



White Earth Nation, Naytahwaush Community Shared Use Pathway



FY 2024 Safe Streets and Roads for All (SS4A)

Project Type: Implementation Grant

FY 2024 Funds Requested: \$1,182,873

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www.srfconsulting.com/white-earth-nation-ss4a/

White Earth Nation, Naytahwaush Community Shared Use Pathway

2024 Safe Streets and Roads for All (SS4A) Funding Opportunity

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I. Overview

White Earth Nation is requesting \$1,182,873 in FY 2026 implementation funds to plan, design, and construct a lighted pedestrian pathway in the community of Naytahwaush. The Naytahwaush Community Shared Used Pathway (Project) would connect residents to Tribal government offices, healthcare services, and other destinations within and around Naytahwaush. If successful in securing Safe Streets and Roadways for All (SS4A) funding, White Earth Nation will use awarded funds to hire a professional transportation engineer/design firm to:



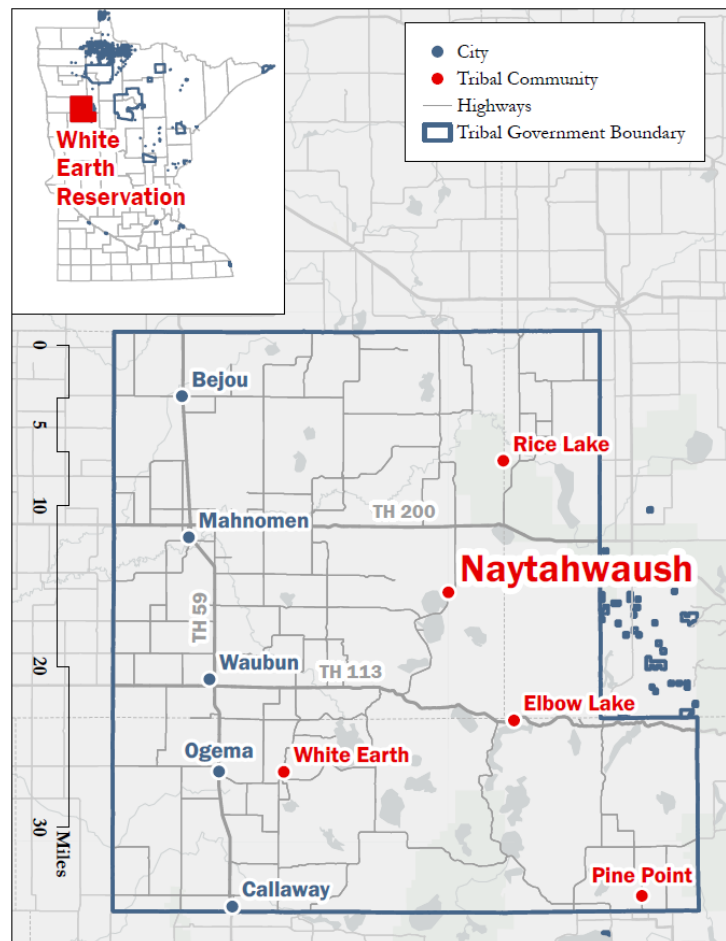
- Achieve environmental clearance in accordance with the National Environmental Policy Act (NEPA) requirements for the shared use pathway
- Develop preliminary and final design of the shared use pathway
- Construct the shared use pathway

The Naytahwaush Community Shared Use Pathway is a high-priority project that is identified in White Earth Nation's Tribal Transportation Safety Plan (Action Plan). The Project is included in White Earth's 2024-2027 Tribal Transportation Improvement Program (TTP). The Project adds to a multi-phased Safe Routes to School plan that addresses the pedestrian safety (lighting, sidewalks and road diet) throughout the community of Naytahwaush and will protect pedestrians, bicyclists, and other micromobility users who travel from all areas of the community to and from the Sports Complex, Workforce Center, Supportive Housing complex, and Indian Health Service Clinic.

Because White Earth Nation's internal funding capacity is limited, [Tribal Leadership](#) desires to address the lack of pedestrian facilities within White Earth Reservation's Tribal communities by pursuing state and federal funding opportunities. The Tribe understands that its funding request is lower than the expected

\$2.5 million award minimum for implementation projects expressed by the Department of Transportation (USDOT) in the Notice of Funding Opportunity (NOFO). White Earth Nation considered bundling projects for multiple facilities in this SS4A program funding request. However, the Tribe does

Figure 1. White Earth Reservation



not currently have sufficient funding to provide the required local match for a higher funding request. The Tribe is applying for what it can commit local match towards.

White Earth Nation's TTP receives funds to address the tribal roadway network through the Federal-Aid Highway Program, which is jointly administered by the Bureau of Indian Affairs (BIA) and the Federal Highway Administration (FHWA). Funds are broken down into five-year plans to improve the Reservation transportation network. Within White Earth Nation's TTP, a Transportation Improvement Plan (TIP) is prepared that identifies projects over a five-year period in which funds provided to White Earth Nation are distributed.

White Earth Reservation

Located in rural northwestern Minnesota, the White Earth Reservation encompasses about 1,300 square miles. **(Figure 1)** White Earth Nation Tribal lands overlap with three counties, including all of Mahnomen County and portions of Becker and Clearwater Counties. Five Tribal communities are dispersed throughout the Reservation (Elbow Lake, Naytahwaush, Pine Point, Rice Lake, and White Earth). In addition, five small cities are located along US Highway 59 (Bejou, Callaway, Mahnomen, Ogema, and Waubun).

Tribal Transportation Safety Plan

According to the Minnesota Department of Transportation's (MnDOT) [crash database](#), 11 fatal crashes and 42 serious-injury crashes occurred within Reservation boundaries from 2017-2021. White Earth Nation Tribal Leadership recognizes that all traffic-related deaths and injuries are preventable. In February 2024, White Earth Nation adopted its first Comprehensive [Tribal Transportation Safety Plan](#), the result of a collaborative effort with MnDOT and other stakeholders. This plan meets the requirements of the SS4A funding program and sets a goal of reducing and ultimately eliminating fatalities and serious injuries from vehicular crashes. The planning process combined a data-driven approach with extensive public engagement to thoroughly assess safety issues on the roadway network, identify risk factors and locations, and recommend transportation safety projects for implementation. The Tribal Transportation Safety Plan is a living document that identifies strategies and actions White Earth Nation and partner agencies will take to reduce serious crashes over the next decade, with a focus on safety, equity, and sustainability.

Micromobility and Pedestrian Facility Needs

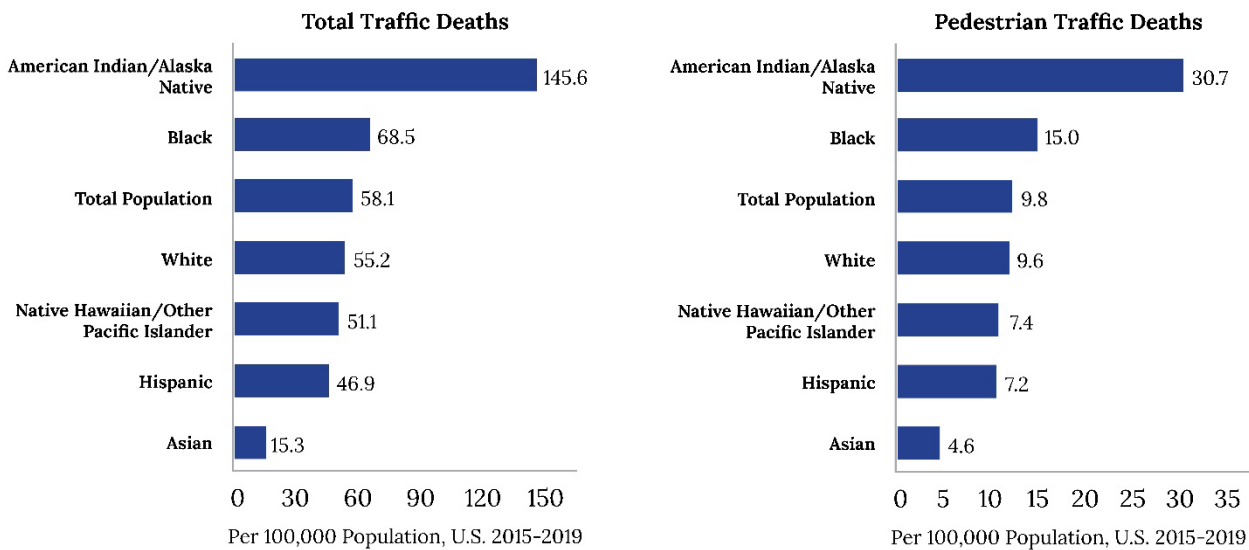
Reservation residents and visitors depend on a safe, reliable transportation system to access schools, work, health care, Tribal events, recreation opportunities, and other destinations. Walking and bicycling are primary travel modes for many residents, especially for short trips that have origins and destinations within Tribal communities. According to American Community Survey (ACS) five-year estimates for 2022, approximately 35 percent of households on the Reservation have zero or one vehicle. Furthermore, 25 percent of residents are under age 15 (Minnesota average 18.6 percent). **The Naytahwaush Community Shared Use Pathway is a low-cost, high-impact project that will separate pedestrians, bicyclists, and other micromobility travel modes from higher-speed motor vehicle traffic to reduce the risk of bicycle- and pedestrian-related crashes on the Reservation.**

Racial Disparities in Traffic Fatalities

American Indian/Alaska Native persons are disproportionately susceptible to serious crashes. **Compared to other demographics in the United States, Native persons are 2.5 times more likely to**

die in a crash, according to a 2021 study by the [Governors Highway Safety Association](#). Furthermore as shown in **Figure 2**, Native persons are about 3 times more likely to die in a pedestrian-related crash. Investing in transportation safety projects in Tribal communities helps reduce racial disparities and historical inequities.

Figure 2. Total Traffic Deaths and Pedestrian Traffic Deaths per 100,000 Population by Race



Source: Governors Highway Safety Association. (June 2021) *An Analysis of Traffic Fatalities by Race and Ethnicity*

Project Description

The Project will support construction of a 0.85-mile, eight-foot wide, asphalt, lighted shared use pathway in Naytahwaush. White Earth Nation will own and maintain the pathway. Most of the pathway will be built on White Earth Nation’s jurisdictional property with a short segment of the pathway running adjacent to Mahnomen County State Aid Highway (CSAH) 4 within the existing highway right-of-way. Mahnomen County supports the project and has provided a [letter of support for the Project](#).

Trail lighting is planned for the entire length of the shared use pathway. Lighting along the pathway will improve drivers' visibility of pedestrians and bicyclists in low-light conditions, especially at intersections or access drives with motor vehicle and pedestrian conflict points. Lighting along the pathway parallel to CSAH 4 will give drivers more time to identify and react to roadway hazards and avoid potential crashes. Adequate lighting will also enhance personal security for pedestrians, bicyclists, wheelchair users, and other users of the pathway.

According to [FHWA](#), lighting can reduce nighttime injury crashes by up to 42 percent at intersections. The lighting of intersections and segments is an FHWA [Proven Safety Countermeasure](#). Most new lighting installations are made with breakaway features, shielded, or placed far enough from the roadway to reduce the probability and/or severity of fixed-object crashes.

Safety Benefits:



Lighting can reduce up to:

42%

for nighttime injury pedestrian crashes at intersections

Source: FHWA

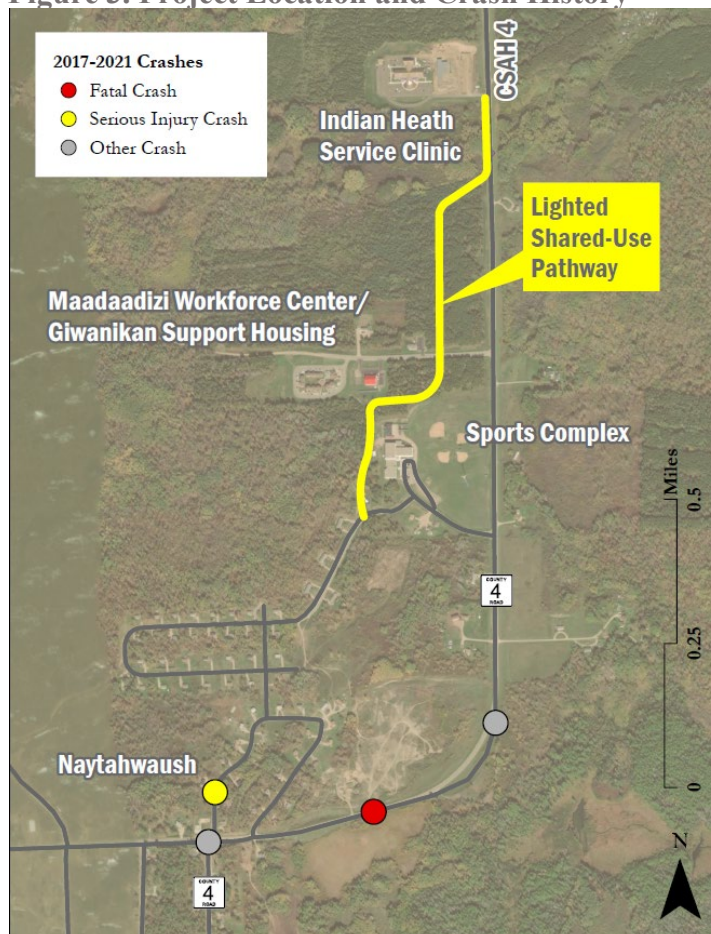
II. Location

The Project is within the White Earth Reservation in northwestern Minnesota. The Reservation's terrain varies from prairies to rolling hills. Naytahwaush is in the eastern half of the Reservation, which contains many lakes, wetlands, and forested areas. These characteristics shape the roadway network and impact travel safety. For example, the winding roadway network increases the potential for roadway departures and collisions with fixed objects along roadways, while thick forest cover reduces visibility and increases the risk of crashes with wildlife.

The White Earth Reservation is defined as a rural geography by the U.S. Census. There are no urbanized areas within the Reservation. The estimated population for White Earth Reservation and Off-Reservation Trust Lands is 9,877 (2022 ACS 5-Year Estimates). With a land area of 1,093 square miles, the average population density is about nine people per square mile.

Naytahwaush is one of five predominately Native American communities within the Reservation. Naytahwaush community members will be the primary beneficiaries of the Project. According to the 2020 U.S. Census, the population of Naytahwaush

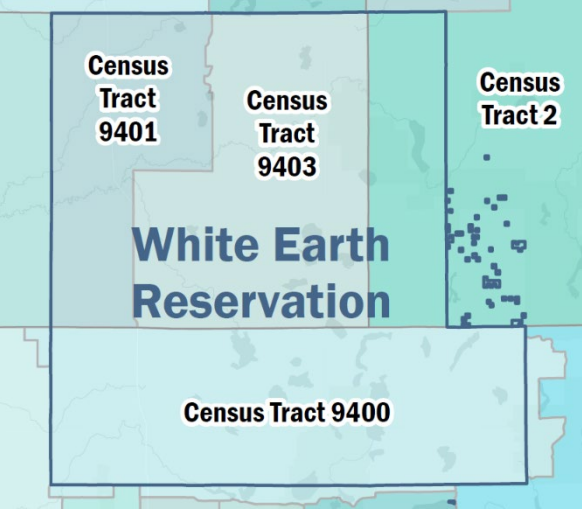
Figure 3. Project Location and Crash History



is 468. However, the actual population is likely higher – the Native American demographic is both Hard to Count (HTC) and a Historically Undercounted Population (HUP), [per U.S. Census definitions](#).

There are four Census Tracts within the Reservation: Census Tracts 9401 and 9403 in Mahnomen County, Census Tract 2 in Clearwater County, and Census Tract 9400 in Becker County. **(Figure 4).** All four Census Tracts are categorized as Disadvantaged Census Tracts according to [USDOT’s list](#) of Areas of Persistent Poverty (APP) and Historically Disadvantaged Communities (HDC), Census Tracts 9401, 9403, and 9400 are APPs and Census Tract 9400 is also an HDC. The Bipartisan Infrastructure Law (BIL) defines Areas of Persistent Poverty as areas with a poverty rate of 20 percent or more over the last three decades.

Figure 4. Census Tracts



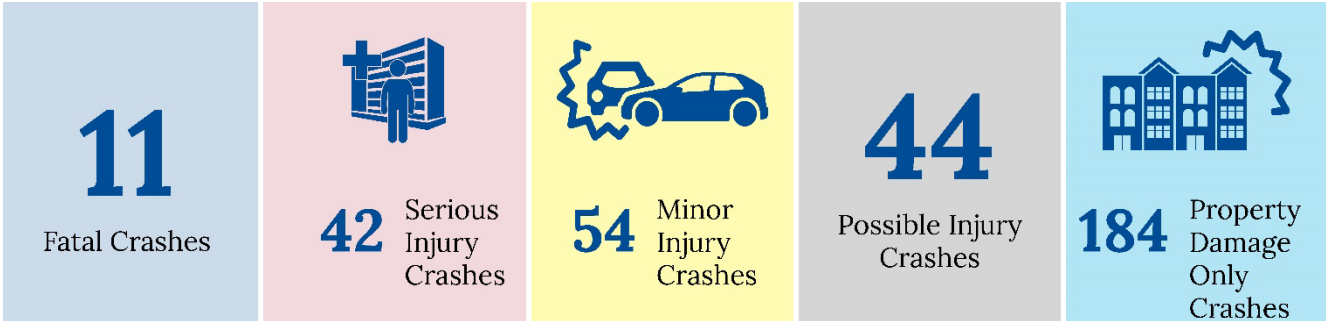
The Project is in Mahnomen County Census Tract 9403, an APP. According to the [Climate and Economic Justice Screening Tool \(CEJST\)](#), the White Earth Reservation is considered a disadvantaged community. Disadvantaged communities are identified as areas facing social and economic hardships. The USDOT defines all federally recognized Tribal lands as [disadvantaged communities](#).

III. Response to Selection Criteria

1. Safety Impact

1.1 Description of the Safety Problem

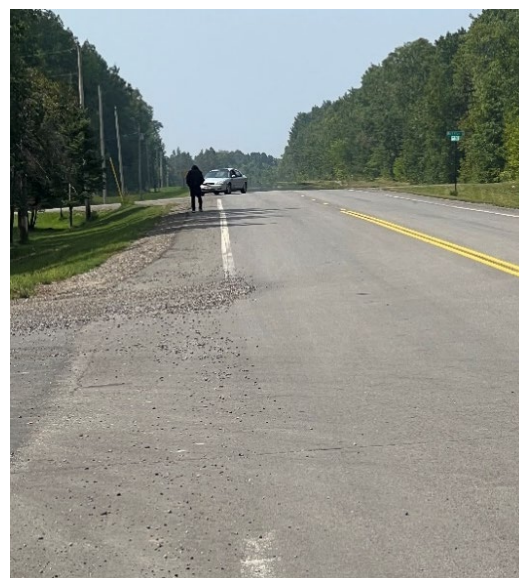
Over the five-year period from 2017-2021, 335 crashes were recorded on White Earth Reservation, with crash severity broken down as follows:



Source: MnDOT Crash Data 2017-2021

Five crashes occurred within one mile of the Project, including one fatal crash and one serious injury crash. The fatal crash occurred on a horizontal curve along CSAH 4, which is located about one-half mile south of the Sports Complex. In addition, 66 crashes were recorded Reservation-wide in 2022, two of which were fatal. 67 percent of severe crashes along the Tribal highway system involved a non-motorist (pedestrians and bicyclists)

The Project has been specifically selected to address pedestrian safety concerns in and around the Community of Naytahwaush. The Project [is described](#) in the Tribal Transportation Safety Plan under the heading “CSAH 4 Indian Health Center Clinic (Mahnomen County).” It is a high priority supported by White Earth Nation Tribal Transportation Program staff and community/working group input. The Tribal Transportation Safety Plan also prioritizes a future trail extension from the Project north to the existing separated pedestrian sidewalk on Minnesota Trunk Highway 200 (TH 200).



Pedestrian on CSAH 4 near Naytahwaush.

CSAH 4 is a rural undivided two-lane paved highway with 12-foot travel lanes and 2-foot shoulders. The highway is unlighted. The posted speed limit on CSAH 4 is 55 mph, dropping to 30 mph through Naytahwaush. Pedestrians and bicyclists utilizing the highway are fully exposed to high-speed vehicular traffic. Depending on the actual width and condition of the shoulders, bicyclists and other micromobility users may need to utilize the travel lane.

According to the [FHWA Bikeway Selection Guide](#), proximity to motor vehicle traffic is a significant source of stress and discomfort for bicyclists with crash and fatality risks [sharply rising](#) for vulnerable users when motor vehicle speeds exceed 25 mph. **Table 1** shows the risk of death and serious injury to pedestrians struck by vehicles at increasing impact speeds.

Table 1. Speed vs. Risk in Pedestrian-Involved Crashes

Risk of Serious Injury or Fatality	Pedestrian Impact Speed	
	Serious Injury	Fatality
10 percent	16 mph	23 mph
25 percent	23 mph	32 mph
50 percent	31 mph	42 mph
75 percent	39 mph	50 mph
90 percent	46 mph	58 mph

Source: Tefft, B.C. (2011) Impact Speed and a Pedestrian’s Risk of Severe Injury or Death.

Roadway departures involving a single vehicle are a [significant cause](#) of crashes on narrow, rural roadways. Drivers who encounter unexpected roadway hazards including pedestrians or bicyclists within the roadway, have limited space to maneuver while retaining control of their vehicle. The Project will separate motorized traffic from non-motorized traffic, reducing safety hazards for all travel modes.

1.2 Safety Impact Assessment

White Earth Nation has made highway and pedestrian safety a clear priority in transportation investment decision making. The White Earth Tribal Transportation Safety Plan took a systemic, data-driven approach to risk assessment, which emphasized the proactive identification of safety concerns. In addition to analyzing historical crash data, this approach analyzed roadway system characteristics that increase safety risks. This approach enabled the efficient identification of safety issues on White Earth Nation's entire roadway inventory and assigned appropriate safety strategies to roadway segments, curves, and intersections. This approach is preventative, allowing for safety strategies to be identified and implemented before a crash occurs.

Segments, intersections, and curves were scored and prioritized using six risk factors:

- ADT Range
- Access Density
- Lane Departure Crash Density
- Critical Radius Curve Density
- Edge Risk Assessment
- Shoulder Width

Locations with three or more risk factors were identified as priority areas to address transportation safety on the Reservation. CSAH 4 through Naytahwaush met the criteria for ADT range, access density, and shoulder width. The Project is a low-cost, evidence-based countermeasure to reduce the long-term risk of fatal and serious injury crashes on CSAH 4. **Table 2** summarizes the findings from the safety impact assessment.

Table 2. Risk Assessment for Curves, Segments, and Intersections

Feature Type	Number Analyzed	Number of High-Priority Locations	Percent of Total High Priority Locations
Segments	295	54	15.9%
Curves	412	233	68.7%
Intersections	271	52	15.3%
Total	978	339	100.0%

The Project will enhance the safety of the community as pedestrians and bicyclists will be redirected from traveling along the existing roadway shoulder of CSAH 4. The shared use pathway will provide a direct connection for residents traveling between the community of Naytahwaush, the Naytahwaush Sports Complex, the Maadaadizi Workforce Center, Giwanikan Support Housing, and the Indian Health Service Clinic. The pathway will decrease the chances of a motor vehicle/pedestrian crash by eliminating the need to walk or bike on the shoulder of CSAH 4. Many residents of Naytahwaush have limited access to vehicles and will rely on the trail for safe daily travel.

1.3 Implementation Costs

The total itemized cost of the project, including capital costs for pedestrian infrastructure and operational safety improvements, is \$1,478,591 as shown [here](#). This includes \$1,182,873 in federal cost share (80 percent) requested through this application, and \$295,718 in local cost match (20 percent). Total Project cost is inflated by four percent annually, to the mid-point of construction or 2026. A 15 percent contingency is included to accommodate any unforeseeable circumstances that may impact the budget. The Tribe is [committed](#) to providing the local match to deliver the project.

2. Equity, Engagement, and Collaboration

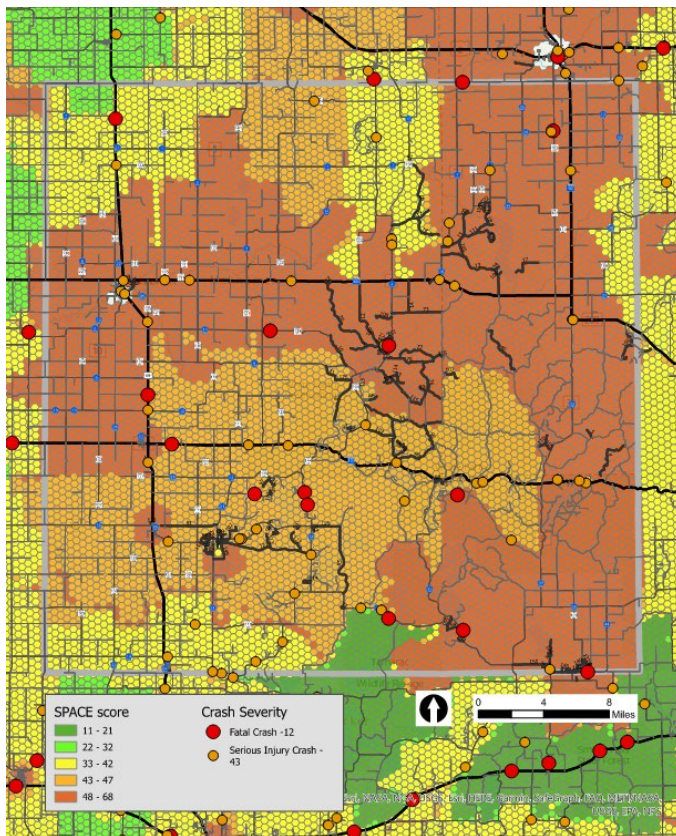
2.1 Equity

White Earth Nation understands the need for equitable planning and the impacts of project selection and design on all populations, including underserved and underrepresented populations. The findings and recommendations outlined within the White Earth Tribal Transportation Safety Plan, and the selection of the shared use pathway as a top priority, represent the culmination of planning and engagement efforts performed as part of several planning initiatives in recent years, including the [Naytahwaush Safe Routes to School \(SRTS\) Plan](#), the [White Earth Long-Range Transportation Plan \(LRTP\)](#), and the [White Earth Tribal Transportation Safety Plan](#).

The project will provide immediate safety and recreational benefits to Minnesotans living in an APP and a [disadvantaged community](#). In practical terms, these socioeconomic classifications mean that residents of White Earth Reservation and within the Project area – which includes mostly minority persons – have lower levels of access to facilities, funding, economic opportunity, and social mobility than most Americans. As shown in **Figure 2**, the chances of severe injury or death from a crash are substantially greater for Native Americans. The rate of pedestrian injury to Native American residents in vehicular collisions is more than three times greater than that of the general population and cyclist injury rate is about 60 percent higher.

Thirty-five (35) percent of households on White Earth Reservation have zero or one vehicle, despite living on a large, rural Reservation with spread-out communities. For many residents, walking or bicycling is a regular travel mode. Yet, the poor quality of bicycle and pedestrian facilities, combined with existing gaps in community pathway networks, may discourage residents walking or bicycling – when they have a choice – or force them to use facilities that are designed exclusively for motor vehicle traffic. The lack of safe, reliable bicycle and pedestrian facilities for those who need them the most is a glaring equity issue.

Figure 5. White Earth Reservation SPACE Scores



The need for this Project is perhaps best demonstrated by MnDOT’s [Priority Areas for Walking \(PAWS\) tool](#). This tool maps priority pedestrian areas throughout Minnesota using half-mile hexagons to visualize needs at the neighborhood level (**Figure 5**). Each hexagon is scored based on several factors, including equity, safety, health, infrastructure, and land use. Hexagons are prioritized in five tiers, with Tier 1 indicating the highest priority. The highest scoring hexagons statewide received a score of 16. Within the project area, all hexagons are within Tier 1 (red) and Tier 2 (orange), with the equity tool scoring maximum points, indicating the need for shared use paths, trails, sidewalks, and safe crossing accommodations at trail access points and intersections.

Equity is not just about which persons benefit from a project and which do not – it is also about ensuring that communities and neighborhoods have access to the infrastructure and services

that are right for them. The demand for active transportation infrastructure on White Earth Reservation is clearly demonstrated using MnDOT’s [Sustainability for Pedestrian and Cycling Environment \(SPACE\) tool](#). This tool uses 19 flags related to social and transportation conditions that indicate the suitability for active transportation infrastructure. The areas in and around the Project score 53 out of 100, meaning 10 of the 19 flags were triggered. The shared use pathway will greatly enhance facilities for active transportation users. Both the PAWS tool and the SPACE tool showcase the clear need for complete street infrastructure within Naytahwaush and throughout the Reservation.

Finally, as part of the Tribal Transportation Safety Plan, White Earth Nation conducted an [equity analysis](#) to understand the disproportionate levels of traffic fatalities and serious injuries to underserved populations. The analysis used data from MnDOT that shows significant racial and ethnic disparities in both the rates of severe injury and death across all forms of transportation. By constructing a pathway, users of all ages and abilities can experience better community connectivity, improve their health, and reduce their carbon footprint.

2.2 Engagement

The White Earth Tribal Transportation Safety Plan and Naytahwaush SRTS [Planning](#) and [Engineering](#) Studies were part of a larger effort to improve the transportation network and address equity goals. White Earth Nation hosted multiple public engagement events to gather feedback from underserved populations. The goal of hosting the events was to foster strong community engagement, identify transportation network safety concern locations, and improve public safety. In 2023, White Earth Nation staff attended three events to build trust with communities throughout the Reservation to better understand their needs as part of the Tribal Transportation Safety Plan.

Community input was gathered in a variety of ways, including a community-wide survey, which addressed safety concerns, crashes, avoidance areas, and respondent demographics. The public survey was developed to engage community members and gather input on the Reservation-wide transportation network. The survey was also provided in hard copy format at in-person public engagement events. A total of 110 responses were received from mid-May to mid-July, 2023. Key takeaways from the survey included:

The Project is supported by various stakeholders as documented through participation in the Tribal Transportation Safety Plan. White Earth Nation Tribal Leadership passed a resolution in May 2024 to

More than 50% of respondents avoid walking, biking, taking transit, or driving because of transportation safety concerns.

More than 80% of respondents drive as their main form of transportation around the reservation.

43% of respondents noted that they have been, or almost been, in a crash involving a vehicle, bicycle or pedestrian. The above-mentioned equity, engagement, and collaboration helped shape the list of high priority locations and strategies included in the Plan.

support the SS4A Program grant application. White Earth Nation has committed to reducing severe and fatal accidents through equitable investments in underserved communities. Moving forward, White Earth Nation proposes implementing, as part of the funding request, enhanced community outreach and engagement efforts to integrate equitable community feedback as a part of the decision-making process.

3. Effective Practices and Strategies

As explained in the Safety Impact Assessment, White Earth Nation used a data-driven systemic safety approach to identify high-risk locations. From there, low-cost, high-impact strategies were identified and recommended for each location. The Project includes two of FHWA's Proven Safety Countermeasures:

- Walkways (65-89 percent reduction in crashes involving pedestrians and bicyclists walking along roadways)
- Lighting (42 percent reduction in nighttime injury pedestrian crashes at intersections)

These countermeasures have proven effective to reduce fatal and serious injury crashes. White Earth Nation used Crash Modification Factors (CMF) and other published research to identify the expected crash reduction factors.

3.1 Alignment with the 2020-2024 Minnesota Strategic Highway Safety Plan (SHSP)

The [2020-2024 Minnesota Strategic Highway Safety Plan \(SHSP\)](#) identifies pedestrians as a safety emphasis focus on improving. SHSP key [strategies](#) identify the importance of building and lighting pedestrian facilities:

- Identify areas with inadequate pedestrian facilities that could be improved, including in rural areas or on Tribal lands.
- Improve lighting around pedestrian facilities to increase pedestrian visibility, including near transit stops and in rural areas.

3.2 Alignment with the Minnesota Vulnerable Road User Safety Assessment (VRUSA)

The Project is in direct alignment with findings and recommended strategies from the Minnesota Vulnerable Road User Safety Assessment (VRUSA). VRUSA key strategies include:

- Prioritize pedestrian scale lighting where people are expected to cross the street walking, biking, or rolling.
- Provide bicyclist and pedestrian facilities along trunk highways and arterials with a priority on separated biking and walking infrastructure.
- Focus interventions on minor arterials, especially safe crossings along and across trunk highways and arterials.
- Develop a plan that incorporates a hierarchy for maintenance activities on our transportation system (e.g. lighting, snow/ice, debris, etc.).

3.3 Alignment with National Roadway Safety Strategy Plan

All aspects of the Project will directly align with the U.S. Department of Transportation's National Roadway Safety Strategy Plan (NRSS). The Project will accomplish the following NRSS objective:

- **Safer Roads.** The separated shared use pathway in Naytahwaush will reduce the vulnerability of pedestrians and cyclists who utilize rural roadways for travel or recreation. [According to the Fatality Analysis Reporting System from the U.S. Census](#), fatal crashes occur disproportionately on rural roads, both per capita and by travel volumes. Road safety improvements can encourage safe behaviors among drivers and other road users. In addition to providing a new, safer route for non-motorists, the Project incorporates pathway lighting to further enhance user safety.

4. Other DOT Strategic Goals

4.1 Climate and Sustainability

Due to global warming, hydrologic patterns are shifting and causing more extreme climate events in the United States. **Native American tribes, including White Earth Nation, are uniquely vulnerable to climate change, in part due to the predominately rural portions of the country where they [reside](#).** With limited access to emergency resources, dealing with severe weather events can prove challenging to tribal members when trying to access vital goods and services.

Climate change is already impacting Minnesota's weather. The state is seeing increased precipitation, higher wind speeds, and heavier snow events. Daily average minimum temperatures during the winter (December to February) [have increased](#) 7.3 degrees from 1895 to 2021 in northern Minnesota. Warmer winters lead to larger and more frequent precipitation events, resulting in more snowfall [than ever before](#).

Heavy snow events, defined as calendar days with at least four inches of snow, have been increasing in frequency over time and annual rainfall has increased consistently since 1900. During the winter of 2022-2023, MnDOT District 4, where White Earth Reservation is located, experienced 92 inches of snowfall.

This Project will advance a sustainable and resilient transportation system and reduce greenhouse gas emissions. The Project will provide an alternative, low-maintenance transportation connection that improves access to critical facilities near Naytahwaush, including the Indian Health Service Clinic. Project benefits will make the community more resilient to future climate impacts. White Earth Nation plans to pay for electricity to light the pathway and provide maintenance throughout the life of the pathway, giving the Tribe greater control over community facilities and improving its ability to adapt to extreme weather events. The Project also will reduce the community's car-dependence, thereby reducing its carbon footprint, as single-occupancy vehicles are one of the greatest producers of carbon emissions in the transportation sector.

4.2 Economic Competitiveness

Indian Reservations such as White Earth are disproportionately affected by deficient infrastructure due to their rural and isolated locations and systemic, historical inequities. These communities often bear the brunt of deteriorating roadways and experience increased travel times, limited access to essential services, and higher rates of crashes and fatalities. This Project will improve economic competitiveness in an underserved community by improving connectivity and access to economic opportunities. **The Project will improve connections and reduce travel times to the Maadaadizi Workforce Center, Giwanikan Support Housing, and the Indian Health Service Clinic.**

Reliable transportation infrastructure attracts investment, which encourages business growth and creates job opportunities, particularly in areas with historically limited access to transportation networks. By prioritizing construction and maintenance activities that enhance the functionality and safety of the identified shared use pathway, White Earth Nation will be able to address longstanding disparities in infrastructure investment and promote equitable economic development. This targeted approach to infrastructure investment will improve access to goods and services and ensure that all residents can benefit from the economic opportunities and improved quality of life facilitated by well-maintained pedestrian/bicycle facilities.

4.3 Workforce

White Earth Nation believes it is extremely important to provide training and employment opportunities to White Earth tribal members and other Native Americans. As a result, White Earth Nation enacted the [Tribal Employment Rights Ordinance \(TERO\)](#) in 1984. TERO establishes hiring and employment preferences for Native Americans and military veterans. Companies that conduct business within the Reservation are required to hire a minimum number of Native Americans for each job classification and to cooperate with tribal training programs to hire a certain number of trainees. For construction of the shared use pathway, TERO requirements will ensure that Native Americans will receive workforce training and assist with project completion.

The shared use pathway will also establish a direct route between Tribal government facilities, health care, and residential communities to give the Naytahwaush-area workforce a safer, more convenient commuting option than walking along the shoulder of CSAH 4.

5. Supplemental Planning and Demonstration Activities

This application is requesting implementation funds. Therefore, this section of the NOFO does not apply to the Project.

IV. Project Readiness

White Earth Nation guarantees that all necessary activities will be completed within two years of grant execution. The Project will conform to all current USDOT, BIA, AASHTO, and MnDOT standards for design and ADA-compliant pedestrian infrastructure. To date, White Earth Nation has:

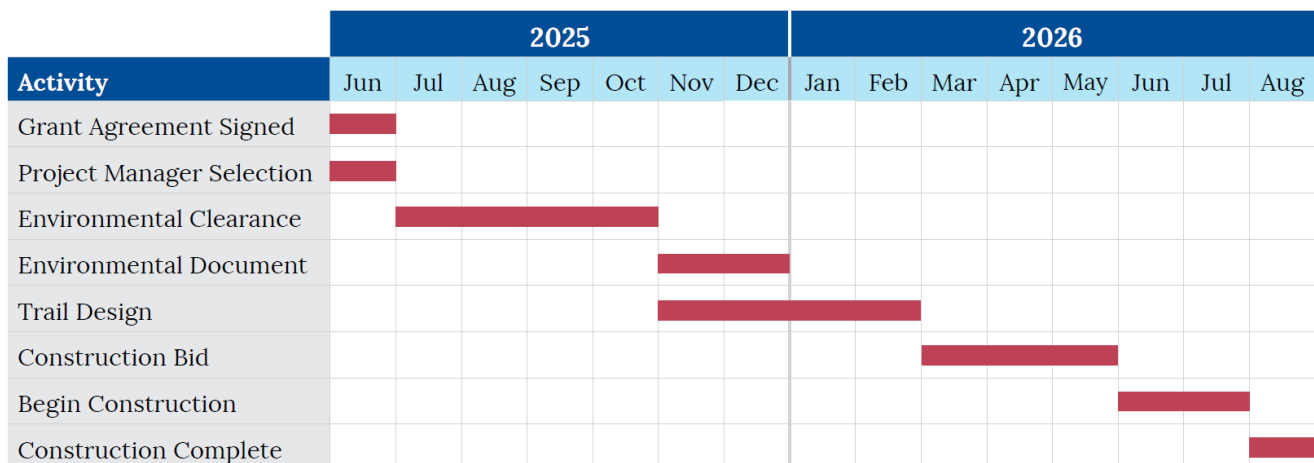
- [Committed to the 20 percent match](#) through White Earth Tribal Transportation Plan (TTP) funds
- Coordinated with BIA, MnDOT, Mahnomen County, White Earth Public Works Division, and Tribal Leadership
- Developed schematic design of the route of the trail through various planning efforts

White Earth Nation will hire BIA Engineering staff to develop preliminary and final design plans for the shared use pathway. By hiring the BIA, the Tribe will be able to keep design costs low, as the BIA cannot complete the work for profit. It is expected that environmental clearance will also be completed by the BIA. Hiring BIA to complete these tasks will accelerate the project timeline and accommodate White Earth Nation's procurement process for construction, which will require soliciting bids from multiple firms. The design work for the shared use pathway will be fully complete and out for bid by the Spring of 2026. The Project will be constructed during the 2026 construction season.

Most of the pathway will be constructed on White Earth Nation jurisdictional land with a short segment of the pathway lying within existing county highway right-of-way. White Earth Nation has support from Mahnomen County to construct the lighted pathway segment along CSAH 4. The Project will not require property acquisition. Mahnomen County [supports the Project](#) and agrees with White Earth Nation's plan for lighting expenses and maintenance.

The [Project schedule](#) sets a 15-month timeframe to complete the grant agreement, complete design of the shared use pathway, obtain environmental clearance, and construct the pathway. **(Figure 6)** White Earth Nation can be ready to begin the project earlier if needed.

Figure 6. Project Schedule



* Timeline assumes potential grant agreement of June 2025