Schools ● Natural resources - soil, natural gas, the riverfront, The 4-state lookout, 	<ul style="list-style-type: none"> ● In Culture - Low wage mentality, Attitude, Lack of County Unity, Lack of Entertainment/Things to do ● In Tools for economic development - High taxes, Land is tightly held, Lack of funds to maintain county roads, the land requirement of 2 acres to build a new home, lack of funds to keep small schools open, lack of tax base, Lack of Incentives for Business and Developers 	<ul style="list-style-type: none"> ● Location - KDOT Unwilling to help open 36 access, Farmland Monopoly, St. Joe Crime Rate, Lack of Law Enforcement on Highway ● Culture – Fear of Change, We’ve Always Done It that Way, Surrounding cities negative 	<ul style="list-style-type: none"> ● Natural Resources - Landscape, Beauty ● Location - The MINK corridor, Highway 36, Urban Sprawl ● Businesses - AG focused, Truck Stops, Restaurants, Hotels, Grocery ● Citizens - Children Who Pursue Professions and Go to College ● Tools - HCC (trade schools),

<p>Tall Oak, Natural Beauty</p> <ul style="list-style-type: none"> History - The courthouse, Native American Culture, Lewis and Clark Trail, Pony express route; assets in this category throughout the county Tools Available - Zoning, Rural Opportunity Zones, High Land Valuation 	<ul style="list-style-type: none"> Location - Lack of Highway 36 access, No Railroads, Money Flow to KC and St. Joe Citizens - High Age, Lack Skills, Lack of Human Capital Business Climate - Not enough businesses, Hard for them to Open and Grow, Lack of entrepreneurs, Lack of Investors 	<p>attitudes about the County (St Joe, Hiawatha, Atchison), Gossip</p> <ul style="list-style-type: none"> Natural Resources – Pollution Outside Mandates 	<p>Branding, ROZ designation</p> <ul style="list-style-type: none"> Housing - Demand for housing in Highland
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BROWN COUNTY (2011)⁵⁹

STRENGTHS	WEAKNESSES	THREATS	OPPORTUNITIES
<ul style="list-style-type: none"> Great School facilities and school staff. Education (secondary and post-secondary scholarships). Post-secondary education in Highland, Atchinson, and St. Joseph Highland Community College – exists and is currently expanding. Access to Benedictine College – both of which offer various types of educational and training options Good hospital and healthcare system - Healthcare 	<ul style="list-style-type: none"> Lack of affordable and quality housing. Limited family housing units – rentals. Need housing for above low-income seniors. Quality of rental houses is not good. Lots of rundown homes, no proper upkeep of property in certain areas of town. Increase in home foreclosures. Lack of rental homes and apartments. Enough homes not available for sale Lack of housing updates Lack of pride in personal property Street conditions not good 	<ul style="list-style-type: none"> Non-renewal of tax credit programs Continued hidden expenses to business community such as freight add-ons and hidden inflation Product shortage in rural areas Government regulations – over restrictions of EPA - farm dust regulation; 	<ul style="list-style-type: none"> Availability of donated/swap land for expansions Neighboring communities industrial parks are landlocked Presence of active railroad for recruiting businesses Opportunity for more community events Smaller class sizes in school – opportunities to attract families to Hiawatha Opportunities for older adults Large labor

⁵⁹ <http://www.ksu-olg.info/assets/docs/Envisioning/Hiawatha/SWOT%20Summary%20Nov%202010%202011.pdf>

<p>services provide a high degree of assurance to residents for taking care of their health needs</p> <ul style="list-style-type: none"> • Good public library offers residents access to books, magazines, and other reading materials and various other types of services that impact quality of life • More parks compared to peer communities – offers residents high amenity value • Local newspaper and radio station, KNZA • Close to Kansas City International Airport-is a big advantage for personal and business-related travel • Highway 36 and 73. Close proximity to Interstate Highway 29 and 70. The highway runs both ways. Offers various types of advantage to residents and businesses. Highway 36 and 73 contribute toward attracting travelers into town • Community access to St. Joseph and 	<ul style="list-style-type: none"> • Water demand is almost at full capacity. Water quality is an issue (traces of nitrate) • Sidewalks (for walking, strollers and wheelchairs) not available • Lack of Walking/Biking trails • Limited low-skilled job opportunities. Lack of unskilled labor force. Too many people on welfare, high welfare rate • Lack of qualified people in technical areas • Uncertainty of job market, not many high paying jobs • Lack of local skilled workforce to expand manufacturing, healthcare and other industries • Lack of summer employment for high school children • Wages are low for employees • Limited access to venture capital • Limited recreation and entertainment options. Need to expand recreation programs for all age groups. Lack of recreation for young adults, limited family recreation, lack of recreation opportunities for kids and elderly • Need for a good senior center • Limited retail businesses. Lack of 	<p>water way, surface water run-off; HAZMAT regulations</p> <ul style="list-style-type: none"> • Infrastructure decline – due to increased traffic from traffic redirection. Deterioration of Highway 73 by truck flood traffic • If businesses would like a Rail Park – can they be serviced by coal trains? • Rural internet- lack of federal programs • Changing federal regulations for municipal utilities • Ag-based terrorism • Increase in rural poverty and shrinking middle-class • Casinos (our local ones, state-wide) • Expansion of retail in larger cities (within 30-60 minute driving 	<p>force in Tri-State area (KS-MO-NE)</p> <ul style="list-style-type: none"> • Opportunities for existing businesses to expand – survey businesses and assess potential for various types of training for various levels of staff. • Bedroom community – potential for becoming a bedroom community for folks working in St. Joseph and Topeka • Potential for people working from Hiawatha via the Internet. • 35-64 age group is growing and is projected to grow further • Potential for wildlife tourism (Turkey and deer hunting) • Potential for lake-based tourism • Potential to plant more Maple trees • Opportunity for a farmers market (a covered building) • With the high price of gas,
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<p>Topeka and Omaha, NE – offers residents the luxury of access to big city retail and service businesses</p> <ul style="list-style-type: none"> • Strategic location with many big cities within 45-120 minute driving distance – a selling point to attract more families • Railroad access-is an advantage for local businesses who rely on freight transportation • Low crime rate offers a safe environment for families and businesses • Davis memorial-attracts visitors • Fisher Center aquatic park-attracts locals and out-of-town visitors • Agriculture and available land. Strong agricultural economy. Agricultural businesses are an asset for the community • Agritourism (pumpkin patch, etc.) – is a major attraction for local and nearby communities. Is a growing industry nationally and 	<p>enough retail shopping. Lack of antique stores. Missing some types of retail businesses.</p> <ul style="list-style-type: none"> • Lack of residents loyalty to local stores • Hours of operation of retail businesses does not suit many customers. Inconvenient store hours over weekends • Lodging – appearance and management leave lot to be desired • Public transportation services are limited • No shuttle to KCI airport • Lack of 3G and 4G services from telecom providers. Need better services from telecom companies • High number of low income families. High incidence of poverty • Lack of a good variety of eating places. Lack of fresh food and salad bars. Need more variety in eating places - restaurants offering healthy food. Some downtown buildings need paint jobs • Lack of welcoming committee for newcomers. Need to welcome new residents and provide a list of what goes on in town. • Downtown beautification still leaves much to be 	<p>distance)</p> <ul style="list-style-type: none"> • Aging workforce. No job openings for younger people. • Lack of federal funding and farm subsidy cuts • Lack of some of the technology available to larger towns • Increasing poverty – increasing government dependence • Declining population • Post office closings • Federal funding cuts in a variety of areas • Expanding division between upper and lower class • General economy slowing down • Lack of direction on economic development • High infrastructure costs of broadband • Surrounding 	<p>people are making shorter trips for recreational purposes. Opportunity to make Hiawatha a destination site for a variety of recreational opportunities.</p> <ul style="list-style-type: none"> • Opportunities for youth growth potential through Church involvement • General intent to “do good” opens up various possibilities for the community • Potential for Agri-tourism – hunting, fishing in Missouri river • Promote local manufacturing – Schuetz, Wilde, Crosswinds • Airports in Kansas City and Falls City – opportunities for residents and businesses • Take advantage of existing daycare facility • Take advantage of Wal-Mart traffic • High tech jobs in agriculture. New opportunities in bio-agriculture
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<p>has potential for growth.</p> <ul style="list-style-type: none"> • Have adequate skilled labor force • Attractive downtown area. Updated downtown – New sidewalks, lights, planters in downtown focal point for residents • Brown County Developmental Services – for disabled adults 2 • Availability of a variety of elderly services-offer good quality of life for the elderly • NEK CAP revitalization and child education programs • Presence of Rainbow Telecommunications • Presence of Wal-Mart brings in a lot of traffic into town. Trade pull of Wal-Mart • Variety of industry in the area. Good mix of manufacturing facilities • Large farm equipment dealers in Hiawatha • Large trucking companies located within 20 miles • Presence of John Deere, Hemisphere and Farm Credit in Hiawatha – attracts 	<p>desired. Empty downtown buildings</p> <ul style="list-style-type: none"> • No access to continuing education for residents • A culture exists that it's „someone’s“ fault and general thought of handouts • Lack of decent airport. Lack of paved airport • Lack of civic organization’s effective leadership • Lack of collaboration within business and community members • Perception that jobs and lifestyles are not available (therefore folks move to the cities) • Lack of availability of tech services • Movie theater and bowling alley need updating • Nursing home and beds – not enough and sometimes patients go to other cities • Lighting along first street • Lack of good quality road infrastructure • Curb friendly appearance not good – main street intersection on 1st and Oregon St. • Lack of effective communication medium to publicize community events • Presence of railroad crossings • Limited rail services • Too far from large metropolitan areas 	<p>communities retail potential</p> <ul style="list-style-type: none"> • Change in agriculture programs • Overall government policies and tax codes • Lots of welfare – leads to increased drug use • Rural internet reach – barrier to good internet connectivity and information • Limited job opportunities in rural communities • Railroad • Wal-Mart hampering the growth of mom and pop stores • Reduced federal funding for school education • Lack of – health funding • Technology replacing manpower – reduced job opportunities • Resistance to 	<ul style="list-style-type: none"> • Leverage the agricultural revenue into venture capital • Promote the rural way of life to attract more residents • Leverage the traffic coming to town. • Neighborhood revitalization – opportunities • National exhibits – tourism potential • 4-wheeler “Park”- tourism potential • Expand utilization and Tech programs for employment in community – such as truck mechanic, electricians, plumbers • Opportunity to recruit a business related to Bio-research facility in Manhattan • Potential for creating new jobs with new innovative business in the community – for example, a healthy food store. • Increased expansion and
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<p>out-of-town customers</p> <ul style="list-style-type: none"> • Expanding Tech related businesses in Hiawatha • Good variety of retail businesses – attracts local and out-of-town customers • Unique businesses – photography. Businesses that bring in external revenue • Presence of large trucking company • Full service banking including mortgage • 24-hour services (e.g. auto services) • Community leadership. Local Government leaders forward thinking. Progressive approach to recruiting businesses and industry. Progressive City Council • Many area offices use Hiawatha for location – 4H Extension, Mental Health, Public Health etc. • Sense of strong, small, close built „family“ within the community. Strong values within the community. People want to work together to make the community better. Positive and 	<ul style="list-style-type: none"> • Closeness to cities (retail dollars are lost) • Increase availability of daycare (daycare not adequate) • Lack of high paying jobs that could bring more people to community • Sales tax rate is high 	<p>change, clinging to traditional – hindrance for growth</p> <ul style="list-style-type: none"> • Reduced state funding for education • Rural disadvantage in politics. Minority unfunded mandates. • Declining tax base • Drug culture • Middle income job loss throughout 	<p>support of HFED with new director and committee structure</p> <ul style="list-style-type: none"> • Continued activities by Historical Society, National Exhibits – attract residents and tourists • Opportunity for a new motel in Hiawatha • Take advantage of Highway 36 and 73 • Community Healthcare services – selling point for future residents • Railroad – attract new businesses • Opportunities for tribes to come together. • Alternate energy potential in community (wind farms) • Explore opportunities in technology based businesses • Tap the potential of telecommuting • Casinos – attract more tourists (revenue) to community
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<p>enthusiastic volunteers</p> <ul style="list-style-type: none"> • Presence of Glacial Hills Resource Conservation & Development Region, Inc. • Wealth financing available in community • Proximity to Missouri river • Local wages – affordable for employers • Room to grow within community • Improvements to city infrastructure • Daycare availability in community – labor force stays productive, kids grow and learn in a safe environment • Varied Churches • Good demographic mix • Lots of civic organizations-increases social capital within community 			<ul style="list-style-type: none"> • Use the available land for hunting – positive economic impacts • Agriculture provides opportunity for the future • Take advantage of residents that care for communities future • Strong will to survive · KNZA – radio programming reaching out to wider audience • Post-secondary training program in area • Grain production is excellent in the area • Rainbow high speed connection • Wolfe river GreenHouse • Potential for spin-off businesses from existing manufacturing
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RICHARDSON COUNTY (2012)⁶⁰

STRENGTHS	WEAKNESSES	THREATS	OPPORTUNITIES
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⁶⁰ http://www.statsamerica.org/ceds/pdfs/Denver/2012_06_4_1_247.pdf

<ul style="list-style-type: none"> • Strong and Well Positioned Regional Economy (I-80 & I-70) • Strong Agricultural Economy • Relatively Strong Community Civic Capacity • Well Educated Workforce • Strong Workforce Development System 	<ul style="list-style-type: none"> • Size & Lack of Scale • Fracturing of Development Efforts • Lack of Development Investment & Staffing • Industrial Attraction vs. Entrepreneur Development Focus • Limited Number of Growth Entrepreneurs 	<ul style="list-style-type: none"> • Demographics – Depopulation – Aging Population • Weaker Commodity Prices & Agricultural Real Estate Crash • Rising Real Fuel Prices • Recession in Lincoln and/or Omaha – National Recession • Government Funding Crisis 	<ul style="list-style-type: none"> • Rebounding & Resourcing Manufacturing • Likely Continued Strength in Production Agriculture • Opportunities for Regional Development Initiatives • Regional Prosperity Trust Fund • Capitalization on Retiree Economy
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4. STRATEGIC DIRECTION, ACTION PLAN & EVALUATION

This section is divided into three subsections:

- Strategic Direction – which includes the Vision and Goals that ITKN has for economic development on the Reservation.
- Action Plan – the specific, measurable, action-oriented, realistic and time-bound (SMART) objectives and steps ITKN and its partners plan to take to accomplish these goals, including reasonable cost estimates and potential funding sources, and objectives that address economic resilience.
- Evaluation – the measures of success that determine whether the goals and objectives have been met.

4.1 STRATEGIC DIRECTION

Over a decade ago, the Iowa Tribe of Kansas and Nebraska adopted Vision and Mission statements. While these are long-range statements that apply to more than economic development, they provide a comprehensive direction that must guide ITKN's economic

action steps.

4.1.1 TRIBAL VISION

The traditional values that served our people in the past are embedded in the many ways we serve and invest in our people and communities, in the way we have regained and restored our homelands and natural resources, in the ways we have built a self-sufficient society and economy, in the ways, we govern our Reservation and represent ourselves to the rest of the world and in the ways, we continue to preserve our right to determine our destiny.

4.1.2 TRIBAL MISSION

The Iowa Tribe of Kansas and Nebraska has adopted the following mission statement for the Tribe:

“Now and for the future, the Iowa Tribe of Kansas and Nebraska will protect and enhance its sovereignty, secure and exercise the powers of self-governance and self-determination, restore, preserve and steward the traditions, customs, language, lands and ancestral rights of its people, and promote the economic and social welfare of all tribal members with a primary focus on those residing in its service area.”

4.1.3 VALUES

The following Tribal values of the ITKN People are incorporated into all efforts for Tribal resource management and economic development:

- Commitment
- Honesty
- Trust
- Vision
- Cooperation
- Courage
- Respect
- Spirituality

Other values that are important to the partners who worked on this strategic plan include:

- Equality
- Loyalty
- Generosity
- Family
- Freedom
- Creativity

4.1.4 STRATEGIC PRIORITIES

Based on the evaluation of the descriptive profile and the various strengths, weaknesses, opportunities and threats identified by the stakeholders, the Executive Committee has identified several strategic priorities for economic development.

4.1.4.1 Establish Separate Tribal Business Enterprise

The ITKN will take steps towards establishing a separate entity wholly owned by the ITKN which will serve as a holding company for businesses operated by the ITKN (other than Casino White Cloud). This entity will have a governing board of directors composed of experienced business professionals which are named by the Executive Committee. To the extent possible, board members will be ITKN tribal members. This board will report and be accountable to the Executive Committee on behalf of the ITKN. While this board will have responsibility for oversight of the management of most tribal business operations, certain major decisions (such as significant transactions, real estate transactions, the incurrence of debt, discontinuing existing business operations, and establishing new subsidiary business enterprises) will be subject to approval by the Executive Committee. The exact structure of the new entity will be guided by legal and accounting advice regarding limitation of liability, accounting issues, and minimization of adverse tax consequences. The existing Section 17 corporation may be an appropriate vehicle.

The new entity will be responsible for evaluating and improving profitability of the ITKN agricultural, trash collection, rental property, and gas station/convenience store operations. Concerning agricultural operations, the new entity will explore opportunities for sustainability, value-added production, local foods initiatives, organic markets, new biofuels markets, and rural/agricultural tourism. For the rental properties, it will explore outsourcing property management functions to the Iowa Tribal Housing Authority on a contract basis. The new entity will also be responsible for exploring and implementing new business opportunities. It is anticipated that these new businesses will include:

- a profitable business enterprise which takes advantage of SBA 8(a) and MBE contracting opportunities;
- off-reservation retail and service businesses;
- on-reservation retail to support reservation residents and visitors;
- businesses designed to replace and compete with current vendors to the ITKN government and businesses; and
- businesses designed to establish the reservation and nearby communities such as the City of White Cloud as a day-trip destination for the St. Joseph, Kansas City, Omaha, Topeka, and Lawrence metropolitan areas.

This approach will enhance focused oversight of the ITKN business operations with a timely response to changing competitive conditions. Executive Committee members will be freed to focus on more traditional governmental tasks, including attention to tribal administration, infrastructure, social services, and managing relations with external

governments and agencies. Failure to implement this priority will result in continued overextension of the ITKN Executive Committee members, to the detriment of all tribal programs and businesses.

4.1.4.2 Address Tax Issues

With the assistance of legal counsel and input from the Finance Department and tribal business managers, the Executive Committee will review the current ITKN tax ordinances, their impact on current sales by tribal businesses, their impact on potential tribal, and private businesses on the reservation, and make any adjustments it deems advisable. The Executive Committee will also study current developments in state and local tax policy and legislation which may impact tribal businesses and their customers. The Executive Committee will determine whether entering into a tax compact with the State of Kansas and/or the State of Nebraska is necessary or desirable. If so, the Executive Committee will pursue such a compact, possibly in coordination with other neighboring tribes.

This approach will ensure that reservation-based businesses are not placed at a competitive disadvantage due to tax consequences. Failure to implement this priority may result in the decline of existing sales, particularly sales of gasoline and tobacco products

4.1.4.3 Enhance Legal Framework for Business

The Executive Committee will research, draft and adopt new ordinances governing the use of information held by the ITKN. These ordinances will balance concerns of ITKN tribal members regarding freedom of information about their government with confidentiality of private information and sensitive proprietary information.

The Executive Committee will research, draft and adopt new ordinances governing business licensing and creation of corporations and limited liability companies under tribal law. The business licensing ordinance will establish ITKN regulatory authority over those conducting business on the reservation. The corporation and limited liability ordinances will permit those who wish to create a reservation-based business an alternative to chartering an entity under state law. It will also provide the tribal holding company discussed above with maximum flexibility to create subsidiary entities while avoiding state regulation.

4.1.4.4 Address Water Issues

The ITKN will establish a formal Water Department. Current water utility operations will be housed in this department. This department will be responsible for water quality issues and expanding reliable service, including fire hydrants, to all reservation structures. This department will support the Executive Committee in efforts to fully identify all water rights of the ITKN and determine whether seeking quantification of those rights is necessary or desirable. This department will also explore methods to protect ITKN water rights. Finally, this department will support the Executive Committee in monitoring policy issues related to the current proposed Missouri River pipeline project. At least initially, the Water Department will be cross-staffed with employees from other tribal departments and

businesses (such as billing staff, meter readers, and maintenance).

4.1.4.5 Tribal Business Directory

The tribal website administrator will create and maintain a directory of businesses owned by tribal members on the tribal website. All businesses owned by the ITKN will be listed as well as businesses submitted by verified ITKN tribal members. The directory will serve as a resource for tribal members, tribal businesses and others in procuring goods and services.

4.1.5 Tribal Economic Development Goals

The following economic development goals and objectives have been adopted for the proposed CEDS plan. See section 4.2 below for the action plan.

Year One (2021)

- Establish new tribal business enterprise holding company to operate and improve the profitability of the agricultural, trash collection, rental property, and gas station/convenience store businesses and to explore and pursue new business opportunities
- Analyze existing ITKN tax ordinances and, if necessary, make changes and pursue tax compacts with other taxing authorities having concurrent tax jurisdiction
- Adopt freedom of information and privacy ordinances governing information held by the ITKN and its entities
- Adopt a business licensing ordinance
- Adopt an ordinance permitting the creation of tribally-chartered corporations and limited liability companies
- Reorganize all ITKN activities about water on the reservation into a new Water Department
- Establish an online directory of businesses operated by the ITKN and ITKN tribal members
- Negotiate and implement new mutual aid agreements for fire protection and law enforcement with surrounding agencies

These are goals to be completed during Years Two through Five. (2022-2025)

- Establish targets for distribution of tribal business enterprise profits to fund ITKN governmental operations
- Expand water service, including fire hydrants, to all structures on the reservation
- Improve broadband speed and reliability
- Increase non-low-income residential real estate portfolio, including

off-reservation properties

- Expand health care offerings on reservation beyond the current IHS health station
- Hire a full-time tribal administrator
- Amend Constitution to provide for constitutional authority for judicial branch and separation of powers
- Implement a recurring census of reservation residents and all tribal members regardless of residence
- Establish an Education Department, with responsibility for the administration of all ITKN education, job training, internship, scholarship programs, and navigator services to tribal members concerning non-ITKN programs and financial aid
- Establish a tribal internship program tied to financial aid provided by the ITKN
- Establish an Environmental Protection Department
- Establish profitable federal contracting business taking advantage of tribal Indian preference programs, federal Section 8(a) contracting preference, and state, local and private section MBE contracting preferences
- Establish expanded agricultural activities
- Establish a meat market and local produce grocery as an outlet for ITKN agricultural activities
- Establish an RV park convenient to Casino White Cloud
- Tribal museum fully operational
- Establish a business incubator program for tribal members with office space for tart-ups
- Reduce the frequency and intensity of electrical surges and outages on the reservation
- Improve cell phone coverage throughout the reservation

Year Ten (2030)

These are goals to be accomplished during Years Six through Ten, or sooner if possible.

- Design and implement a formal land acquisition plan for the reservation and adjacent area
- Establish a tribal school
- Establish or recruit one or more financial institutions to provide branch financial services to reservation residents, businesses, employees and visitors, possibly as a cooperative effort with other tribes in the area
- Establish a senior residential community with an assisted living capacity
- Establish a full-time fire department with EMS/EMT and ambulance
- Establish tribal emergency services dispatch capability
- Establish tribally controlled electrical generation capabilities for ITKN facilities

and possibly the remainder of the reservation

- Anchor revitalization of City of White Cloud business district
- Develop a long-range investment plan

Year Twenty (2040)

- Develop a sustainable economy for the reservation and surrounding areas through the presence of diverse business enterprises, infrastructure, and robust social services

4.1.6 ITKN GOALS, OBJECTIVES AND TASKS IDENTIFIED AS PART OF THE MAIN STREET ITKN (PLANNING) PROJECT

At a September 18, 2019, brainstorming session between Tribal and State of Kansas and Nebraska leaders, the following goals, objectives, and tasks were identified for the Iowa Reservation. These goals and their underlying strategies address systemic issues and opportunities which have the potential to transform the region's economic growth patterns and aid in the transition from a light manufacturing, government, and basic services centered economy to one attracting knowledge-based companies in advanced manufacturing and other high-growth fields.

GOAL 1: Create a Department of Agriculture Which Supports Local Businesses, Regenerative Agriculture, and Historical/Cultural Preservation While Bolstering Current Ag-Related Businesses Owned by the Tribe.

Objective 1:

Consolidate Government Land Management Programs Under One Roof and Lead Under Regenerative Ag Vision/Mission (Fish and Wildlife (Internships), Industrial Hemp Department, Land Management and Development)

Recommended Partners:

Haskell University, Highland Community College, Tam Global Consultants, Understanding Ag LLC-Soil Health Consultants, Nature Conservancy in Nebraska, USDA Rural Development, NRCS, EDA, ANA, Other Universities, Native American Agriculture Fund.

Tasks:

- Develop New Ordinances, Codes, Rules, and Regulations to Support the Development of the Department of Agriculture.
- Create New Ordinances, Codes, Rules, and Regulations to Support Regenerative Ag. Vision and Key Tenants (such as limiting pesticide use during certain times

of day to limit drift, or limiting tilling of land to reduce erosion, water use, and soil degradation) Within Dept. Of Ag.

- Trade Programs to Facilitate Inter-Tribal Trade, Farmer's Markets, and Local Food Systems. (U.S.D.A. Nutrition Program)
- Form Ag-Related Small Business Administration (SBA) to Support Ag-Related Businesses and Start-Ups.
- Internships and Apprenticeship Programs for Tribal Members
- Partnership with Local Universities, Colleges, and Private Businesses.
- Educate Public on Regenerative Agriculture, Cover Crops, Water Conservation Use Practices, Grants and Loans from Federal Programs, Tillage, Grazing, and Rangeland/Forestry Management.
- Create Land Management and Development
- State Forestry Department: Field office on the reservation State Forestry contact
- Establish Native Plant Conservation Center and Nursery – Education and Science Paradigm (Non-profit)
- Establish Food Forest (nuts, fruits, etc.)
- A management plan for Native Medicinal, Food and other culturally-significant plants on the reservation
- Establish education project for youth on native plants, foods and habitats

Objective 2:

Break-Out Ag-Related Businesses (Farm Operations, Bee Farm, Hemp Farm, Chickens, Beef/Cattle, Fruit/Nut/Berry Production) Into Separate Non-Governmental Businesses (such as CWC) and Expand Current Operations.

Recommended Partners:

Haskell University (Business Dept.), Highland Community College (Business Dept.), Tam Global Consultants, Seven Sons, USDA Rural Development, NRCS, EDA, ANA, Other Universities, Native American Agriculture Fund.

Tasks:

- Create Workforce Development Opportunities through the creation of management and operational teams to support each of the Ag-related businesses.
- Invest into Industrial Hemp Farming Operation
- Farm Operation –
 - Diversification of crops towards a more resilient system (specialty crops)
 - Creating separate LLCs under farm itself – (would like to have all businesses structured underneath Farm Operation/sister companies)
 - Livestock & Produce: beef/cattle operation, chicken/broilers/eggs, Butchering, processing, warehousing, distribution, delivery, vegetable production
 - Hemp business: hemp product manufacturing, hemp processing, hemp cigarettes, production, warehousing, distribution, delivery
 - Corn and Soy: transition over to non-GMO

- Cover crop business
- Development of Farm Cooperative

Objective 3:

Create Native Plant and Food Sovereignty Program that Develops and Strengthens Food Resiliency and Access to Quality Food.

Recommended Partners:

New Century Ag, The Nature Conservancy of Nebraska, Natural Park Service, Natural Refugee, Nebraska DOT (offered to come this spring to restore droopy hallow, have to make it a condition that they “Dylan is the main contact with Neb. DOT), NRCS, Mike Ogden (building an area for addition to C-store for off-brand products, has contacts),

Tasks:

- Establish Conservation and Reserve Center.
- Iowa and Sac Fox Museum: In the process of acquiring that from the state.
 - Partnership with Highland Community College for management and maintenance, ag education
 - Kansas Historical Society Partnership.
- Area with paved road, where hives are. CRP area across from Three Elder’s house.
 - Veterans facility, area for hemp houses (resilient food sources, greywater reuse, innovative sustainability, off-grid, tornado-proof, permaculture village.
- Establish Native Plant Conservation Center and Nursery – Education and Science Paradigm (Non-profit)
- Establish education project for youth on native plants, foods and habitats
- Establish Food Forest (nuts, fruits, etc.)
- A management plan for Native Medicinal, Food and other culturally-significant plants on the reservation

GOAL 2: To create and develop steps towards energy sovereignty utilizing renewable energy.

Objective: To install a Microgrid

TASKS:

1. Apply for DOE-OIE Grants

The ITKSNE is pursuing energy sovereignty with solar microgrid energy, eco-village, and creation of a Tribal Utility Authority (TAU) which will promote social welfare and community development in ways that enable the tribe to be self-sufficient and provide economic and energy security for reservation citizens. The ITKN plans to establish energy self-sufficiency, resiliency, and security which supports its

sustainability goals, creating a framework to expand financeable engineering for a much bigger 100 % renewable system. The tribe believes it is important to incorporate its traditional ideas into a modern business model and that in today's environment it is necessary for the future.

2. Establish and Tribal Utility Authority

Within the TUA organization, there are two distinct functions. The operations side is generally responsible for the engineering, design, warehouse, inventory, construction, trouble calls, outage response, maintenance, system operations, and safety. The business side is generally responsible for rate setting, regulatory compliance, accounting, customer billing, new connections, customer questions, human resources, power purchases, obtaining insurance, administrative functions, and legal tasks. The size and type of both the business and operating sides of the organization are dependent upon the service area, the number of customers and whether the services for each are performed internally or by an external third party.

Typically, the TUA follows the tribal employment policy to ensure that qualified tribal members are given preference in TUA hiring. Staff would be added as required to balance customer needs and operating costs, but the tribal capacity building would likely necessitate the expense of specific training to ensure personnel possess the skill levels needed. The Tribal Utility Authority (TAU) will allow the following:

Tribal Goals

- a. The common primary goal for establishing a TUA on a reservation is to provide reliable electric service at competitive prices to residents and commercial enterprises.
- b. Energy Self-Sufficiency
 - Energy Knowledge Base – Ultimately, staff will become knowledgeable regarding energy issues and can provide advice to tribal leaders.
 - Opportunities for Ownership of Generation – Eventually, staff will evaluate the cost/benefits of participation in generating station ownership as well as opportunities to develop renewable energy projects on the reservation.
 - Cost of Energy – Keep rates as low as possible while observing sound business practices.
- c. Customer Service
 - Establishment of a Local Presence and Jobs. The TUA office could be tribally and staffed by local people, providing local employment opportunities in both the administrative and technical fields such as, including but not limited to, those listed below:

Administrative

Customer Service
Billing
Accounting
Human Resources

Technical

Engineering, Designing, Metering and Lineman

Provide Convenience and Flexibility – The TUA’s plan could provide increased flexibility over time for customers to be able to access information and utility services online. Also, a local TUA could work with its customers to establish the best billing approach for their customers, such as Levelized billing (average annual payments over twelve months), pay-as-you-go, or billing day scheduling flexibility.

Improved Customer Service – By being local, the TUA could personally know their customers and their needs, and over time, provide more efficient service, such as same-day turn-on service.

Provide New Services – Ensure that tribal members historically lacking service can receive service by gradually extending service to underserved areas of the reservation.

Service Reliability

Staff Commitment – Staff is on-call 24/7 to respond to outages and service problems.

Improved Response Time – As service is established, response time for restoring power to those facilities controlled by the TUA after interruptions could be reduced.

Improved On-Reservation Service Reliability – Over time staff will undertake upgrades of existing electric facilities, expanding the electric system and reinvesting the returns back into reservation electric facilities.

- d. Formation Documents-The formation documents need to clearly define the goals of the organization, the governing structure, board duties, and board responsibilities. Formation documents need to allow for the TUA to enter into agreements such as for transmission and purchase power requirements. As stated previously, it is recommended that tribes contact existing TUA’s for input regarding formation documents.

The formation documents should include, but may not be limited to the following:

Establish clear rules for the organization

Delineate tribal government and TUA Board

Define the duties and responsibilities of the TUA Board

Duties and responsibilities of the TUA

Grant authority to TUA to enter into agreements with non-tribal entities

- 3. Build and Install microgrid for the casino

The Iowa Tribe of Kansas and Nebraska is collaborating with R2B Microgrid Solutions, Green Energy Corp, Oregon State University to design, construct and operate a resilient community microgrid. The project enjoys broad community support throughout the reservation, as well as local businesses. The proposed community microgrid will bring several important benefits to the reservation during an electrical outage including comfortable and safe shelter to the Iowa Tribe citizens, as well as the non-Natives who live within the reservation boundaries, food and medicine, and staging and logistical facilities for emergency personnel. During normal utility conditions, the microgrid will help the four critical facilities use greener power and save money on their electric and gas bills.

The proposed microgrid project is a 1MWdc ground-mounted solar array with a 500kW/2000kWh battery system integrated with an existing 500kw diesel generator designed to improve the reliability of electrical service with an emergency response goal for four critical facilities: Casino White Cloud, the fire station, the police station and gas station located on the Iowa Tribe's reservation. This will allow the tribe to reduce their carbon footprint while promoting a sustainable environment which drives economic growth by reducing energy costs, increasing reliability, creating educational opportunities and new jobs.

The solar community microgrid will allow the tribe to establish a renewable energy immersion program which will enrich the educational experience for all members of the reservation to learn real-life experiences by providing energy to the community and seeing the benefits to society. The project will provide greater insight into the evolution of the grid by providing the immersion experience. The project will contract local services to ensure that all opportunities are intended to stay within the community. By providing hands-on experience, local service providers will have the ability to have a greater understanding of the potential while learning a new trade and this helps to create jobs at many levels from design, construction, operations, etc.

Providing cheaper and cleaner power means lower cost to businesses and consumers which allow for more disposable income to be put back into the community and it will become a showcase sight that will drive interest from other communities to generate a demand for emergency response and renewable energy projects in the surrounding areas. This creates the need and demand for tribe formed DEVCO to formulate and assist other communities deploy microgrids which creates more jobs and provide cleaner and cheaper power to those who may not have access to renewable energy.

4. Build and Install microgrid for housing

The ITKSNE is pursuing energy sovereignty with solar microgrid energy, eco-village, and creation of a TAU which will promote social welfare and community development in ways that enable the tribe to be self-sufficient and provide economic and energy security for reservation citizens. The ITKN plans to establish energy self-sufficiency, resilience, and security which supports its sustainability goals, creating a framework to expand financeable engineering for a much bigger 100 % renewable system. The tribe believes it is important to incorporate its traditional ideas into a modern business model and that in today's environment it is necessary for the future. The project is expected to be a model for other native communities and other non-tribal governments. The solar microgrid will be sized to fully support the tribe's HUD residences in an off-grid capacity.

The reservation suffers from approximately 20-25 power outages throughout the year, affecting homes and local businesses. These outages can have a detrimental effect on tribal and non-tribal members', who live within the reservation boundaries, health and safety. These brown and blackouts are caused by the reservation being at the end of the line for the local electrical company. Severe weather also contributes to these outages. The proposed project will cut carbon dioxide emissions, save money, secure energy availability, and avert a future energy crisis.

First and foremost, the tribal and non-tribal citizens living in the reservation's HUD housing will benefit from this proposed project. Currently, the reservation has 76 tribal households with an annual income between 50-80% median income (#6) and 53 households with housing cost burden greater than 50% annual income (#1). Many of these residents reside in the projected project area. This proposed project of affordable housing-related infrastructure will focus on establishing tribal energy independence and utility savings for residents in tribal HUD housing, thus alleviating the burden of the high cost of energy costs low-income residents must pay every month.

5. Establish workforce development training around renewable energy

Workforce development and training are essential components to a 21st-century economy ITKN reservation to achieve possibilities of the clean energy economy. The following are important:

- Training building and operations staff to properly operate and maintain building systems
- Providing on-the-job training for new clean energy workers
- Supporting internships for students looking to gain hands-on skills at a clean energy company
- Enhancing curricula to meet the demands of clean energy employers
- Establishing a talent pipeline that can reduce the business cost of hiring new workers

Also, the following programs can be established:

Solar Craft Apprenticeship Program – Investment into an accredited or otherwise recognized apprenticeship program over a period not to exceed 4 years, for particular crafts, trades, or skills in the solar and wind industry.

It should be the goal and objective to implement job training programs that:

Establish a pool of trained installers who will be able to work on the distributed generation and community solar projects the ITKN seeks to develop.

Assist in the development of a workforce with the requisite knowledge, skills, training, experience and competence to perform installations in the electric industry, including but not limited to installations enabled by the ITKSNE.

Fund job training programs through community-based, diversity-focused organizations that strive to provide participants with development, economic or career-related opportunities within, but not limited, to the solar and wind industry.

Identify partnership opportunities within training programs to maximize the societal benefits (Highland CC, K-State)

GOAL 3: Feasibility Study and establishment of 8(a) Business Development program

Objective: Establish 8(a) business development program

Tasks:

- Identify potential 8(a) business opportunities
- Do market research and feasibility
- Formally establish a new business entity
- A detailed assessment of business and likelihood to achieve certification
- Report to be generated and Application strategies are developed
- Remedy issues and build capacity
- Apply for 8(a) under SBA
- Announce and Market 8(a) entity

GOAL 4: Feasibility Study and establishment for Foreign Trade Zone

Objective: Establish Foreign Trade Zone

Tasks:

- Identify potential FTZ business opportunities
- Do market research and feasibility/Establish MOU
- Formally establish a new business entity
- Detailed assessment and structure for FTZ as well as construction building plans

- Report to be generated and Application strategies are developed
- Remedy issues and build capacity/land
- Apply for FTZ as a general-purpose
- Activate your license through the U.S. Customs and Border Protection (CBP)
- Begin construction to meet MOU/LOI agreements
- Establish 3rd party FTZ management
- Market FTZ to fill vacant spaces if applicable.

GOAL 5: Feasibility Study for Agritourism, Ecotourism, Heritage (Culture History) Tourism

Objective 1: AGRITOURISM- Establish Iowa Farms (as a Destination Farm experience)

Tasks:

- Tribal Resolution formalizing Iowa Farms as agritourism project
- Feasibility Study:
 - Evaluate/seek funding sources and partnerships (AIANTA, ANA, etc.)
 - Plan trails, attractions, programming, farm to table meals/products
 - Attraction planning: Agricultural Center; Lodging, etc. Hemp, Animals, etc.
- Execute based on Findings

Objective 2: ECOTOURISM- Establish Iowa Tribal National Park

Tasks:

- Tribal Resolution establishing Iowa National Park (units include Rulo Bluffs)
- Feasibility Study:
 - Evaluate/seek funding sources and partnerships (AIANTA, ANA, etc.)
 - Plan trails, attractions, programming, training
 - Attraction planning: Wildlife Education-Rehabilitation Center with Cabins/Campsites
- Execute Based on Findings

Objective 3: HERITAGE (CULTURE/HISTORY)- Iowa Heritage Trails

Tasks:

- Tribal Resolution establishing Iowa Heritage experience
- Feasibility Study:
 - Evaluate/seek funding sources and partnerships (AIANTA, ANA, etc.)
 - Plan trails, attractions, programming, training
 - Attraction planning: Plan for Iowa Cultural Center; interpretation of reservation sites and programming; Iowa arts, etc.
- Execute Based on Findings

GOAL 6: ITKN Policy, Code, and Ordinance Updates

Objective 1: Update ITKN Tax Policy

Tasks:

- Gather information on proposed state tax changes and impact on tribal business operations
- Research tax codes of other Kansas Tribes
- Review current ITKN tax codes for impact on reservation businesses; make any recommended revisions
- Monitor other Kansas tribes to determine if they are in tax compact negotiations with the State of Kansas; evaluate whether a tax compact desirable

Objective 2: Adopt Business Entity Code

Tasks:

- Gather and review sample codes
- Draft new code
- Adopt new code

Objective 3: Establish and Maintain Online Directory of Businesses Operated by ITKN and ITKN Tribal Members

Tasks:

- Discuss project with website vendor, including ability of ITKN staff to update and maintain the directory and any additional cost issues
- Gather and post directory information from tribal business managers and known tribal member business owners
- Solicit additional directory information from tribal membership via email and newsletter announcements

Objective 4: Negotiate and Implement New Fire Protection and Police Mutual Aid Agreements

Tasks:

- Gather all current and expired mutual aid agreements with surrounding jurisdictions
- Designate jurisdictions for new/updated agreements and list of key provisions desired
- Approach mutual aid jurisdiction representatives to negotiate new/updated agreements
- Negotiations
- Finalize agreements

Objective 5: Adopt Freedom of Information and Privacy of Information Ordinances

Tasks:

- Gather and review sample codes
- Draft new code
- Adopt new code

4.1.7 PRIORITIES IDENTIFIED BY THE MEMBERS IN THE CEDS SURVEY

The top priorities for economic development on the Reservation that were identified by the 51 CEDS Survey respondents, in order of priority, include the following:

1. Provide financial support to individuals who are starting their own business
2. Attract businesses to the Reservation
3. Increase the Tribes' gaming activities/venues
4. Develop or support retail businesses that sell food, clothing, gas, or other consumer products
5. Develop Tribally-owned agriculture businesses
6. Improve utility infrastructure such as water quantity, sewage treatment, waste disposal, access to power
7. Develop or support businesses that are in or in support of the health care and education industry
8. Develop or support businesses that take advantage of tourism

4.2 ACTION PLAN

The following action plan outlines the sets of economic development goals and priorities for the Iowa Reservation. Where possible, the Action Plan lists specific, measurable, action-oriented, realistic and time-bound (SMART) objectives and steps that ITKN and its partners plan to take to accomplish these goals. Some of these objectives are scheduled to be accomplished within the next 1 to 5 years, and some are long-range goals. Where known, the objectives include potential funding sources, as well as a section for "Measures of Success" to aid in the evaluation of whether or not the objectives have been reached.

The goals, objectives, and initiatives have been formulated through public involvement, stakeholder interviews, and committee input to support the ITKN Tribe's Vision for Prosperity. Following the goals, objectives, and initiatives are the Priority Activities, which outline the starting point for each goal and effectively jumpstarts the implementation of the Region's CEDS. This Action Plan is a work in progress and it will be revised as additional information comes to light, or as priorities change.

GOAL 1: Create a Department of Agriculture which supports local businesses, regenerative agriculture, and historical/cultural preservation while bolstering current ag-related businesses in the community.

Objective	Priority (Objective)	Lead (Objective)	Task	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Consolidate Government Land Management and Agriculture Programs/Departments Under One Roof and Lead Under Regenerative Ag Vision.	High	Tim Rhodd & Lance Foster-ITKN Committee Scott Elrod – Fish and Wildlife Officer Keith Simmonds – Farm Manager Jimmy Lunsford – Ioway Bee Farm Manager David Tam Yuen – Tam Global Consultants	1. Develop New Ordinances, Codes, Rules, and Regulations to Support the Development of Department of Agriculture	EDA, ITKN Government, USDA Rural Development, American Heart Association (Codes, Ordinances, and Regulations), Bureau of Indian Affairs (Pheasant Quail Restoration), New Century Ag, NRCS, EPA (Funding for monitoring and regulating ESGS use, New Market Tax Credits, First Nations Development Institute, Local Economic Development Programs, Farm Co-Op	Ongoing / From January 2021 to June 2022; 12 - 24 Months	Fish and Wildlife - Starts with interns, moves to hiring 1 - 2 PT/FT employees. Scotty would be promoted to leadership role with FT employment	Government land, wildlife, and agriculture programs are consolidated under one department.
			2. Develop New Ordinances, Codes, Rules, and Regulations to Support Regenerative	NAAF, AHA, ITKN Gov., USDA, BIA	Ongoing / From January 2021 to June 2022; 12 - 24	Industrial Hemp Department - 1 Operations	Sustainable land management and conservation practices are integrated into land use

			Agriculture Vision and Key Tenants (such as limiting pesticide use during certain times of day, or limiting tilling of land to reduce erosion, water use, and soil degradation) within the Department of Agriculture.		Months	Manager	and management ordinances. Indicator of success: cover crops are used on over 50% of all crop land within the reservation.
			3. Trade Programs to Facilitate Inter-Tribal Trade, Farmer's Markets, and Local Food Systems	NAAF, BIA, Crop Mobster, USDA, FSA, EDA	Ongoing / From January 2021 to June 2024; 36 months	Department of Agriculture - 5-person advisory board (2 from EC, 1 from local farmers, 1 from consultant/ outside party, 1 from youth ag board/individual), 1 FT Department Director, 1 FT Operations Manager	Ioway Department of Agriculture launches small business support tools for tribal ag-related businesses. Indicator of success: there is an increase in the formation of ag-related businesses within the reservation.
			4. Form Native Agriculture CDFI Non-profit Group to support Native American Farmers, Ranchers, and Fishers.	ITKN Gov.	Ongoing / From January 2021 to June 2023	Land Management and Development - 1 FT Operations Manager	ITKN CDFI is formed. Indicator of success: local businesses begin applying for small business

							loans.
			5. Internship and Apprenticeship Programs for Tribal Members to Gain New Skills Related to Agriculture, Business Development, and Entrepreneurial	ITKN Gov., NAAF, SBA, BIA, FSA, USDA, EDA	Ongoing	Year One - Current Employees +1 FT/PT Manager	Youth engagement in agriculture-related groups increases. Tribal members gain new skills opening them up for higher skilled career paths.
			6. Develop Food Safety Program	ITKN Gov., FSA, USDA, Kansas Dept. of Agriculture, EDA, NAAF	Ongoing from September 2020 - 2024	Food Safety (Health and Human Services - Office of Environmental Health - Can inspect and provide recommendations for how to enforce) - 1 PT Operations Manager	The Food Safety Program is developed in collaboration with Health and Human Services. Indicator of success: Health and Human Services Representative audits local ag/food related business and provides report to ITKN Dept. of Ag with recommended actions
			7. Develop Ioway Agriculture Cooperative to help support agricultural employers and workers	FSA, USDA, EDA, ITKN Gov.	2022 – 2025	Private and Federal Lobbyist - 1 FT Director of Agricultural Affairs	Tribal members and non-members farms work together to form

			in business development , financial literacy, market access, technical assistance and training.			(Work with Bureau of Indian Affairs, Local Cooperatives to Maintain Strong and Healthy Relationships)	cooperatives.
			8. Educate Public on regenerative agriculture, cover crops, water conservation use practices, grants and loans from federal and tribal programs, tillage, grazing, and Rangeland/Forestry Management	ITKN Gov., NRCS, FSA	Ongoing; Education Campaign Beginning Fall 2021	Year One - Current Employees, Year Two - New Hires (+1 FT)	Increased literacy of regenerative agricultural practices which leads to an increase in the use of various sustainability practices such as cover cropping, adaptive grazing, low/no tillage.
			9. Create Land Management and Development Department	EDA, ITKN Gov.,	2021 – 2022	Year One - Current Employees, Year Two - Current Employees +1 FT Manager	Creation of departments
			10. Build New State Forestry Department Field Office on the Reservation	EDA, ITKN Gov.,	2021 – 2022/2023	Year One - Current Employees, Year Two - Current Employees & Grow as	Creation of departments

						Needed	
			11. Establish Youth Education Project Teaching About Native Plants, Foods, Medicines, and Habitats	ITKN Gov., NAAF, FSA, NRCS, Haskall, Highland CC	2021 – 2021	Year One - Current Employees and Grow as Needed	Establishment of your programs
			12. Develop Department of Agriculture Board	ITKN Gov.	2021 – 2022	Year One - Current Employees, Year Two - Current Employees +1 FT/PT Admin. Assistant	Creation of board

GOAL 1: Create a Department of Agriculture which supports local businesses, regenerative agriculture, and historical/cultural preservation while bolstering current ag-related businesses in the community.

Objective	Priority (Objective)	Lead (Objective)	Task	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Separate Tribally Owned Ag-Related Enterprises from Government into Tribally Owned Businesses and Expand Current Operations	High	Tim Rhodd & Lance Foster-ITKN Committee Artees Vannett – Ag. Consultant David Tam Yuen – Economic Development Coordinator	1. Separate Farm Enterprise from Government into a Tribally-Owned Private Enterprise. This includes all row crops.	ITKN Gov., Native American Agriculture Fund, Administration for Native Americans, First Nations Development Institute	2021 - 2025	Year One: Current Employees. Year Two: Current Employees + 2 - 3 PT/FT Employees	Row Crop Farm Enterprise is separated into its own business and hires on employees for management, sales, and marketing. Profitability of business increases after change of business structure.

			2. Separate Hemp Farm Enterprise from Government into a Tribally-Owned Private Enterprise	ITKN Gov., Native American Agriculture Fund, Administration for Native Americans, First Nations Development Institute	2020 – 2025	Year One: Current Employees + 5-8 PT Employees. Year Two: Current Employees + 1-2 FT Employees	Hemp Farm Enterprise is separated into its own business and hires on employees for management, sales, and marketing. After 12 months the business is/becomes profitable.
			3. Separate Loway Bee Farm from Government into a Tribally-Owned Private Enterprise	ITKN Gov., Native American Agriculture Fund, Administration for Native Americans, First Nations Development Institute	2021 – 2022	Year One: Current Employees + 1 FT Employee. Year Two: Current Employees + 1-2 PT Employees	Row Crop Farm Enterprise is separated into its own business and hires on employees for management, sales, and marketing. After 6 months the business becomes profitable.
			4. Separate Livestock (chicken and cattle) and Vegetable Farm from Government into Tribally-Owned Private Enterprise	ITKN Gov., Native American Agriculture Fund, Administration for Native Americans, First Nations Development Institute	2021 – 2023	Year One: Current Employees + 1 FT Employee. Year Two: Current Employees + 1-2 PT Employees	A transition team is formed to move operations from government owned to privately owned. Business increases

							profitability after a change of business structure.
			5. Invest into Industrial Hemp Farm Enterprise to form Industrial Hemp Processing Facility for Cannabinoid , Botanical, and Mushroom Extraction as Value-Added Addition.	ITKN Gov., Native American Agriculture Fund, Administration for Native Americans, First Nations Development Institute	2020 – 2021	Year One: Current Employees + 2 FT Employees. Year Two: Current Employees + 2 - 3 FT/PT Employees.	An industrial hemp processing facility is developed to process all hemp from Hemp Enterprise as well as other local producers. The Processing Facility becomes profitable after 18 months.
			6. Invest into Industrial Hemp Farm Enterprise to develop Hemp Cigarette Manufacturing Facility and Hemp Cigarette Product Line as Value-Added Addition.	ITKN Gov., Native American Agriculture Fund, Administration for Native Americans, First Nations Development Institute	2021	Year One: Current Employees + 2 FT Employees. Year Two: Current Employees + 2 - 3 FT/PT Employees.	An industrial hemp cigarette manufacturing facility is developed as a Value-added addition to Hemp Farm Enterprise. Hemp Farm Enterprise launches hemp cigarette brand for complete vertical integration.

			7. Form Transportation, Warehousing and Distribution Center to Support Ag-related businesses and local food security demands.	ITKN Gov. USDA Rural Development, FSA, EDA, First Nations Development Institute	2023 – 2025	Year One: Current Employees + 2 FT Employees. Year Two: Current Employees + 1 - 2 FT Employees.	Warehouse and Distribution Facility is erected with partnerships between local ag producers and state food distribution centers for a more localized food system.
			8. Diversify Farm Enterprise Crops into Specialty Crops	ITKN Gov., USDA Rural Development, NRCS, FSA, NAAF	2021 – 2024/2025	Year One: Current Employees. Year Two: Current Employees + 1 FT Employee + 1 PT Employee	After 24 months multiple acres of farmland are transitioned over to specialty crop production. Kansas City restaurants begin purchasing vegetable crops from Farm Enterprise. Casino White Cloud begins purchasing 25% of its produce from Farm Enterprise.
			9. Transition Farm Enterprise GMO Row Crops to Non-GMO Crops	ITKN Gov., USDA Rural Development, NRCS, FSA, NAAF	2021 – 2024	N/A	After 24 months 50% of corn and soybean acreage are transitioned

			(Non-GMO Corn and Soybeans) to increase value of crop				over to Non-GMO crops.
			10. Develop Agriculture Farm Cooperative	ITKN Gov., USDA Rural Development , NRCS, FSA, NAAF	2022 – 2023	Year One: Current Employees. Year Two: Current Employees + 1 - 2 FT/PT Employees	Local farmers join together to form an Agricultural cooperative. Ag Coop makes first bulk purchase of fertilizer and seeds for 2021 crop year.
			11. Form Cover Crop Business Under Row Crop Farm Enterprise	ITKN Gov., USDA Rural Development , NRCS, FSA, SBA, First Nations Development Institute	2021 – 2024	Year One: Current Employees. Year Two: Current Employees + 2 - 3 PT/FT Employees	Cover crop seed research team is formed to begin determining market access and penetration.
			12. Form Beef Butchering and Packaging Facility Under Livestock Farm Enterprise	ITKN Gov., USDA Rural Development , NRCS, FSA, SBA, First Nations Development Institute	2022-2025	Year One: Current Employees + 2 - 3 FT/PT Employees. Year Two: Current Employees	Tribally-owned cattle enterprise begins butchering and packaging all of its beef as a Value-Added Enterprise.
			13. Build Farm Store for sales platform of all food	ITKN Gov., USDA Rural Development , NRCS,	2022 – 2025	Year One: Current Employees. Year Two:	Farm Store is erected and the first Ioway

			products made by the tribe as well as other local businesses. In addition, the farm store will operate as a community farmers market area for all local producers.	FSA, SBA, First Nations Development Institute, NAAF		Current Employees + 2 - 3 PT/FT Employees	Farmer's Market begins on the first Saturday of its opening week.
			14. Expand Livestock and Produce Farm Enterprise to include Buffalo and Broiler Chickens	Intertribal Buffalo Council, NAAF,	2021 – 2023	Year One: Current Employees. Year Two: Current Employees + 1 FT Employee	The first herd of bison are placed back onto the reservation as an addition to the adaptive grazing program led by the Livestock and Produce Farm Enterprise.
			15. Expand and Invest into Livestock and Produce Farm Enterprise to start an Aquaponics Farm to service the local community and tribally owned casino.	ITKN Gov., NAAF, ANA, BI	2021 – 2022/2023	Year One: Current Employees. Year Two: Current Employees + 2 FT & 1 PT Employees. Year Three: TBD	Climate Adapted Fish Species are raised at aquaponics farm and are able to be sold to the local community and supply tribally owned casino with fresh fish.
			16. Start Value-Added Tribally-Ow	ITKN Gov.	2023 – 2024/20	Year One: 1F & 1PT	Winery, brewery, distillery

			ned Winery, Alcohol and Spirits Brewery/Dis tillery Using Tribally-gro wn and locally produced inputs.		25	Years Two and Three: TBD	established
GOAL 1: Create a Department of Agriculture which supports local businesses, regenerative agriculture, and historical/cultural preservation while bolstering current ag-related businesses in the community							
Objective	Priority (Objective)	Lead (Objective)	Task	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Develop Access to Quality Foods and Strengthen the Resiliency of the Local Food System through a Native Plant Nursery and Conservation Center and Food Sovereignty Program	Medium	Lance Foster-ITKN Committee Artees Vannett – Ag. Consultant Melissa Prater-Coon ce – United Tribes Program Manager Scott Elrod & Mike Ogden – Fish and Wildlife Officer	Plan and Build a Native Plant Nursery and Conservation Center focused on conservation and restoration of local areas and educating the community on native plant habitats, identification, ethnobotany, and areas of support.		2023 – 2024/2025	N/A	Completed building of nursery and conservation center
			Establish Conservation and Reserve Center as managing organization for conservation/nat ure reserve areas located within the		2022 – 2025		Center established

			reservation.				
			Establish education program with local Boys and Girls club.		2021		Program established
			Expand Native Plant Nursery with Establishment of Native Food Forest Farm Enterprise.		2021 – 2022/2023		TBD
			Iowa and Sac and Fox Museum acquisition and repurposing for ag- education and business incubator.		2023 – 2025		TBD
			Management and Conservation plan is developed in coordination with Iowa Tribe Department of Land Management and Private Land Owners for protection of native plants and animals.		2022 – 2023/2024		TBD
			Native Plant Nursery Establishes Native Plant Herbal		2022 – 2024/2025		TBD

			Apothecary, Extraction, and Distillation Facility.				
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GOAL 2: To create and develop steps towards energy sovereignty utilizing renewable energy. (\$5 million cost estimate)							
Objective	Task	Priority (Task)	Lead (Task)	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Establish a micro grid	1. Apply for DOE-OIE Grants- The priority for finding and applying for grants for DOE-OIE grants is high. The ITKSNE is pursuing energy sovereignty with a solar micro grid energy, eco-village, and creation of a Tribal Utility Authority (TAU) which will promote social welfare and community development in ways that enable the tribe to be self-sufficient and provide economic and energy security for reservation citizens.	High	Elyse Towey & Tim Rhodd-ITKN Committee Peter Gregory – Green Energy Corp. David Tam Yuen – r2B Microgrid Solutions Inc./ITKN	Dept. Of Energy – Office of Indian Energy Grant, ITKN, Third Party Finance	2021 - 2023	2	TBD
	2. Establish and Tribal Utility Authority- an opportunity for economic development and job creation, including an estimated 25-30 local construction	Medium	Elyse Towey	Dept. Of Energy – Office of Indian Energy Grant, ITKN, Third Party	2022 - 2025	2-3	Established Tribal Utility Authority

	jobs and subcontracting opportunities. It is an important next step in the development of a green economy for the Iowa Tribe of KS and NE			Finance			
	3. Build and Install micro grid for the casino- The Iowa Tribe of Kansas and Nebraska is collaborating with R2B Micro grid Solutions, Green Energy Corp, Elyse Grant/ Tribe/ In-kind 2020 - 2021 10 High Oregon State University to design, construct and operate a resilient community micro grid. During normal utility conditions, the microgrid will help the four critical facilities use greener power and save money on their electric and gas bills. The proposed micro grid project is designed to improve the reliability of electrical service with an emergency response goal	High	Elyse Towey	Dept. Of Energy – Office of Indian Energy Grant, ITKN, Third Party Finance	2021-2022	10	Deployment of Micro grid

	for four critical facilities: Casino White Cloud, the fire station, the police station and gas station located on the Iowa Tribe's reservation.						
	4. Build and Install micro grid for the housing- The ITKN is pursuing energy sovereignty with a solar micro grid energy, eco-village, and creation of a TAU which will promote the social welfare and community development in ways that enable the tribe to be self-sufficient and provide economic and energy security for reservation citizens.	High	Elyse Towey	Dept. Of Energy – Office of Indian Energy Grant, ITKN, Third Party Finance	2023 - 2025	10	TBD
	5. Establish workforce development training around renewable energy- As educational partners, Highland Community College and Kansas State University will support the project by marketing the	High	Elyse Towey	Dept. Of Energy – Office of Indian Energy Grant, ITKN, Third Party Finance	2021 - 2025	10-15	TBD

	<p>training program and identifying individuals within its students who have an interest or aptitude to work within the power industry. Further training programs will maximize employment opportunities for citizens of the ITKN, reduce unemployment, and aid in the successful implementation of the micro grid</p>						
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GOAL 3: Feasibility Study and establishment of 8(a) (cost estimate \$100,000)							
Objective	Task	Priority (Task)	Lead (Task)	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Establish 8(a)	1. Identify potential 8(a) business opportunities	High	Robbie Craig-ITKN Committee Mary Cronin-Strategy Hub LLC	EDA, Fed. Govt. Funds, Cares Act,	2021 - 2022	2	TBD
	2. Do market research and feasibility	High	David Tam Yuen – r2B Micro	EDA, Fed. Govt. Funds,	Tribe	2	TBD

			grid Solutions Inc./ITKN Committee	Cares Act			
	3. Formally establish new business entity	High	Robbie Craig-ITKN Committee	EDA, Fed. Govt. Funds, Cares Act,	2021 - 2022	2	Federal Contract Awarded
	4. Detailed assessment of business and likelihood to achieve certification	High	Robbie Craig and David Tam	EDA, Fed. Govt. Funds, Cares Act,	2021 - 2022	4	TBD
	5. Report to be generated and Application strategies are developed	High	David Tam	EDA, Fed. Govt. Funds, Cares Act,	2021 - 2022	4	TBD
	6. Remedy issues and build capacity	High	David Tam/Robbie Craig	EDA, Fed. Govt. Funds, Cares Act,	2021 - 2022	6	TBD
	7. Apply for 8(a) under SBA	High	David Tam/Robbie Craig	EDA, Fed. Govt. Funds, Cares Act,	2021 - 2022	2	TBD
	8. Announce and Market 8(a) entity	High	David Tam/Robbie Craig	EDA, Fed. Govt. Funds, Cares Act,	2022 - 2023	2	Federally Registered 8(a) Entity

GOAL 4: Feasibility Study and establishment for FTZ (cost estimate \$80,000)

Objective	Task	Priority (Task)	Lead (Task)	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Establish Foreign Trade Zone	1. Identify potential FTZ business opportunities/tenant	High	Robbie Craig-ITKN Committee, Mary Cronin-Strategy Hub LLC	EDA, Federal Govt. Funds, Cares Act,	2021 - 2022	3	Federally Recognized Foreign Trade Zone
	2. Do market research and feasibility/Establish MOU	High	David Tam Yuen – r2B Micro grid Solutions Inc./ITKN Committee	EDA, Federal Govt. Funds, Cares Act,	2021 - 2022	5	TBD
	3. Formally establish new business entity	High	Robbie Craig and David Tam	EDA, Federal Govt. Funds, Cares Act,	2022-2023	4	TBD
	4. Detailed assessment and structure for FTZ as well as construction building plans	High	Robbie Craig and David Tam	EDA, Federal Govt. Funds, Cares Act,	2022 - 2023	4	TBD
	5. Report to be generated and Application strategies are developed	High	David Tam	EDA, Federal Govt. Funds, Cares Act,	2022 - 2023	4	TBD

	6. Remedy issues and build capacity/land	High	David Tam/Robbie Craig	EDA, Federal Govt. Funds, Cares Act,	2022 - 2023	6	TBD
	7. Apply for FTZ as a general purpose	High	David Tam/Robbie Craig	EDA, Federal Govt. Funds, Cares Act,	2022 - 2023	4	TBD
	8. Activate your license through the U.S. Customs and Border Protection (CBP)	High	David Tam/Robbie Craig	EDA, Federal Govt. Funds, Cares Act,	2023 - 2024	4	TBD
	9. Begin construction to meet MOU/LOI agreements	High	David Tam/Robbie Craig	EDA, Federal Govt. Funds, Cares Act,	2023 - 2024	12	TBD
	10. Establish 3rd party FTZ management	High	Tribe	EDA, Federal Govt. Funds, Cares Act,	2024 - 2025	6	TBD
	11. Market FTZ to fill vacant spaces if applicable.	High	David Tam/Robbie Craig	EDA, Federal Govt. Funds, Cares Act,	2024 - 2025	6	TBD

GOAL 5: Feasibility Study for Agritourism, Ecotourism, Heritage (Culture History) Tourism							
Objectiv	Task	Priorit	Lead	Fundin	Time	Jobs	Evaluatio
		y		g	Fram	Create	n

e		(Task)	(Task)	Source (Task)	e (Task)	d (Task)	Measures (Task)
Ag Tourism	1. Promote and market food products from the tribe	Medium	Lance Foster – Exec. Council ITKN	Tribe	2021 - 2022	2	TBD
	2. Feasibility assessment of various ag tourism opportunities	Medium	Lance Foster	Tribe	2021 - 2022	5	TBD
Eco-Tourism	1. Establishing Iowa National Park	Medium	Lance Foster	Tribe	2022 - 2023	7	TBD
	2. Feasibility assessment of various eco-tourism opportunities	Medium	Lance Foster	Tribe	2021 - 2022	1	TBD
Heritage	1. Establishing Iowa Heritage Experience	Medium	Lance Foster	Tribe	2023 - 2025	4	TBD
	2. Feasibility assessment of Iowa Cultural Center	Medium	Lance Foster ⁵	Tribe	2024 - 2025	3	TBD

GOAL 6: ITKN Policy, Code, and Ordinance Updates							
Objective	Task	Priority (Task)	Lead (Task)	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Update ITKN Tax Policy	1. Gather information on proposed state tax changes and impact on tribal business operations	Medium	ITKN Executive Committee, Finance Department	ITKN	2021 - 2022	N/A	Briefing materials to all Executive Committee members for review

	2. Research tax codes of other Kansas Tribes	Medium	Executive Committee, Finance Department	ITKN	2021 - 2022	N/A	Briefing materials to all Executive Committee members for review
	3. Review current ITKN tax codes for impact on reservation businesses ; make any recommended revisions	Medium	Executive Committee, Finance Department, Business Managers	ITKN	Due April 1, 2021	N/A	Finance Department recommendations to Executive Committee, including any input from Business Managers and legal counsel
	4. Monitor other Kansas tribes to determine if they are in tax compact negotiations with the State of Kansas; evaluate whether a tax compact desirable	Medium	Executive Committee	ITKN	Ongoing	N/A	Report of findings presented to Executive Committee
GOAL 6: ITKN Policy, Code, and Ordinance Updates							
Objective	Task	Priority (Task)	Lead (Task)	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Adopt Business Entity	1. Gather and review	Medium	Executive Committee	ITKN	Due March	N/A	Executive Committ

Code	sample codes				1, 2021		ee meeting with legal counsel to discuss features of new code
	2. Draft new code	Medium	Executive Committee	ITKN	March and April, 2021	N/A	Drafts circulated among Executive Committee Members
	3. Adopt new code	Medium	Executive Committee	ITKN	Due May 1, 2021	N/A	Passage of resolution adopting a new ordinance
GOAL 6: ITKN Policy, Code, and Ordinance Updates							
Objective	Task	Priority (Task)	Lead (Task)	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Establish and maintain online directory of businesses operated by ITKN and ITKN tribal members	1. Discuss project with website vendor, including ability of ITKN staff to update and maintain the directory and any addition	Medium	ITKN Website Staff	ITKN	Due July 1, 2021	N/A	Report results of discussion to Executive Committee

	al cost issues						
	2. Gather and post directory information from tribal business managers and known tribal member business owners	Medium	ITKN Website Staff	ITKN	Monthly beginning April 1, 2021	N/A	Monthly status report to Executive Committee
	3. Solicit additional directory information from tribal membership via email and newsletter announcements	Medium	ITKN Website Staff, Tribal Secretary	ITKN	Due April 1, 2021 for email and quarterly in newsletters issued on or after April 1, 2021	N/A	Confirm announcement in quarterly newsletter
GOAL 6: ITKN Policy, Code, and Ordinance Updates							
Objective	Task	Priority (Task)	Lead (Task)	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Negotiate and implement new fire protection and police	1. Gather all current and expired mutual aid agreements with	Medium	Disaster Mitigation Task Force	ITKN	Due March 1, 2021	N/A	Copies distributed to Task Force and Executive Committee

mutual aid agreements	surrounding jurisdictions						members
	2. Designate jurisdictions for new/updated agreements and list of key provisions desired	Medium	Disaster Mitigation Task Force	ITKN	Due April 1, 2021	N/A	Submit list to Executive Committee for approval
	3. Approach mutual aid jurisdiction representatives to negotiate new/updated agreements	Medium	Rep. designated by Disaster Mitigation Task Force	ITKN	Promptly following approval by Executive Committee	N/A	Negotiation dates set
	4. Negotiations	Medium	Rep. designated by Disaster Mitigation Task Force	ITKN	April through December 2021	N/A	Monthly status reports to the Task Force and Executive Committee
	5. Finalize agreements	Medium	Executive Committee		By end of year, 2021	N/A	Signed mutual aid agreements

GOAL 6: ITKN Policy, Code, and Ordinance Updates

Objective	Task	Priority (Task)	Lead (Task)	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)
Establish tribal business enterprise holding company	1. Create Board, appoint members and transfer responsibilities for oversight of	Medium	Executive Committee	ITKN	Due April 1, 2021	N/A	Passage of resolution

	agricultural, trash collection services, Grandview Oil, and rental property operations						
	2. Research choice of entity issues and transfer of operation issues, including personnel matters and leasing arrangements	Medium	Executive Committee, Enterprise Board	ITKN	Due July 1, 2021	N/A	Adoption of plan choosing a form of entity and detailing steps for the formal transfer of operations
	3. Charter new entity and appoint board (or submit a revised charter for BIA approval if choose Section 17 corporation)	Medium	Executive Committee, New Board	ITKN	Due September 1, 2021	N/A	An entity established (or revised charter submitted for approval if Section 17 corporation)
	4. Complete transfer of operations to a new entity	Medium	Executive Committee, New Board	ITKN	Due September 1, 2021	N/A	Approval of resolution, the effectiveness of transfer documents
GOAL 6: ITKN Policy, Code, and Ordinance Updates							
Objective	Task	Priority (Task)	Lead (Task)	Funding Source (Task)	Time Frame (Task)	Jobs Created (Task)	Evaluation Measures (Task)

Adopt freedom of information and privacy of information ordinances	1. Gather and review sample codes	Medium	Executive Committee	ITKN	Due May 1, 2021	N/A	Executive Committee meeting with legal counsel to discuss features of new code
	2. Draft new code	Medium	Executive Committee	ITKN	May and June 2021	N/A	Drafts circulated among Executive Committee Members
	3. Adopt new code	Medium	Executive Committee	ITKN	Due July 1, 2021	N/A	Passage of resolution adopting a new ordinance

5. EVALUATION AND PERFORMANCE MEASURES

The primary goal of performance measures is to track the progress of the goals and strategies outlined in the CEDS document to ensure regional advancement in all areas of concern.

It is of utmost importance that the ITKN Planning Organization be able to measure its performance to evaluate the successful implementation and development of the CEDS. The following quantitative and qualitative measures have been established to provide an objective way to measure the progress toward achieving the goals identified in the region:

- 1) Number of jobs created after implementation of the CEDS,
- 2) Number and types of investments undertaken in the region,
- 3) Number of jobs retained in the region,
- 4) Amount of private sector investment in the region after implementation of the CEDS, and
- 5) Changes in the economic environment of the region.
- 6) Educational Achievement
 - a. Measured by high school, job corps, and college graduation numbers, the number of training certifications awarded, and the number of partnerships created between educational institutions and workforce organizations.
- 7) Infrastructure Improvement and Expansion. Measured by:
 - a. Increased capacity for new or existing businesses
 - b. Enhanced recreational activities with sidewalks and bicycle/pedestrian paths in areas where none previously existed
 - c. Enhanced tourist activities with sidewalks and bicycle/pedestrian paths in areas where none previously existed
 - d. Improvements in electricity stability
- 8) Environmental and Cultural Resource Protection
 - a. To be aligned with ITKN Natural Resources, Forestry, and Historic Preservation departments annual performance reports.

In addition, for each goal there will be specific and measurable outcomes to be assessed annually and incorporated into the annual CEDS update. The Strategy Committee will also meet bi-annually to

review the progress of the CEDS action plan.

GOAL 1: Create a Department of Agriculture which supports local businesses, regenerative agriculture, and historical/cultural preservation while bolstering current ag-related businesses in the community.

- Land Management and Development Department is created
- Government land, wildlife, and agriculture programs are consolidated under one department
- increase in the formation of ag-related businesses within the reservation
- Number of small business loans granted to local businesses

GOAL 2: To create and develop steps towards energy sovereignty utilizing renewable energy.

- Preliminary architectural and engineering plans and cost estimates completed.
- A built and installed microgrid
- Numbers of jobs created in the construction and maintenance of the microgrid power system.
- Further training programs are implemented to maximize employment opportunities for citizens of the ITKN, reduce unemployment, and aid in the successful implementation of the microgrid.
- Improved reliability of electrical service with an emergency response goal for critical facilities:
- Increased number of homes seeing reduced energy costs.
- Self-sufficiency in economic and energy security for reservation businesses.

Goal 3: Feasibility Study and establishment of 8(a)

- A completed feasibility study and business plan for developing needed infrastructure to assist small business
- Identified industrial opportunity areas to encourage job growth with minimal impact on the environment.
- A sustainable, business incubator program available for Tribal entrepreneurs.
- The number of new businesses created.

Goal 4: Feasibility Study and establishment for FTZ

- Completed study with recommendations
- Constructed FTZ with at least one new lessee.

GOAL 5: Feasibility Study for Agritourism, Ecotourism, Heritage (Culture History) Tourism

- A completed feasibility study and business plan for developing needed infrastructure and generating revenue to support a sustainable local food system
- An upgraded center that is used by Tribal youth, families and others for healthy activities.
- Increased number of visitors to the Iowa Park and Cultural Centers

- Increased use of the food packing facility.

GOAL 6: ITKN Policy, Code, and Ordinance Updates

- Adoption of pertinent resolutions by the ITKN Executive Committee
- Adoption of pertinent plans for each objective
- Implementation of approved plans

6. ECONOMIC RESILIENCE

Economic resilience is a community’s ability to withstand or avoid major disruption to the area economy. Disruptions can be a major downturn in:

- locally-produced goods or services
- consumer spending
- a key industry(ies) that plays a large role in the regional economy
- Other disruptions could be:
 - a natural or human-caused disaster
 - the impacts of climate change
 - closure of a major company and the resulting loss of employment

To respond to these disruptions or shocks to the Reservation economy, the Confederated ITKN economic development entities and emergency response staff members must consider two types of initiatives:

- steady-state or long-term initiatives that help the community withstand an economic disruption, and
- responsive initiatives that improve a community’s ability to recover after a disaster or economic shock.

6.1 STEADY-STATE OR LONG-TERM INITIATIVES

6.1.1 SUSTAINABLE CEDS

The creation of this document, the ITKN’s Comprehensive Economic Development Strategy (CEDS), is a part of the organization’s long-term initiatives. By designing and implementing this plan, the Tribe provides for continued growth and stability.

6.1.2 COMPREHENSIVE RESOURCES PLAN

As described in this CEDS document, economic resiliency within the Tribe will be assured via a series of long-term initiatives which include but are not limited to the development of a new

micro-grid power system to eliminate power outages and reliance on fossil-fuel generators, the implementation of several agricultural initiatives that will see to the food sovereignty and resiliency of the Tribe and its members, and the establishment of a foreign trade zone within the reservation.

6.1.3 PRE-AND POST-DISASTER MITIGATION PLAN

As noted previously, the ITKN has met with Tribal members and local, state and federal entities to prepare a Disaster Mitigation Plan, currently under review for support by EDA CARES. This work will integrate all planning activities on the Reservation related to economic development, land use, natural resources, and disaster and emergency mitigation and response. The local goals of the Tribes' Disaster Mitigation and Response Plan are:

- Enhance Early Warning Systems
- Minimize risk of wildfire at the urban interface (where housing development adjoins the forest)
- Improve fire-fighting capabilities
- Reduce the risk of hazardous material incidents
- Reduce the risk of biological hazards
- Secure integrity of utilities and infrastructure
- Enhance emergency response systems through E-9-1-1
- Reduce impacts from wildfire
- Reduce impacts from flooding
- Secure integrity of cultural sites
- Employ a dedicated regional disaster economic recovery coordinator
- Establish a Foreign Trade Zone to ensure economic stability for Tribal businesses during times of crisis

6.1.4 PANDEMIC

Pandemic mitigation and recovery efforts have become a main focus of the Executive Council and affiliated services' (Health Services, Emergency Services) economic resilience plans in light of the events of 2020.

The White Cloud Health Center LLC, described in section 2.4.6 above, is chief amongst the Tribe's pandemic mitigation response units. Since the start of the pandemic, 43 COVID tests have been conducted at the ITKN health clinic with a reported 42 negatives and 1 pending result as of August 25, 2020.

On the ITKN reservation itself, daycare services were halted from March 18th to April 28th 2020, the local Boys and Girls Club was closed from March 18th to June 19th 2020, the White Cloud Casino was closed from March 18th to June 11th 2020, and the Tribe's Bingo hall was closed from March 18th to June 20th 2020 as a precaution against pandemic outbreak.

In addition to these responses to the pandemic, the ITKN has taken steps to guarantee continued resiliency. Amongst these is the planned creation of a stand-alone COVID 19 Strategy Plan that will

serve as an addendum to the CEDS document. This document will establish the ITKN's response and resiliency plan for the current pandemic and put in place preparatory measures for future pandemic events. Specifically, the ITKN has identified the need for sovereignty – food sovereignty, energy independence, etc. – as priorities in establishing a strategy for preventing, preparing for, and responding to pandemic-related hardships. Plans for this strategy blueprint include the establishment of a Foreign Trade Zone (FTZ) which will allow the tribe to import and store merchandise without being subject to U.S. Customs duties, avoid duty fees by manufacturing products within the FTZ before exporting to the US, and even lease portions of the FTZ for use by other companies. In addition, the proposed strategy provides technical assistance for Tribal businesses in securing 8(a) status which allows them to receive sole-source contracts without the need to bid or compete, participate in 8(a) development programs, and receive priority consideration for federal contracts.

6.1.5 DIVERSIFICATION AND STABILITY

Promoting entrepreneurship, food sovereignty, and activities related to culturally-appropriate tourism are three of the ways that the Tribes are working to expand the diversity of the Reservation economy. Management of Casino White Cloud and the Tribes other corporations and revenue-producing programs rounds out this diversity

Development of a food sovereignty plan and system, expanding alternative means of transportation, promoting energy conservation, and managing the power generation and distribution systems of the Reservation all work to promote economic stability.

6.1.6 WORKER RESILIENCY

Workforce training that strengthens general job skills is a key focus of the ITKN.

1. Entrepreneur training (business planning, accounting, human resources, marketing and more). These skills can transfer to any business operation.
2. Tribal and local vocational rehabilitation programs also provide training for workers transitioning from one industry to another

6.1.7 GEOGRAPHIC INFORMATION SYSTEMS AND EARLY WARNING TOOLS

Tribal geographic information system (GIS) data will be developed to map areas that occasionally or frequently flood, so as to avoid those areas for future development. GIS is also used to map steep slopes, wetlands, prime farmlands, scenic areas and more that also guide development away from potential hazards or sensitive lands. Maps have been created that show areas that would be flooded if any one of the several dams located on the Reservation were to break.

An early warning system will be developed for emergency response personnel to contact individuals living in an area that could be impacted. The Tribes also use GIS for mapping areas with severe

wildland fire potential, and other purposes. Maps are also being created to identify existing and potential development sites.

6.1.8 TELECOMMUNICATION AND BROADBAND NETWORK REDUNDANCY

Rainbow Communications serves the majority of the Tribes' government buildings, health and safety services, and many residential and commercial areas on the Reservation. An effort is being made to install new fiber-optic lines to provide greater redundancy within their system on the Reservation. This redundancy allows for uninterrupted telecommunication and internet services for the majority of their customers should one line be damaged.

6.1.9 PROMOTION

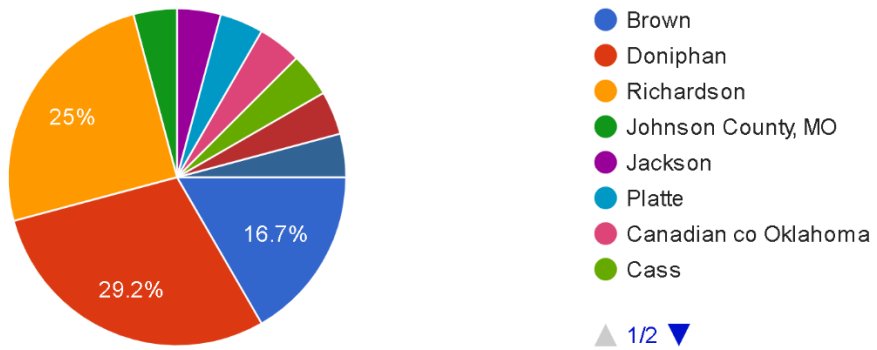
While the Tribes are the main economic driver within the community and continue to promote this fact in a positive light, there remains a small group of vocal individuals who ignore Tribal sovereignty and the positive contributions that the ITKN bring to this special place—their last remaining homeland. Attracting more people to the Reservation who do not understand or respect Tribal sovereignty and cultural and natural resource values can be a detriment to Tribal goals. The Tribes will continue to protect and promote the outstanding cultural and natural resource qualities of the Reservation, but the extent of this promotion to outside entities can only be done with utmost care.

7. APPENDICES

Appendix A: CEDS Survey Results (Except Open Responses)

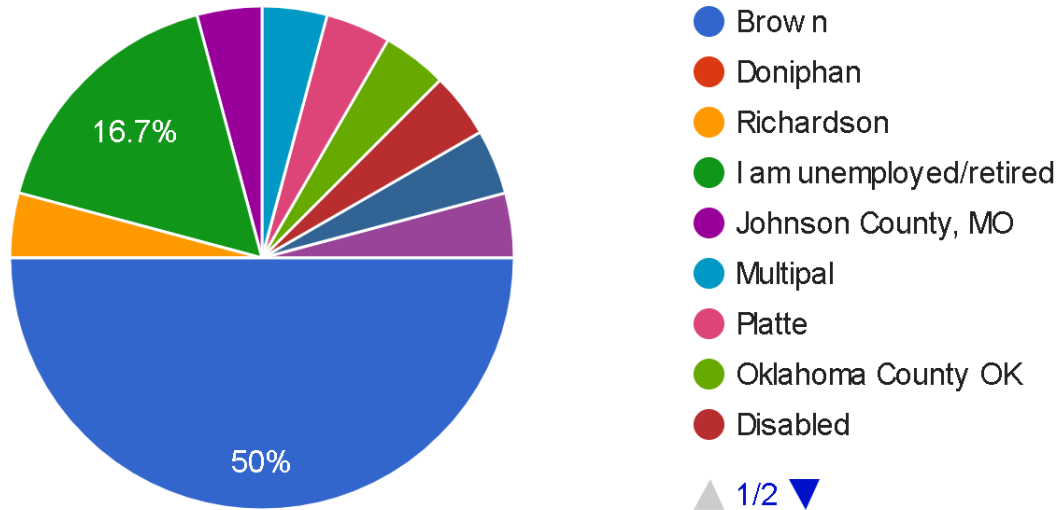
Q1. What county do you live in?

24 responses



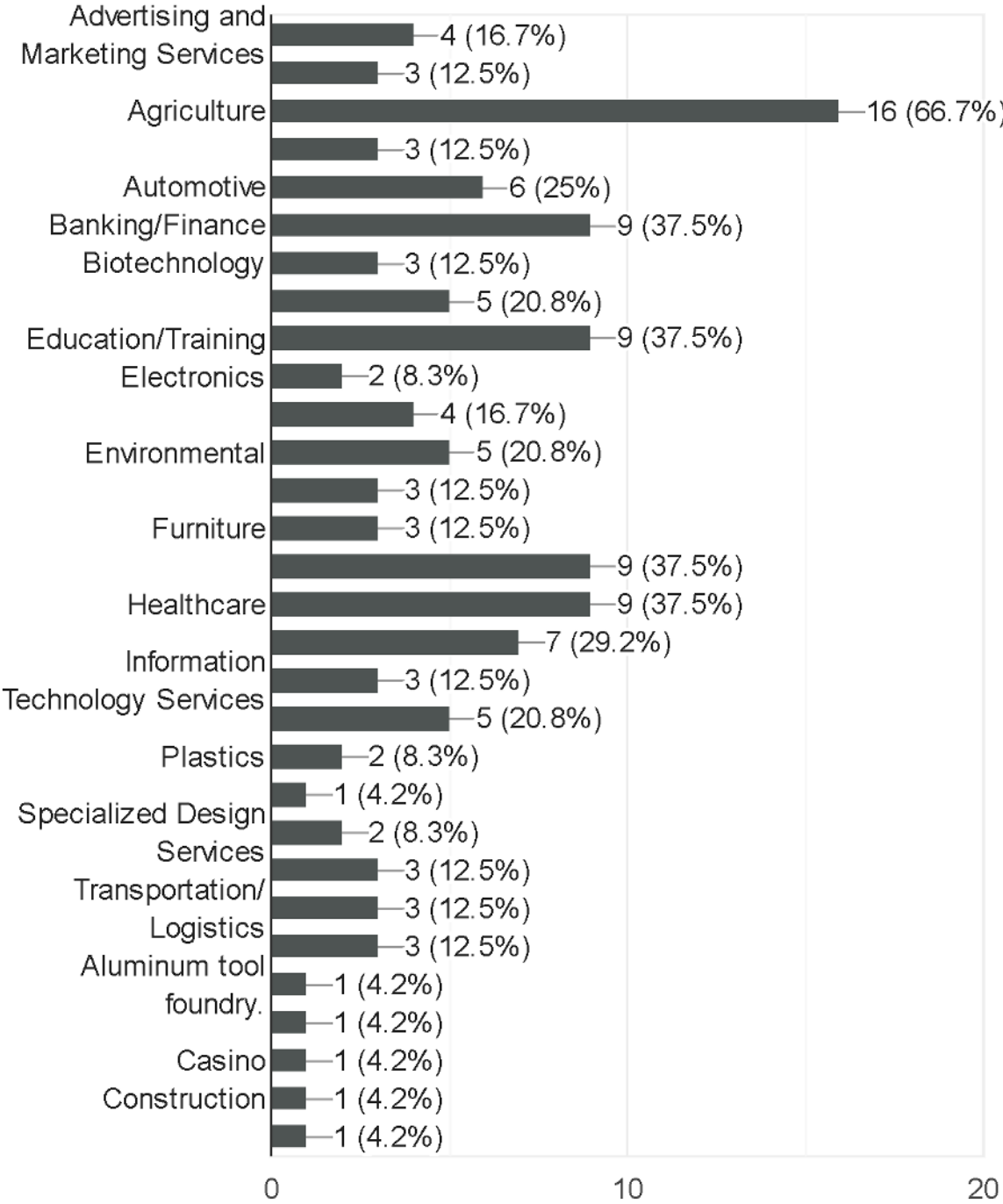
Q2. What county do you work in?

24 responses



Q3. What economic opportunities exist or are developing in your community? Choose all that apply.

24 responses



Q4. How can your community use its best resources to boost the economy?

24 responses

Soil and land
agriculture

Help our elders and people who are in pain

Investment in trade skills training (electrician, plumbing, welding, etc.).

Donating

need to define what goals the community actually has and is willing to work towards

Target store at vacant Shop Ko store

unknown

Expanding

By offering opportunities or experiences that surrounding communities do not offer.

More promotions at the Casino

Support small businesses and schools

Limit sales and number of customers

Central location to 3 states

Assist small business owners

It does not.

Training and expanding for more opportunities.

pay living wages

Education of youth and job training

Be informed

Not sure

Export. Logs

Networking, higher learning and education, and more community/State/state/tribal funding, BETTER HEALTHCARE.

Q5. What adaptive capabilities do you see for the community's economy? Adaptive capabilities might be specific skills in the community's workforce or in the built environment (such as vacant manufacturing plants or box stores) in your community that can guide a strategic renewal process.

24 responses

Soil

agriculture

Helping the pharmacy to help people who have cancer and others who are in chronic pain.

Not many. Too reliant on college student labor, too many retail jobs, not enough good paying jobs, locally.

I don't know

integrative and value-added approaches to what we already have; work force and housing for workers is an issue

Open a business in vacant Shop Ko building

unknown

Training

Tourism experiences. Lots of empty buildings.

More lodging at the Casino

Provide training for specific job skills, as well as supporting new businesses.

stores into food banks

There is an empty department store building

There are vacant box stores and large commercial spaces that are empty

A lot of empty historic buildings that could be repurposed

Yes, a lot of empty spaces that need to be filled.

provide jobs that pay more than \$9/hr

Finding something other than oil field.

Put businesses in the vacant box stores

2 revitalizes the community

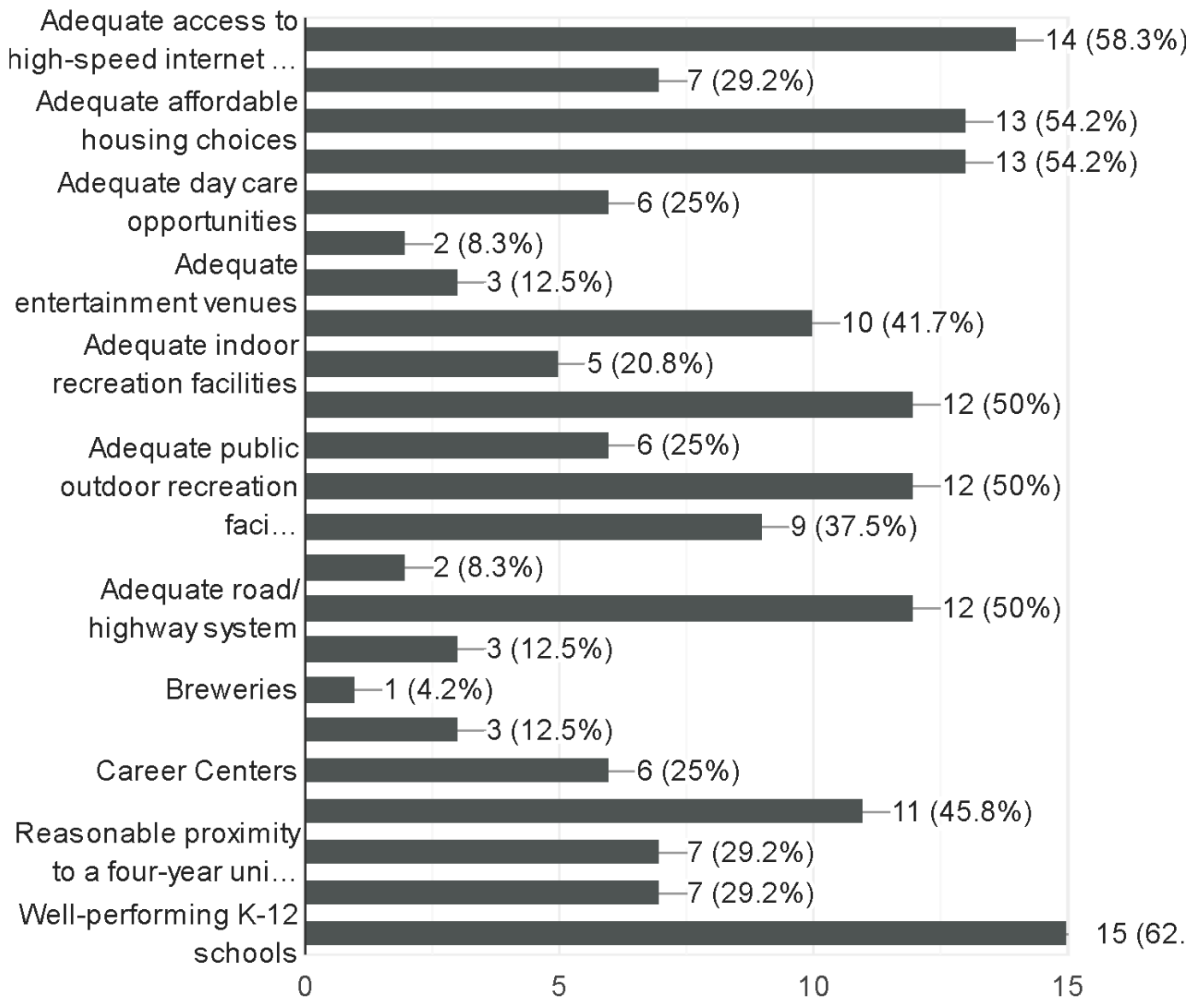
Mills

A wood/paint shop that I would like to turn into a tangible high grade business. Or, higher and better ADA Advocacy as a Certified ADA Advocate for the well being of all.

Q6. Identify the existing community assets from the list below.

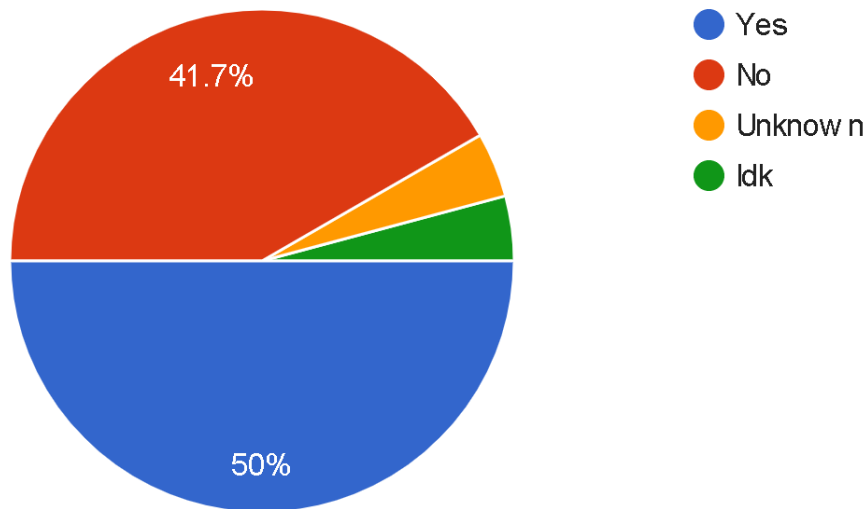
Choose all that apply.

24 responses



Q7. Does your community currently market its assets?

24 responses



Q8. If you answered yes to the previous question, please give some examples of county marketing efforts.

24 responses

N/A

Selling honey at convenience stores

new grain elevators / crops

No

We don't market

i did not answer yes, but this form would not let me click to the next page without writing something here

natural gas

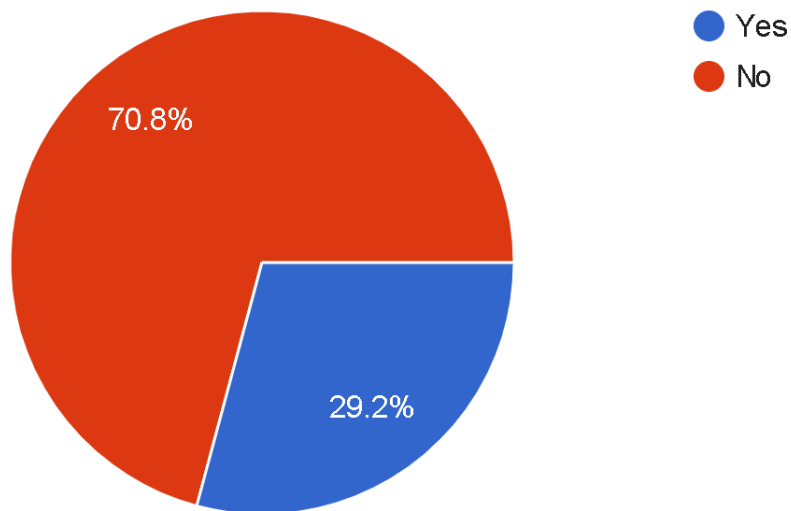
no

Internet

Chamber of Commerce, annual festival, publications
Casino advertisements
teachers and police driving around like a parade to show support
Na
Realtors do some promoting
Chamber and visitors bureau
not at this time
The county is hosting job fairs and meet/greet type events to help build relations between
business/community
Fair, Newspaper
The marketing is poor here
Auto Pilot LLC

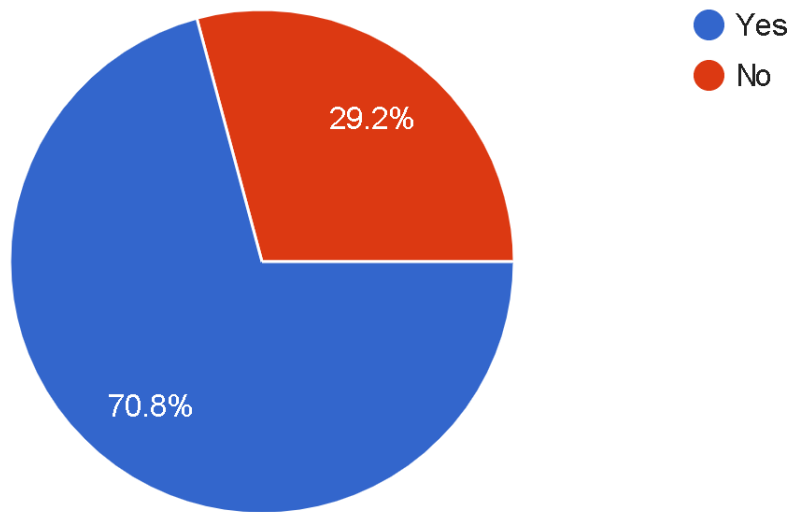
Q9. Does the community you live in have a specific brand it uses for promotion of the area?

24 responses



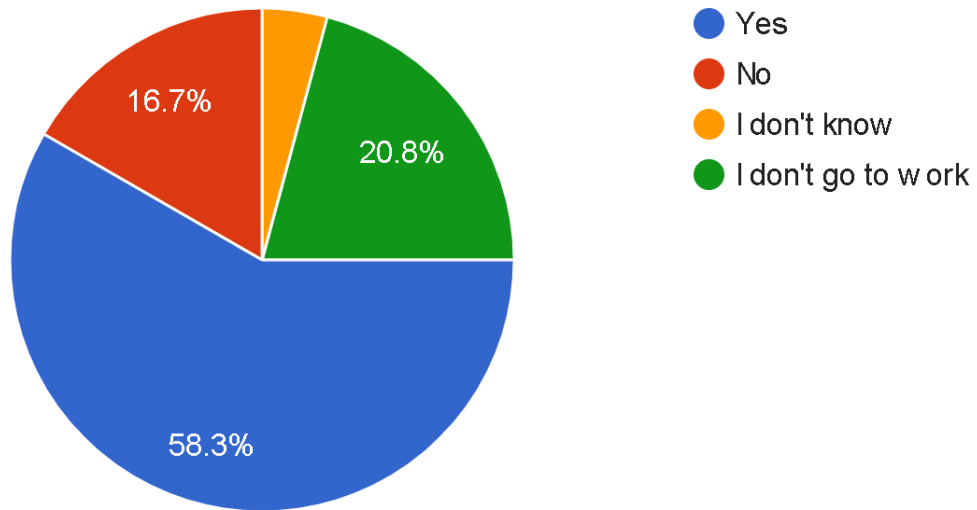
Q10. Do you have adequate high-speed internet access at home?

24 responses



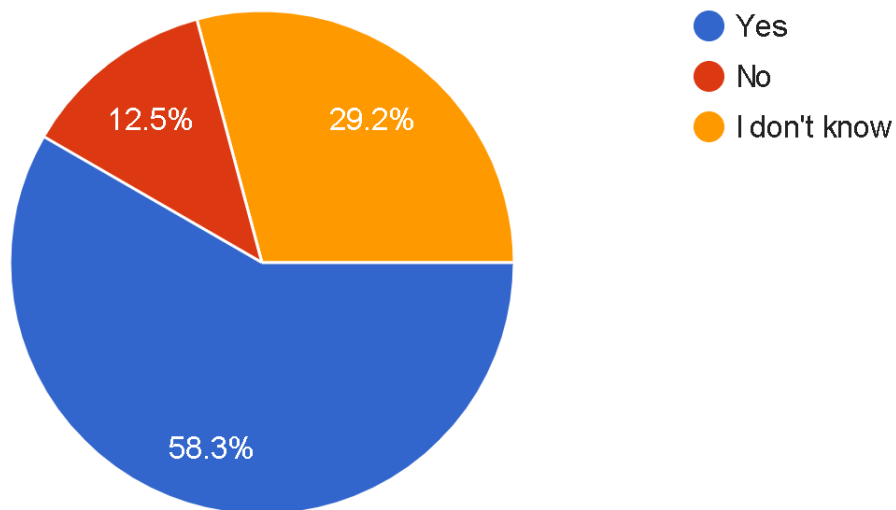
Q11. Do you have adequate high-speed internet access at work?

24 responses



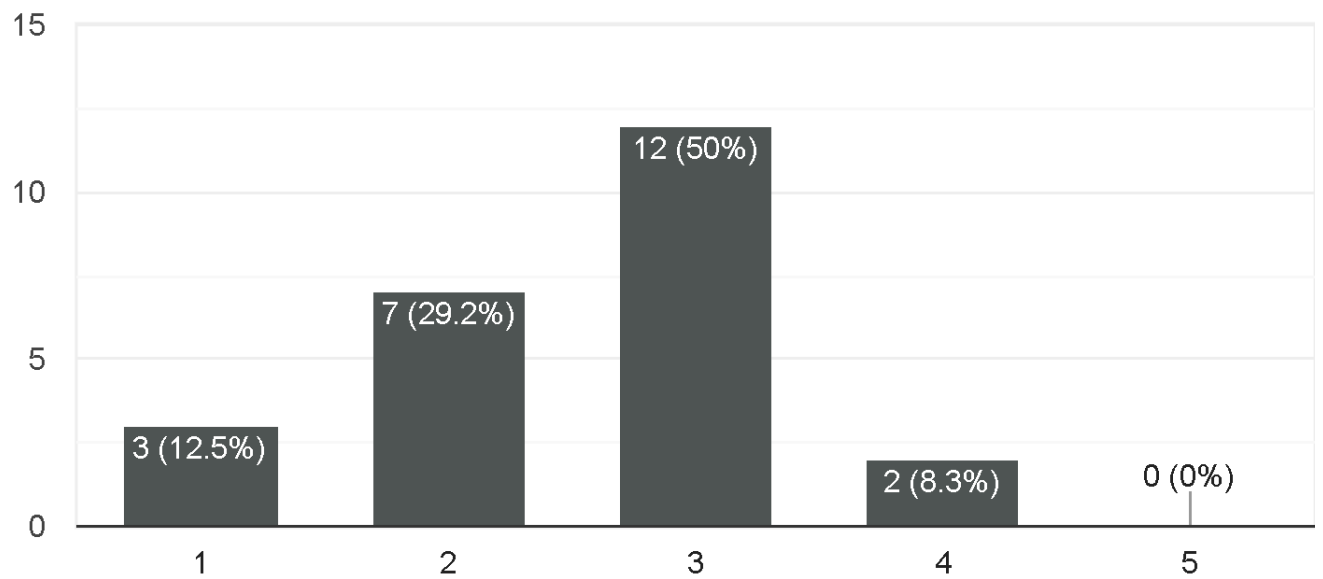
Q12. Do you have adequate high-speed internet access at public spaces?

24 responses



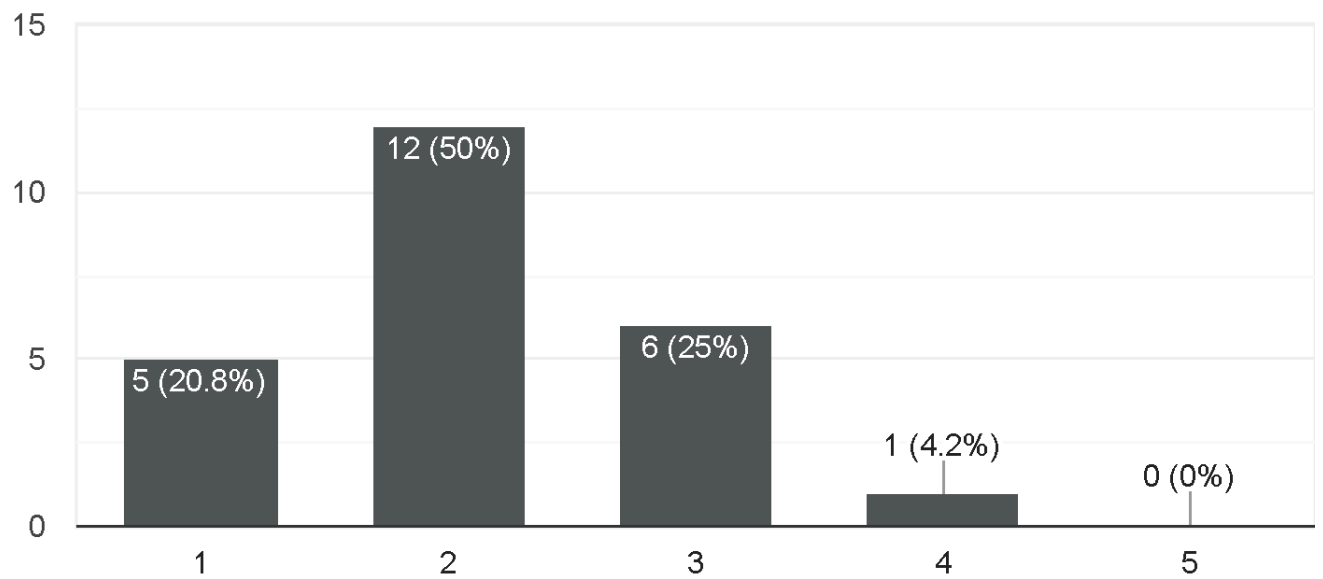
Q13. How well does your community support affordable housing choices?

24 responses



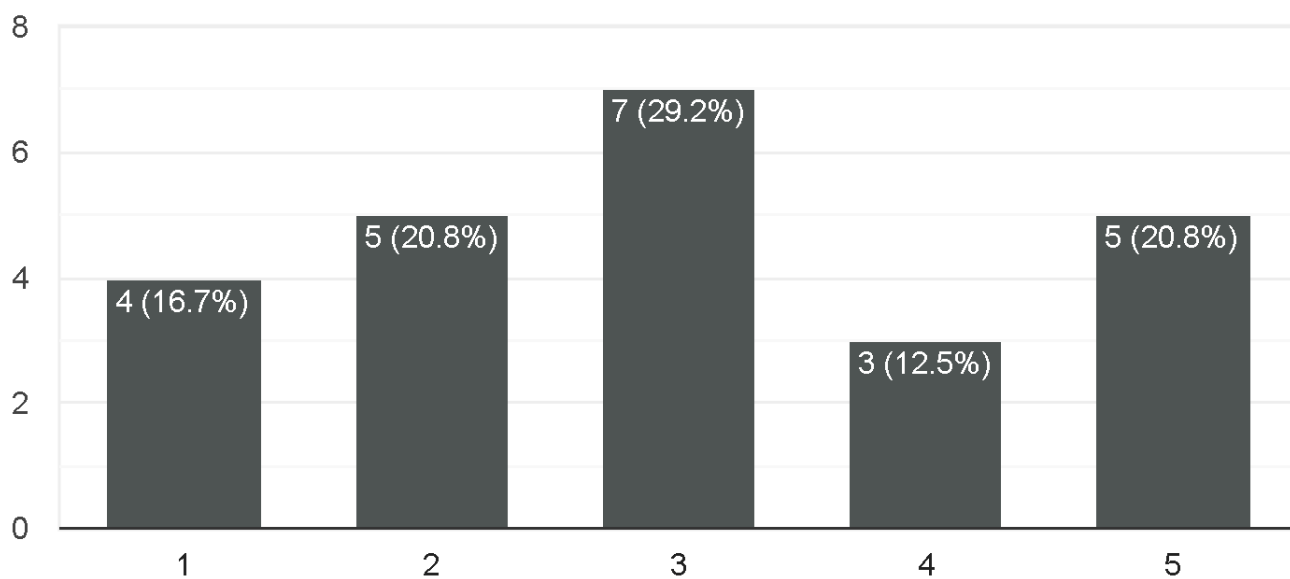
Q14. Are there opportunities for minorities and low-income individuals to engage in community planning?

24 responses



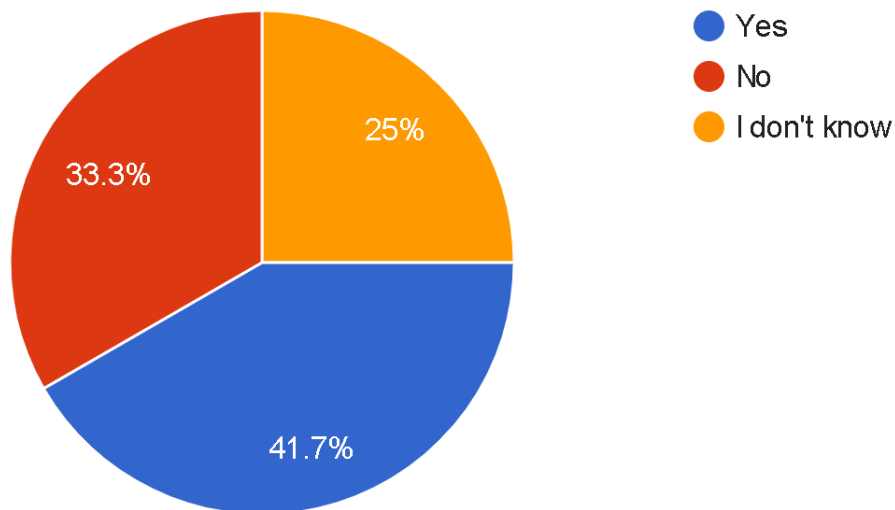
Q15. How well does your community invest in healthy, safe and walkable communities?

24 responses



Q16. Do the municipalities within your county promote the restoration of their downtown areas?

24 responses



Q17. If you answered yes to the previous question, please list the town and give examples.

24 responses

N/A

White cloud, restoration of downtown buildings
falls city with uptown area

No

I don't know

It says "If you answered yes to the previous question, please list the town and give examples." but I did not answer yes. But it also won't let you go to the next page without typing something in.

Falls City redoing downtown streets

Leona

Roads

White Cloud supports restoration, but the town is very poor.

n/a

NA

Just received a downtown revitalization grant a few years ago to redo the downtown area

Kansas City Mo , Parkville and Gladstone

Hiawatha. Restoring historic downtown

Always fixing up the downtown area, all the old buildings have businesses in them! They redid the sidewalks downtown for shoppers and tourists.

trying but town is full of derelict buildings

Hosting festivals/rodeos plus shop local events

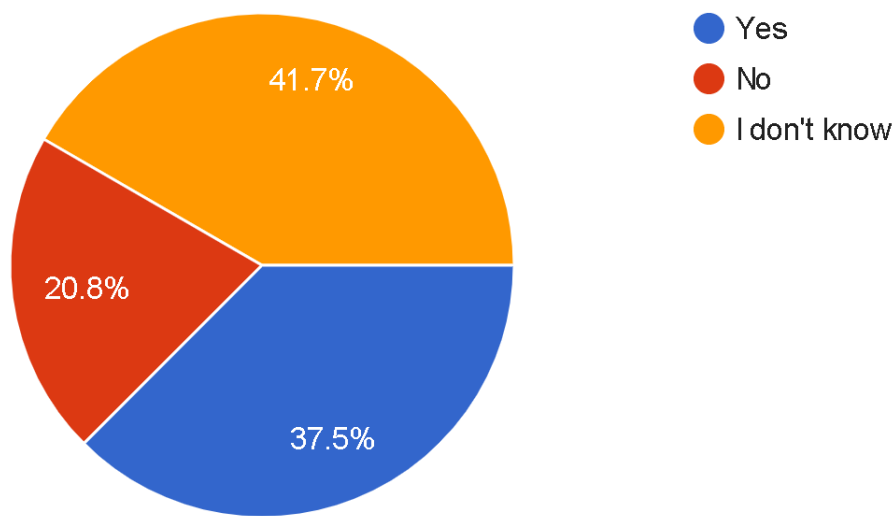
Cigarette butt disposal posts

White Cloud has nothing 4 the visitors that come threw the city of white cloud

N/A

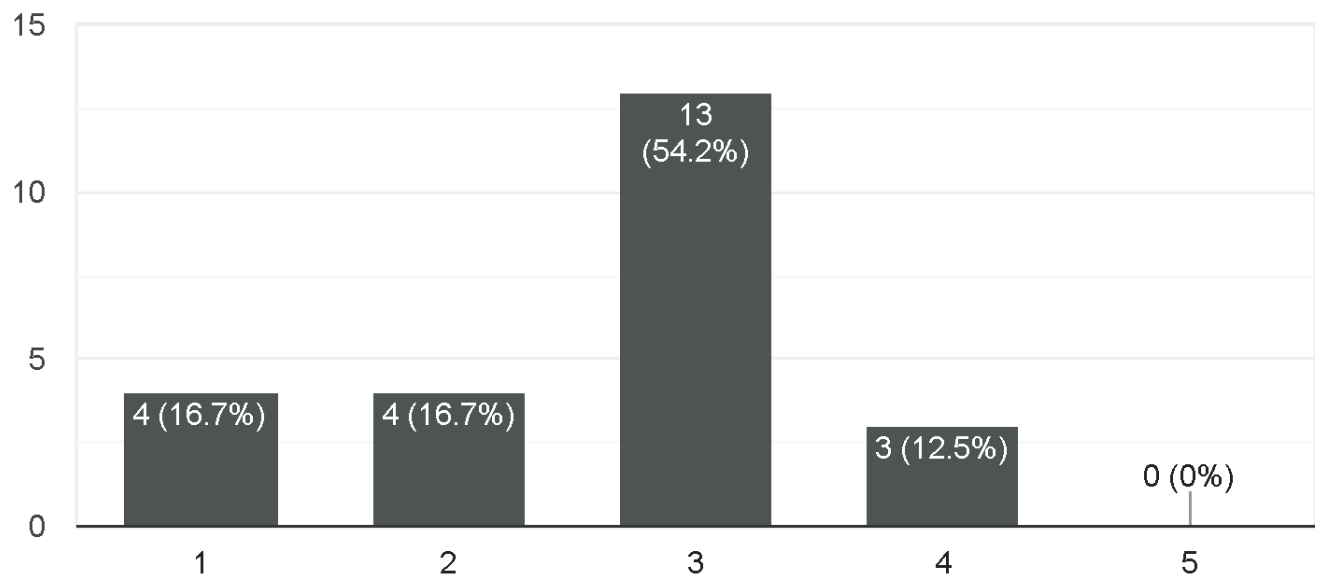
Q18. Does your community have the resources to develop a skilled workforce?

24 responses



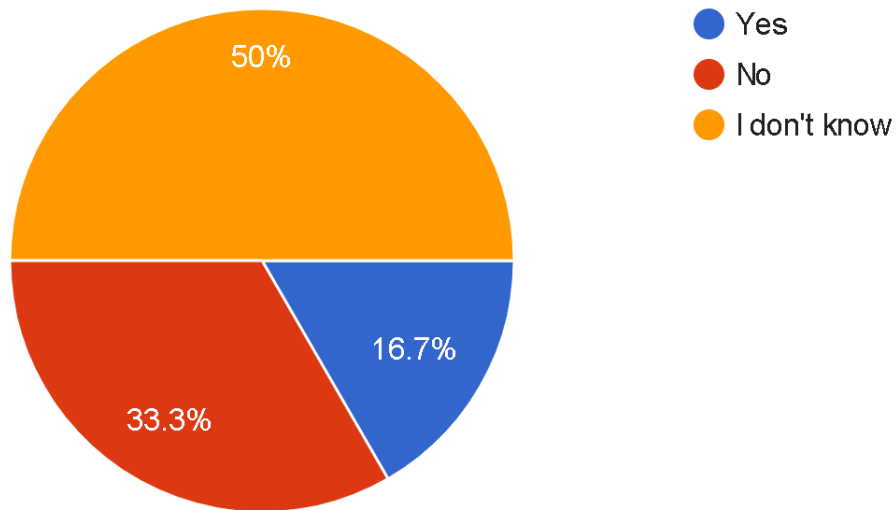
Q19. How well does your community work to maintain a skilled workforce?

24 responses



Q20. Do you believe there are gaps in educational resources?
(Including K-12, Community College, University, etc.)

24 responses



Q21. If you answered yes to the previous question, please specify.

24 responses

N/A

I don't know

NA

?

small amount

No

There are gaps, but it is a remote location

unsure

I don't know

Need more capable trades such as electricians, carpenters

n/a

Na

None

no many governmental entities focus on electing relatives

I answered no

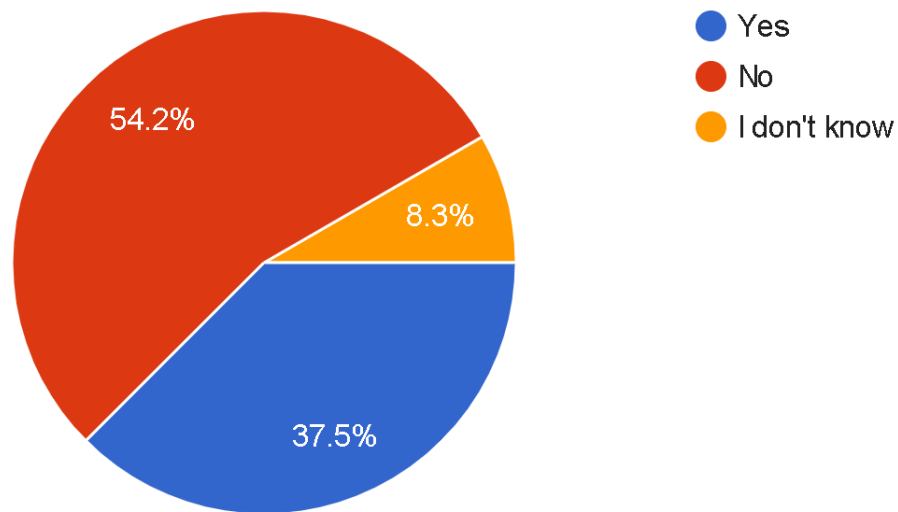
Not familiar with colleges in the area

I don't know the answer 2 that,,

Dual enrollment opportunities, virtual learning, access to higher education especially for people with pre-existing conditions.

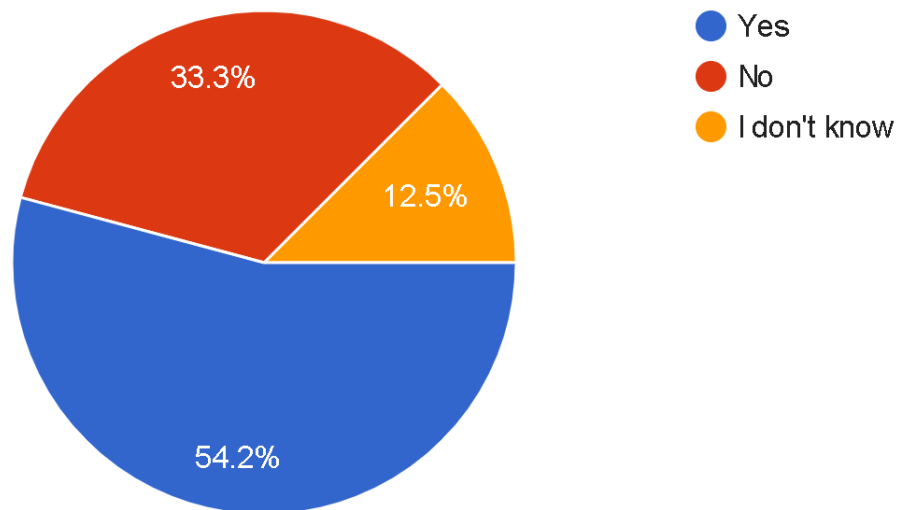
Q22. Does your local government encourage small businesses to locate and grow in your community?

24 responses



Q23. Do you believe your community has gaps in its healthcare services?

24 responses



Q24. If you answered yes to the previous question, please specify.

24 responses

Dental

N/A

no

Don't pay bills for patients

Hospital bought out all the private practices, decline in patient care. ER is TERRIBLE.

I don't think it does

nontribal spouses

Unknown

unknown

I don't know

I answered NO

Need more access to skilled doctors

NA

Na

Too many uninsured

Walk in clinics

They no longer allow women to have babies at Community Medical Center. Very odd.

lots of PA and not MD

Need more training for young mothers on nutrition

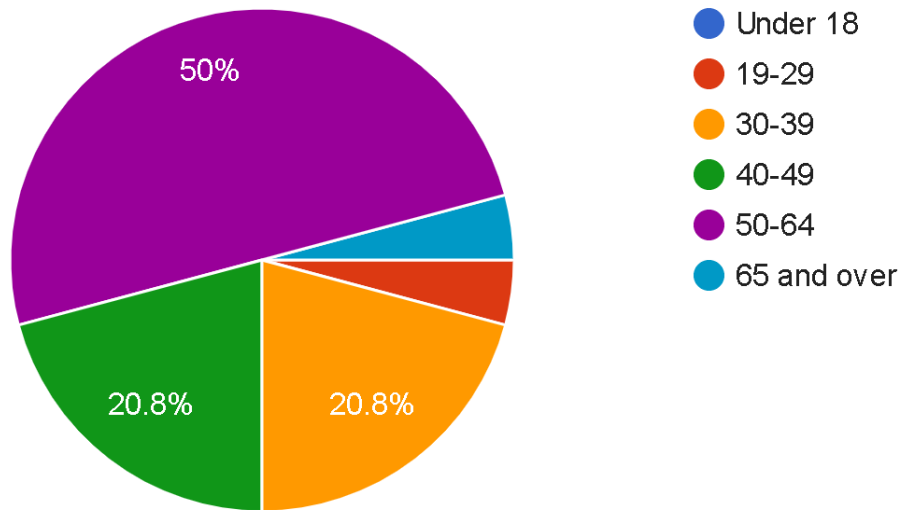
Issues anywhere with healthcare

I don't know the answer

Can't get adequate specialty care for the disabled, nursing homes, HUD housing, and block grant funding for multi-family private homes.

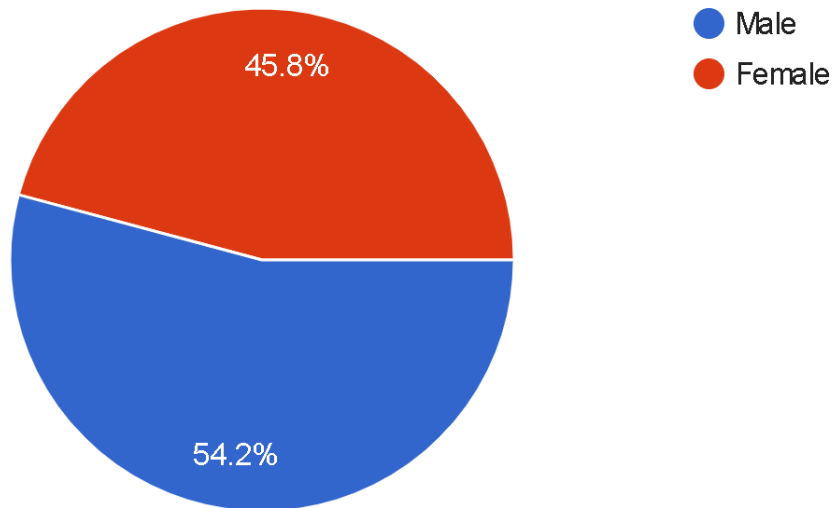
Q25. Please select your age range:

24 responses



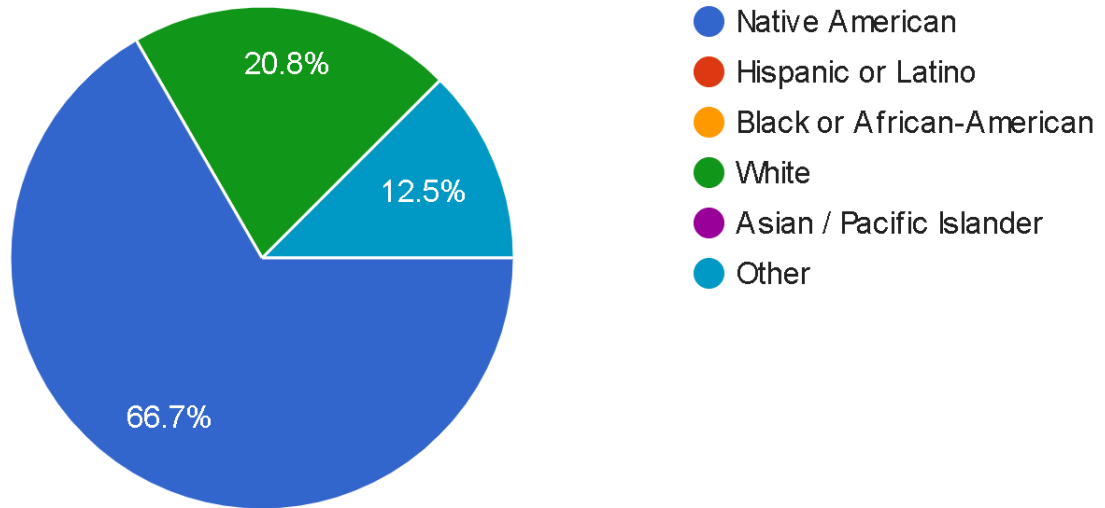
Q26. Please specify your gender:

24 responses



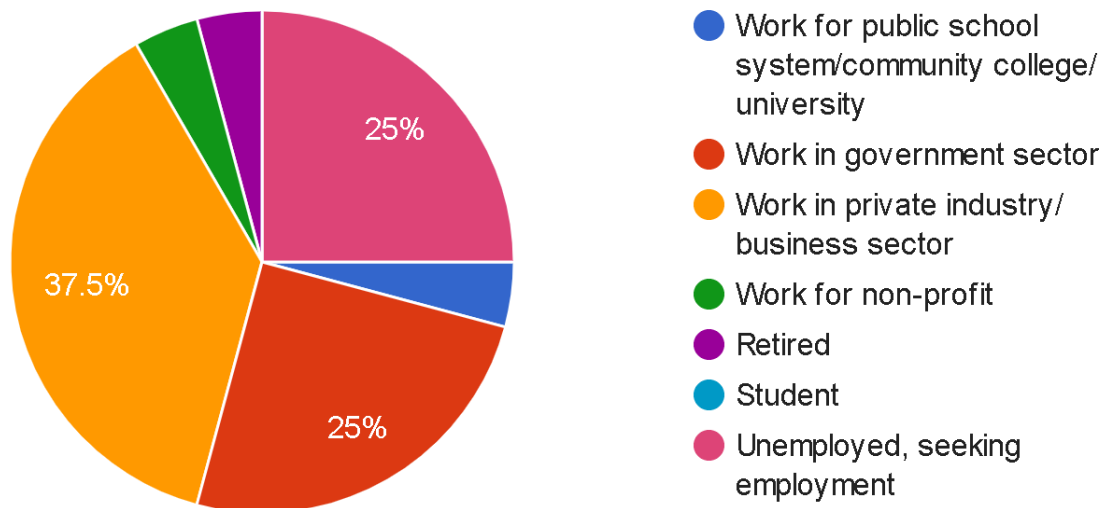
Q27. Please specify your race:

24 responses



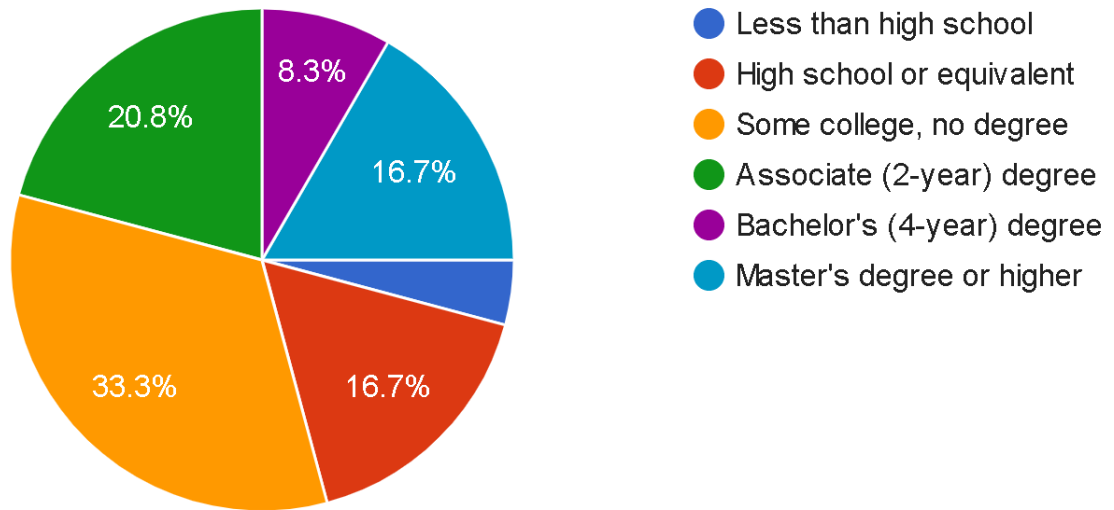
Q28. What is your employment status?

24 responses



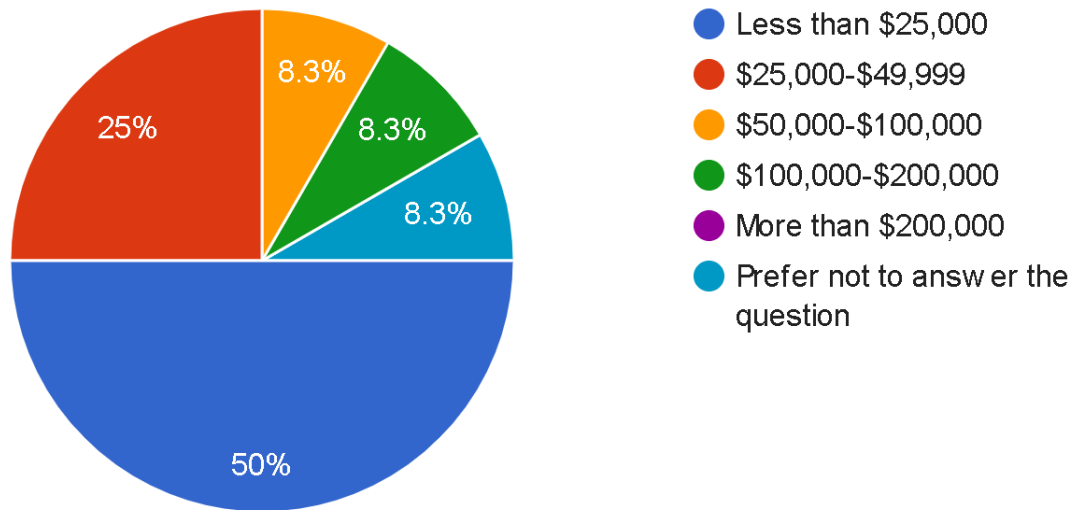
Q29. Please indicate your educational attainment level:

24 responses



Q30. What were your individual (not household) earnings in 2016?

24 responses



Q31. Do you have any other thoughts about the region's economic competitiveness that you would like to share with us?

24 responses

No

We have amazing crop land,let's use that to our advantage

N/A

no

Move to a city where they pay more. Wages are awful out here.

Need decent food resources, reservation is currently in a food desert.

lots

no

Could have such a great community if we worked together.

Need more local small stores

NA

They need more employment opportunities for people around here.

none

We have to entice business to relocate to us. Operational workforce is our best asset along with modern infrastructure in development of the community.

Public transportation improvement

We can strive to always be better.

Appendix B: List of Questions from EDA Environmental Guidance for Grant Programs, in accordance with the National Environmental Policy Act.

1. Are there any designated State or National Parks, or National Wildlife Refuges?

The Leary Site, declared a National Historic Landmark in 1964, lies on the ITKN Reservation. Additionally, the Lewis and Clark National Historic Trail passes through the reservation and is overseen by the National Park Service.

2. Does the area being reviewed include any designated or proposed wilderness areas under the Wilderness Act (16 U.S.C. § 1131 et seq)?

There are no designated or proposed wilderness areas within ITKN lands.

3. Are there any under the Wild and Scenic Rivers Act (16 U.S.C. § 1271 et seq.)?

There are no wild or scenic rivers within ITKN lands.

4. List any endangered or threatened species under the Endangered Species Act of 1973 ((16 U.S.C. § 1531 et seq.) (plants, animals, or critical habitat)?

The ITKN reservation is home to a large number of endangered and threatened species, as follows:

Western Prairie Fringed Orchid (*Platanthera praeclara*)

Blowout Penstemon (*Penstemon haydenii*)

American Burying Beetle (*Nicrophorus americanus*)

Salt Creek Tiger Beetle (*Cicindela nevadica lincolniana*)

*Pallid Sturgeon (*Scaphirhynchus albus*)

*Topeka Shiner (*Notropis topeka*)

Whooping Crane (*Grus americana*)

Interior Least Tern (*Sternula antillarum athalassos*)

Piping Plover (*Charadrius melodus*)

The ITKN also contains designated species of concern:

Saltwort (*Salicornia rubra*)

*American Ginseng (*Panax quinquefolium*)

Small White Lady's Slipper (*Cypripedium candidum*)

Lake Sturgeon (*Acipenser fulvescens*)

Sturgeon Chub (*Macrhybopsis gelida*)

Finescale Dace (*Phoxinus neogaeus*)

Northern Redbelly Dace (*Phoxinus eos*)

Massasauga (*Sistrurus catenatus*)

River Otter (*Lutra canadensis*)

Southern Flying Squirrel (*Glaucomys volans*)

Swift Fox (*Vulpes velox*)

Finally, the entire bluffs area including Rulo Bluffs, has been designated by the state of Nebraska as a BUL, Biologically Unique Landscape. There are other species of concern in this area as designated by the state of Nebraska in addition to those listed above.

5. List any “prime/unique agricultural lands” designated by the U.S. Dept. of Agriculture under the Farmland Protection Policy Act (7 U.S.C. §§ 4201 – 4209)?

There are no prime/unique agricultural lands on the ITKN reservation.

6. Are there any Superfund, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. S.C. § 9601 et seq)), Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6901), leaking underground storage tanks, or brownfield (abandoned, contaminated) sites in the area?

There are no Superfund, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. S.C. § 9601 et seq)), Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6901), leaking underground storage tanks, or brownfield (abandoned, contaminated) sites in the area.

7. Are there any hazardous chemical manufacturers or users or any facilities that store hazardous chemicals?

There are no hazardous chemical manufacturers or users or any facilities that store hazardous chemicals on ITKN lands.

8. Are there any major manufacturers or users of pesticides?

There are no major manufacturers or users of pesticides on ITKN lands.

9. Have all sole source aquifers for drinking water in the project area been identified?

The ITKN has on file a Comprehensive Water Resources Management Plan (CWRMP Reconnaissance Report prepared by Natural Resources Consulting Engineers, Inc. This report, created in June of 2013, provides detailed information on water resources on and into ITKN lands. In regards to aquifers in particular, aquifers, aquifer properties, glacial drift aquifer groundwater availability, alluvial aquifer groundwater availability, and bedrock aquifer availability were enumerated. Included in this report was also a ground-water quality report, presented using EPA guidelines for constituent concentrations.

10. Identify any wellhead protection areas for protecting drinking water in groundwater wells?

In December of 2019, a Non-Agricultural Water Planning Report was prepared by Natural Resources Consulting Engineers, Inc. This report details water resources on the ITKN lands including a map identifying the domestic water layout (below)

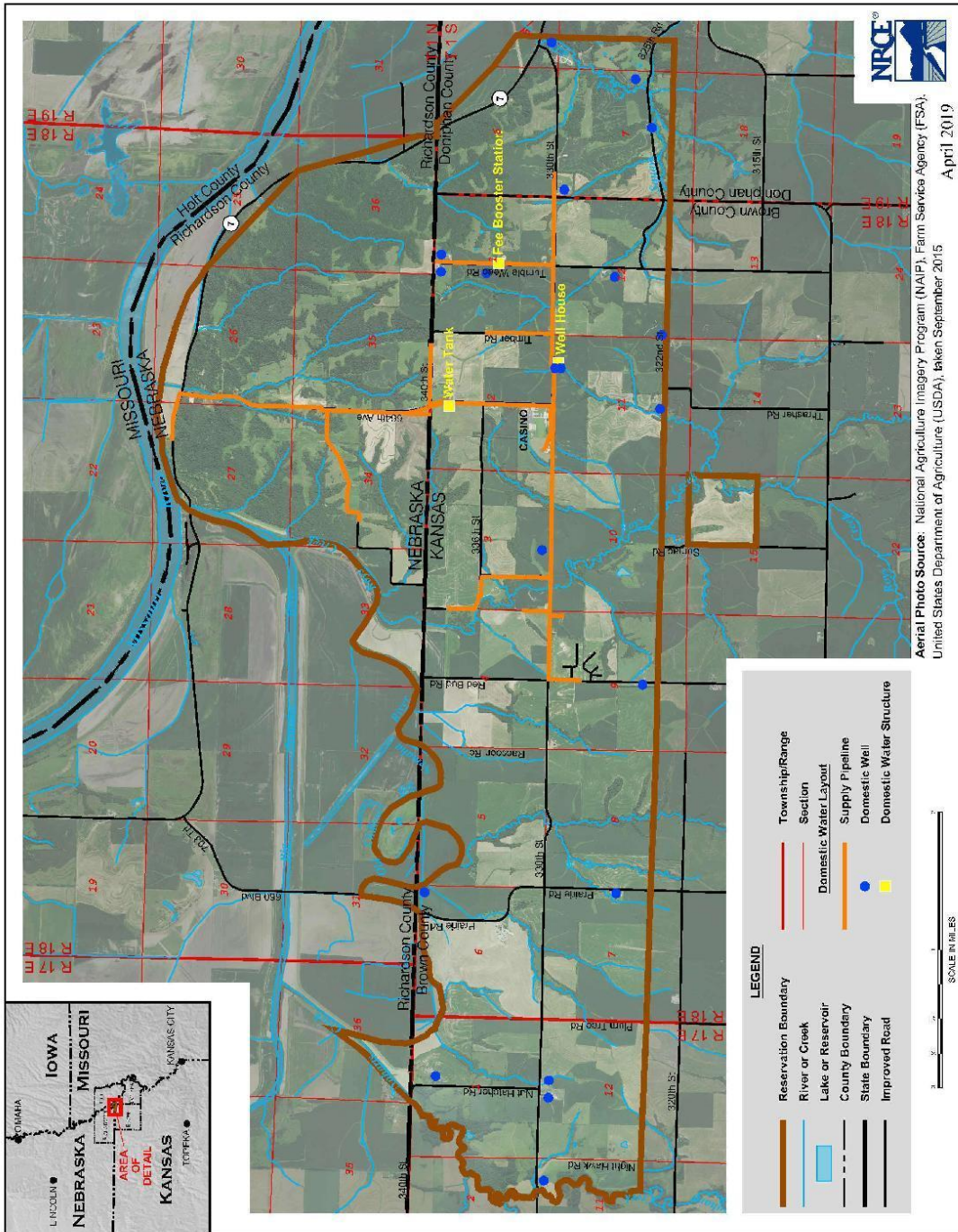


Figure 1: Domestic Water Infrastructure and Supply on the Iowa Indian Reservation, KS/NE

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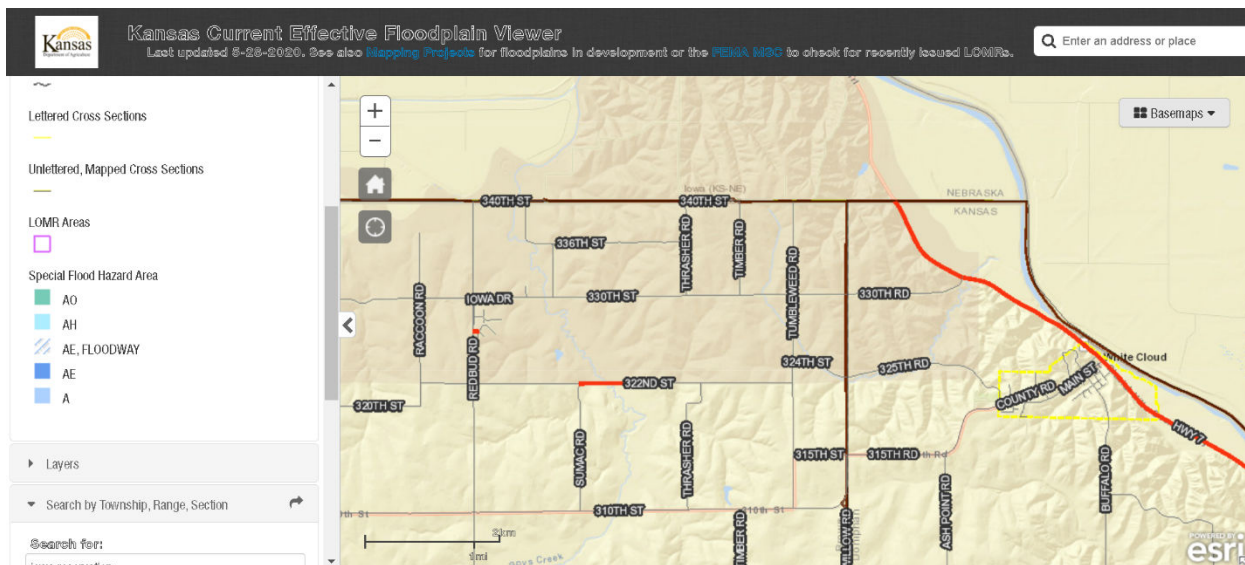
11. Are there any Nonattainment Areas for criteria pollutants under the Clean Air Act (42 U.S.C. § 7401 et seq)? If so, how will this affect future development in your area?

There are no Nonattainment Areas for criteria pollutants on ITKN lands.

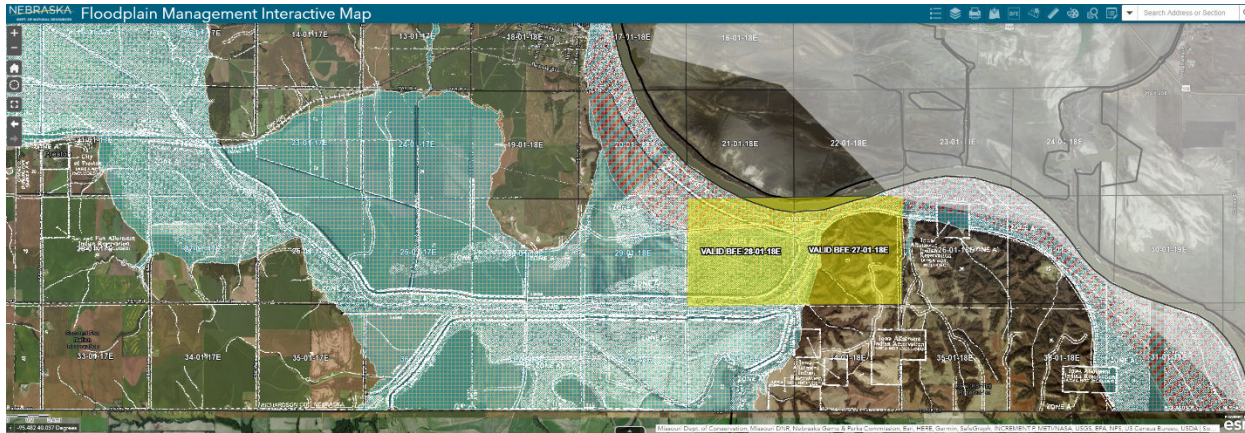
12. Identify any significant 100-year flood plains in your area? How will future development affect these areas?

Floodplain maps for both the Kansas and Nebraska portions of the ITKN Reservation have been gathered (see figure below). In addition, Roy's Creek, on ITKN lands, tends to flood when there is heavy rainfall, but that usually would infiltrate into the soil were it not for all the bare fields and removal of the riparian (creekside) trees and vegetation buffer areas.

Planned development is not expected to impact these areas.



Source: Kansas Department of Agriculture



Source: Nebraska Department of Natural Resources

13. Are there any known archeological, historic, prehistoric, or cultural resource sites that could function as a major constraint to any proposed economic development project and therefore should be avoided? Identify any known constraints to development as a result of these resources.

There are many known sites on ITKN lands. The Leary Site, mentioned above, is the best known, but many archaeological sites, including the Bluffs area are known locations of precontact burials. Specifics on site locations and pertinent details are not disclosed per professional practices and legal requirements, due to collectors looking for such information.

14. Is this area in a designated Coastal Zone area with a federally approved Coastal Zone Management (CZM) Plan in accord with the Coastal Zone Management Act of 1972 (16 U.S.C. § 1451 et seq.)? If so, is this CEDES consistent with the CZM?

As an inland area, this question does not apply.

15. To the extent practicable, does the CEDES identify the obvious constraints to economic development such as lack of public utilities or other infrastructure, indicate an estimate of the local schedule for eliminating such constraints, and discuss current and potential public controversies that may hinder development in the region?

Yes, the CEDS document describes all of these elements.

16. Are the social impacts with respect to environmental justice issues included in accordance with Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” (59 Fed. Reg. 7629, February 11, 1994)? How will proposed development adversely affect minority and low-income populations in the region?

The proposed development has the possibility of adverse impacts. For example, economic development improvements will result in higher property valuations which lead to higher property taxes. Those will unduly impact minority (tribal) and low-income populations in the region. Additionally, economic development will lead to higher use and impact on such infrastructure as roads, water and power, traffic and law enforcement, etc. These are all Environmental Justice issues. These do not necessarily stop economic development, but they must be acknowledged and planned for, per legal requirements.