IV.D. Narrative Information Sheet

1. Applicant Identification:
   Municipality of Las Piedras, Puerto Rico
   P.O. Box 68
   Las Piedras, P.R.
   00771787-733-2160

2. Funding Requested:
   a. Assessment Grant Type: Community-wide Assessment Grant
   b. Federal Funds Requested:
      i. $400,100
      ii. Indicate if you are requesting a waiver of the $200,000 limit (Site-
          specific Assessment Grant applicants only). N/A

3. Location:
   a. Municipality of Las Piedras
   b. Las Piedras
   c. Puerto Rico

4. Target Area and Priority Site/Property Information
   a. Target Area: Urban Center (UC)
   b. Urban Center is contained within portions of Census Tracts 1901.01, 1901.02,
      1902.01, and 1902.02, consists, primarily, of downtown Las Piedras and extending
      north along PR936 for 3 miles. Located in the central sector of Las Piedras, the
      UC is the most urbanized area of the Municipality, and where the vast majority of
      commercial and industrial activity occurs.
   c. Priority Sites Addresses:
      i. Former CDT - PR 198 Las Piedras, PR 00771
      ii. Former Intel Site - PR 30, Las Piedras, PR 00771
      iii. Fernando Roig School - PR 198, Las Piedras, PR 00771
      iv. Matias Rivera School - Rio Guayanes St., Las Piedras, PR 00771
      v. Former Landfill lots - PR 9936, Las Piedras. PR 00771

5. Contacts:
   a. Project Director:
      Marianito Ruiz, Director of Planning
      Municipality of Las Piedras
      P.O. Box 68
      Las Piedras, P.R.
      00771787-733-2160
      planificacion@munlaspiedras.com
b. Chief Executive/Highest Ranking Elected Official
   Mayor Miguel A Lopez Rivera
   P.O. Box 68
   Las Piedras, P.R. 00771
   787-733-2160


7. Other Factors Checklist
   None of the Other Factors listed below apply to the proposed project.

<table>
<thead>
<tr>
<th>Other Factors</th>
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<tr>
<td>Community population is 10,000 or less.</td>
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<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
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<td>The priority brownfield site(s) is impacted by mine-scarred land.</td>
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<td>The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).</td>
<td>Table 1, Page 2</td>
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<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
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<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>Page 3</td>
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<tr>
<td>The reuse of the priority site(s) will incorporate energy efficiency measures.</td>
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<td>30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.</td>
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<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
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8. Letter from the State or Tribal Environmental Authority.
   a. Letter from the Puerto Rico Department of Environmental and Natural Resources is attached.

9. The Municipality of Las Piedras is not making any claims for confidential, privileged, or sensitive information, in this application/document.
Hon. Miguel López-Rivera
Mayor
Municipality of Las Piedras
Apartado # 68
Las Piedras, PR 00771

Honorable Mayor López-Rivera:

MUNICIPALITY OF LAS PIEDRAS ACKNOWLEDGEMENT LETTER FOR THE INTENTION TO APPLY FOR FY-22 US EPA BROWNFIELD’S PROGRAM FOR A COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT FOR HAZARDOUS SUBSTANCES AND PETROLEUM

The Department of Natural and Environmental Resources (DNER) Superfund Program has received a letter from the municipality of Las Piedras informing its intention to apply for a Community Wide Brownfields Assessment Grant for Hazardous Substances and Petroleum.

DNER acknowledges and supports the initiative taken by the Municipality. The identification, inventory development, assessment, cleanup and redevelopment of Brownfields sites will provide an opportunity to enhance the social, economic and environmental conditions in this municipality. DNER encourages the municipality to maintain an open communication with federal and state agencies and to request any support needed.

If you have any questions, please feel free to contact Eng. Melvin Menéndez Figueroa, Environmental Emergencies Response Area Manager, at (787) 999-2200, extensions 5900, 5901 or by e-mail at melvinmenendez@ica.pr.gov.

Cordially,

Rafael A. Machargo Maldonado
Secretary

San José Industrial Park, 1375 Ave Ponce de León, San Juan, PR 00926
IV.E. NARRATIVE/RANKING CRITERIA

1. Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i. Background & Description of Target Area: Founded in 1793, the rural Municipality of Las Piedras (Municipality) in eastern Puerto Rico (PR), has a population of 35,180 (US 2020 Decennial Census) and is 32 miles southeast of San Juan. Our municipality is a working-class community known for the many industries that have thrived here. Beginning in the 1970’s, industrialization allowed for a robust workforce and fostered commercial growth. Our economy was vibrant, in part, due to Section 936 (936 exemption) of the US tax code, which incentivized US companies to operate in PR through valuable tax exemptions. These incentives were eliminated in 2006, causing many companies to leave PR for more tax-friendly countries like Singapore and Ireland. These losses, including 10,000 skilled labor jobs, drove Las Piedras into a deep recession that has lasted over a decade, leading to population decline as people left for the US mainland for employment. Several well-known industries (Intel, Johnson & Johnson, Mars) had their facilities in Las Piedras and their departure was a devastating blow. Now, our biggest challenge is attracting and retaining commerce, in part, due to the many brownfields in the Municipality.

In September 2017, Hurricanes Irma and Maria ravaged Las Piedras, exacerbating extreme socioeconomic and financial pressures, María’s devastating winds and rains destroyed buildings and caused catastrophic landslides. All the electric power and drinking water services were destroyed as were over 600 homes. 25% of commercial properties (many are now brownfields), and 100% of the transportation infrastructure was either blocked by debris or damaged. Basic public services were halted for months, and thousands of residents were forced into temporary shelters due to the total loss of their homes. Many of these properties became brownfields, releasing chemicals like lead paint, petroleum, and other environmental hazards. The storm followed a decade-long economic decline as evidenced by population loss (14% after Maria – Center for PR Studies), business closures, and abandoned homes. This decline resulted in abandoned commercial and industrial properties, school closings due to fewer students, and shuttering of support facilities such as gas stations, all of which deteriorated as investors and development halted due to concerns of contamination. Residents who remained or returned have been recovering from a decade of losses and are enduring a difficult job market with dozens of employers unable or unwilling to reopen businesses after the economic decline, in turn, driving our unemployment to 9.2% compared to 4.1% in the US (06/21, Bureau of Labor Statistics). These challenging conditions have resulted in numerous brownfields in our community as businesses close and caused brownfield redevelopment to slow as resources have been reallocated to more urgent needs.

As employers shuttered their doors after the 936 exemption repeal and hurricanes marred our community, brownfields have steadily become more prevalent. The worst-hit area, where redevelopment investment has the greatest potential, is the Urban Center (UC). This target area is where grant funding will have the greatest impact. A focused effort has been made to invest in the UC, creating detailed reuse plans to maximize investments and leverage funding. If properties outside the target area (below) become high priority during the Cooperative Agreement period, we may choose to invest grant funds on them as well; however the redevelopment focus for this grant will remain in the UC.

The UC (portions of Census Tracts 1901.01, 1901.02, 1902.01, and 1902.02) consists, primarily, of the limits of downtown Las Piedras, and extending north up to PR31 in sector Pueblo del Río. Located in the central and northern sectors of Las Piedras, the UC is the most urbanized area of the Municipality, and where most commercial and industrial activity occurs. For this reason, the UC was hardest hit by the elimination of the 936 exemption. The UC workforce decreased by 10.8% from 2010-2019 (US Census). Those still working are earning significantly less. The Median Household Income (MHI) of UC residents is less than 1/3 of the US (see 2.a.ii). When Maria hit, after the power outages, water shortages, building damage, and loss of basic government services, many UC businesses that closed were never able to reopen, leaving many brownfield properties behind. Municipality officials also state that 75% of property crime activity in the Municipality occurs in the UC. The UC is the location of the priority sites listed in Table 1. Redeveloping the UC will revitalize this portion of our community and reduce area crime, making it more attractive to new businesses, developers, visitors, and residents.

b. Description of the Priority Brownfield Site(s): The target area has a significantly higher concentration of brownfields (estimated 20 in the UC) compared to the rest of our community with the highest priority sites offering the greatest opportunity for successful reuse. Although we have worked hard to address brownfields, dozens remain, including former schools, industrial sites, a landfill, and a...
These sites are our highest priorities because they meet immediate needs in our community, align with our Revitalization Plan, and redevelopment is imminent due to funding already committed ($30M has already been secured) through commitments from the Municipality and private investors to redevelop residential and commercial assets and low-income housing on properties in the target area (1.c.i). Increasing our low-income housing stock through the remediation and redevelopment of the Former CDT will help those hardest hit by job losses and the hurricanes and adding state of the art manufacturing at the Former Intel Site aligns with our goal to reinvigorating our manufacturing history and creating stable, high paying jobs for residents. Once redeveloped, they will serve as examples of success, triggering more investment. With the EPA’s grant funding the initial, high-risk due diligence investment on these sites, the likelihood of a successful redevelopment is much higher.

1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plan: The 2016 Las Piedras Territorial Plan (Revitalization Plan) specifies the reuse of existing vacant and underutilized urban space as a key initiative, creating desperately needed low and moderate income housing, modern industrial and manufacturing development, additional educational facilities, and offering a space for recreation and community activities, especially in the UC. An important goal, considering the previous catastrophes we have experienced, is the development of an emergency management center, made to serve as a safe shelter during natural disasters and as a community center with offices and storage space when the shelter is not in use. Our Revitalization Plan calls for land reuse that addresses economic and environmental concerns while also addressing equity issues for residents, primarily low-income residents and minorities.

Consistent with our Revitalization Plan referenced above, we will diversify and modernize our employment sectors to minimize the impacts of future employer cutbacks/closures and we will create industrial development. This in turn will provide options to locate support services for the industrial and commercial base of the area and residential options desperately needed in the UC. Our Revitalization Plan calls for an increase in low-income housing, providing residential stock constructed with modern techniques. These reuse activities will directly address our need for more jobs and residential options and will encourage people to return to Las Piedras to participate in the restoration of our community and enjoy the redevelopment benefits.

Las Piedras is requesting $400,100, most of which will be used for Phase I and Phase II Environmental Site Assessments (ESAs), providing the initial, highest risk investment necessary for brownfields reuse. This approach will trigger further environmental and redevelopment work with other funding as noted in 1.c.i. For example, plans are underway to redevelop the Former CDT into a new housing complex that will add approximately 125 housing units into the UC where it is most needed. This development will enable us to realize our goal to increase housing stock and will bring $25M in

<table>
<thead>
<tr>
<th>TABLE 1</th>
<th>Priority Sites, Size, Location, &amp; Proximity to Target Area Residents</th>
<th>Historic Use / Current Use &amp; Condition / Planned Reuse (further discussed in Section 1.b.i.)</th>
<th>Suspected Contaminants*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Former CDT – PR 198, 1.4 acres, adjoins low income &amp; minority residential</td>
<td>Former Medical Institution / Vacant, deteriorating structure / Low-income Housing Complex</td>
<td>VOC’s, asbestos, lead paint, mercury, PCB’s</td>
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<tr>
<td>Former Intel Site – PR30, 15.4 acres, adjoins tributaries of the Humacao River, within low income &amp; minority neighborhood</td>
<td>Industrial manufacturing site / Vacant, reusable structure / Industrial development/manufacturing</td>
<td>VOCs, PAHs, PCBs, metals, petroleum</td>
<td></td>
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<tr>
<td>Fernando Roig School – PR198, 2.16 acres, adjoins low income &amp; minority neighborhood</td>
<td>Former school / Vacant, damaged from hurricane, reusable structure / Emergency Management Center</td>
<td>VOCs, PAHs, metals, lead paint, asbestos, petroleum</td>
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<tr>
<td>Matias Rivera School – Rio Guayanes St, 1.71 acres, adjoins low income &amp; minority neighborhood, adjacent to Gurabo River</td>
<td>Former School, Vacant building, reusable structure / Montessori Study Center</td>
<td>VOCs, PAHs, metals, lead paint, asbestos, petroleum</td>
<td></td>
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<tr>
<td>Former Landfill lots – PR 9936, 58 acres, adjoins low income &amp; minority neighborhood</td>
<td>Former landfill / Vacant / Greenspace &amp; park</td>
<td>VOC’s, metals, mercury, PCB’s, phosphates, chlorides</td>
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*The Agency for Toxic Substances and Disease Registry (ATSDR), identifies these contaminants as threats to human health. Health threats include: skin damage, liver, kidneys, heart, spleen, nervous, respiratory, hormonal, blood, and immune systems, and may also cause neurological damage, birth defects and cancer (www.atsdr.cdc.gov).
private investment to our community plus an additional $5M in public funds. Putting redevelopment resources in the heart of the target area will set an example and maximize the likelihood of growth and reuse in this struggling portion of our community. EPA-funded assessment of this property will help leverage funding for its revitalization and create an important development in an area where brownfield reuse is badly needed. Redevelopment of the Former Intel Industrial Site will meet another important reuse goal, and the Municipality is confident that this site will be quickly utilized due to its location and good condition. An estimated 2,900 permanent, well-paying jobs will be created when the site is repurposed, and our community will have access to more industrial development, which is the source of our past progress and success. Construction jobs will be created, and permanent jobs will be in place as planned redevelopment of the priority sites are completed (1.b.ii).

1.b.ii Outcomes & Benefits of Reuse Strategy: Reuse of brownfields will generate higher tax revenue for the Municipality. The Former CDT has over $30M in funding from both the Municipality and private investors committed to redevelopment once environmental investigation funds are secured. All 5 priority sites are in an Opportunity Zone (OZ), making the reuse of these sites attractive to investors. Based on previous, similar development projects in our community, the full redevelopment of Table 1 priority sites will create an estimated 500 construction jobs, 3010 permanent jobs, 123 low-income housing units, modern commercial development, an estimated $3.1M in annual tax revenue and eliminate threats to less fortunate and vulnerable residents such as the poor, elderly, and children. Using these sites as examples, this success story can be duplicated on other sites in the community. Redevelopment of the Former landfill will remove real and perceived environmental contamination (VOC’s, metals, mercury, PCB’s, etc.) and eliminate an environmental threat to the nearby neighboring community. Removing blight’s will help eliminate the crime that is lured by abandoned property. Once this site is redeveloped into a park and greenspace, it will become an asset and create temporary construction and remediation jobs, as well as creating a space for expression and recreation for the citizens. Adding a new Montessori School on the former Matias Rivera School will supply the children of Las Piedras with a system of education that develops their natural interests and activities while reusing a school that has been closed for long and is in disrepair. With the development of an Emergency Management Center on the former Fernando Roig School property, Las Piedras will be better prepared for crisis situations and be well equipped to handle the citizens’ needs in times of difficulty. The recent natural disasters experienced in PR has taught us how important such a facility is and completing environmental investigations on the property will further our plans for this important facility.

Redevelopment of our priority sites will create affordable and sustainable housing, improve economic competitiveness of the UC, create sustainable, commercial developments and jobs (workforce development), and land recycling opportunities by remediating/reducing legacy pollution, and leverage current and future investments. Residents and commercial property owners will benefit from increased property value, improved energy efficiency, and lower maintenance costs associated with new construction. New, energy efficient construction on priority sites, including the use of solar and LEED certification, will reduce energy usage and operating cost on sites where new construction is planned (Former CDT, Former Fernando Roig School). This will create jobs, repatriation, and increase wages for Las Piedras residents. All benefits realized by the redevelopment noted above will be tracked and reported in ACRES (see 3.c). Addressing priority sites in the UC as described above will create affordable and sustainable housing, workforce development (new jobs), and remediate/reduce legacy pollution in areas with high concentrations of minorities and low-income residents. EPA’s investment in brownfields in the UC will help meet Justice40 goals by creating energy efficient, sustainable development, conserving and preserving greenfields, improving health by reducing exposure to contaminants, and turning idled brownfields into new hubs for the growth of our economy. These accomplishments will deliver justice to disadvantaged (due to low income, high unemployment/underemployment, distressed neighborhoods, disproportionate exposure to environmental impacts from brownfields, etc.) residents.

1.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: Target area redevelopment funding is secured for 1 priority site (Former CDT). Private sector funding has been pledged to construct a housing complex on the Former CDT ($30M in reuse funding committed), and the Municipality intends to use the already acquired CDBG funding to invest in the redevelopment of the former Intel site and the Fernando Roig School once risk of the environmental unknowns is
eliminated. In addition, Las Piedras is eligible for and will seek additional funding from the following sources that support anticipated assessment, cleanup, infrastructure, and redevelopment: EPA Brownfield Clean-up grant funds ($500K), US Dept. of Agriculture Rural Economic Development Loans and Grants ($300K grants/$1M in loans for community and economic development aid), Community Development Block Grants (CDBG), CDBG-DR (Disaster Relief) of which over $7M is available to Las Piedras for demolition, infrastructure, and economic development of brownfields, Federal Emergency Mgmt. Agency (FEMA) ($2M available for hurricane-related clean-up and redevelopment), US Economic Development Administration (USED), Dept. of Transportation (DOT) grants, and new funding opportunities/incentives available in the future. Funding from these resources is available for remediation, demolition, site development, infrastructure improvements, streetscape improvements, building rehabilitation, job training, etc., to encourage and complete our reuse strategies. Should EPA funds be awarded for environmental assessment, the EPA grant may qualify as required match to CDBG-DR and other funding discussed above, further leveraging resources for brownfields redevelopment.

We will also seek funds from Puerto Rico Economic Incentives Act, which will be used to encourage investment and development of commercial businesses as planned for some of our priority brownfields. All target properties are located within an Opportunity Zone (OZ), and we will market brownfields as excellent tax shelters under OZ tax incentives, attracting private funds in our low-income areas. We have identified 2 Opportunity Funds in Puerto Rico and will engage them as brownfield redevelopment progresses. We will also attract investors using tax credits through New Markets Tax Credit Benefits. Using EPA funding for the initial high-risk environmental assessment of these sites, brownfield redevelopment will be successful. As properties are assessed, it will stimulate partnerships with many agencies (U.S. Dept. of Housing and Urban Development (HUD), FEMA, PR Dept. of Housing, PR Dept. of Economic Dev. & Commerce, etc.) to fill funding gaps such as demolition funding and reuse incentives, ensuring successful redevelopment. A detailed funding plan will be developed based on individual status and eligibility for each brownfield site or area as assessment projects are realized. CDBG, CDBG-DR, and FEMA funds were just recently released, and we will seek to utilize them immediately. Other funding noted above will also be sought as it becomes available. These funds coupled with insurance funding and the EPA Assessment Grant will enable us to realize and document revitalization success within the next 2-4 years.

1.c.ii. Use of Existing Infrastructure: Our Revitalization Plan’s land use goals emphasize the build-out of existing parcels, and rehabilitation and infill development before additional land is considered for development. Modern utility infrastructure is available to the priority sites and in the target area (3-phase electricity, natural gas, city water and sewer, telephone, and fiber optic service), providing connectivity to new development. Infrastructure damaged by hurricanes has since been repaired and is robust enough to handle the added capacity required by planned reuses and will utilize existing services and other infrastructure (roads, curb cuts, on/off-street parking, & nearby utilities), reducing site reuse costs. With revitalization ranging from residential to industrial, existing infrastructure will allow for easy access for commercial/industrial development, enabling residents the opportunity to work and live in the same neighborhood, creating a walkable community. All priority sites in 1.a.ii adjoin or are near heavily traveled PR30, PR198, and PR936. Additional funding for roads, trails, or other infrastructure necessary for planned reuse will be sought from the US DOT Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Grant program, the recently enacted Infrastructure and Jobs Act, local funds (when available), and CDBG funds.

2. Community Need & Community Engagement, a. Community Need, i. The Community’s Need for Funding: Las Piedras does not have the funds for site assessment in our budget. The only available resource to address brownfield assessments is federal funding. A large portion of our community is low income, with 46% of UC residents falling below the poverty line and MHI less than 1/3 that of the US, making investment in our brownfields an impossibility for our community. After a decade of setbacks, resulting in significant economic decline, we have fewer jobs, reduced tax revenues, damaged municipal buildings and infrastructure, and limited local government resources. We estimate the tax losses locally to be over $5M, and more than 9,000 jobs were lost in the aftermath of the 936 Exemption and the storm. The Municipality operates on a $13.9M annual budget, which cannot fully fund essential services, let alone much needed infrastructure repair and maintenance. Simply collecting debris from the
burden cost over $14M (more than 100% of our annual budget). Brownfield sites add to the financial burden borne by residents, suppressing residential property values, and adding to municipal expenditures through reduced tax base and additional public safety services to brownfield sites for criminal activity as indicated by the high concentration of crime in the UC compared to Las Piedras as a whole. Because of the decade long, island wide recession, the territorial government has no resources to commit to brownfields reuse. Moreover, local governments in PR do not have funding resources commonly available to local governments on the mainland (e.g. Tax Increment Financing), so incentivizing reuse through payment of environmental due diligence is attractive to developers, but we have no tools available at a local or Commonwealth level.

The reuse goals for Las Piedras’s priority brownfield sites are to create greatly needed low and moderate income housing, modern commercial and industrial development, high wage jobs, and increased tourism focused development. With a budget currently only able to provide essential services and much-needed infrastructure maintenance, we lack the discretionary funds necessary to complete the proactive assessment and planning activities that this grant will provide, including clarifying environmental issues on brownfield sites, encouraging developers to seek out and invest in them, and eliminating the risk to the health and wellbeing of our residents and environment. Target area residents have high unemployment and low income where new jobs created by brownfield redevelopment will maximize return-on-investment. Ultimately, this EPA grant will allow us to fulfill our revitalization needs for our target area.

2.a.ii. Threats to Sensitive Population, (1) Health or Welfare of Sensitive Populations: For decades, Las Piedras has suffered extraordinarily low wages and a very high poverty rate. The devastation left by the hurricanes added unprecedented financial burdens to our already poor residents through storm damage costs, loss of work, loss of basic necessities, and very slow recovery. The loss of once thriving industries has left a void in the community, especially in the UC. According to the 2019 ACS, 42% of Las Piedras residents live in poverty compared to 12.3% in the U.S. 46% of the UC residents are living in poverty, and the MHI is $21,667, nearly 1/3 of the United States ($62,843). It is clear that target area residents suffer dramatic wage disparities. Las Piedras has a very high proportion of minorities. This is even more evident in the UC, where nearly 100% of the population is minority. Other sensitive populations are also impacted. 35% of the UC households have one or more people over 65 compared to 30% in the US (2019 ACS). Contaminant pathways from brownfields (e.g. vapor intrusion, groundwater and surface water used for drinking, irrigation, etc., and surface soil exposure) are a threat to residential neighborhoods. Historic development did not consider environmental impacts on nearby neighborhoods, and now, contaminants suspected in our brownfields (Table 1) are potentially causing as yet unknown harm, raising significant environmental justice issues. The result is the exposure of less fortunate residents to contamination present on these brownfields with little ability to improve their condition. For example, the Former Fernando Roig site, located adjacent to a low-income, minority neighborhood, is potentially impacted with metals, VOCs, PAHs, lead paint, asbestos, and other contaminants known to cause various cancers and low birth weight which are experienced by Las Piedras’s residents at a higher rate than the nation (see 2.a.ii(2)). The proximity of brownfields to low-income neighborhoods in our target area drives down housing values, suppresses commercial investment, and limits residents’ access to adequate employment, resulting in a distinct disadvantage to target area residents with no real relief in sight, if nothing changes. The former Matias Rivera School is adjacent to the Gurabo River and a municipal park, introducing health threats to a large group of children (highly sensitive to contaminants such as lead paint, believed to be present on the site) and the local water source through proximity to potential contaminants.

This grant will help better inform us of the environmental conditions at our brownfields. By considering impacts on neighboring properties when developing reuse plans, the risk of exposure will be reduced, sources of contamination will be eliminated, the ecological health of our community will be improved, and livability and equitable development principles will be incorporated.

2.a.ii(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: Sites such as the former schools and the Former CDT are impacted by asbestos. The Center for Disease Control (CDC) suggests the effects of exposure to PCBs, chemicals of concern at the Former CDT, Landfill and the Intel sites, are linked to higher incidences of endocrine system cancer (e.g. thyroid cancer and leukemia among others), which in Las Piedras (32.8/100,000) are over 35% higher than PR. Both priority site schools and
the former Intel site are known or believed to be contaminated with petroleum, which is proven to affect the liver. Liver & bile duct cancer incidences in Las Piedras are 21% more common than in PR. In addition, metals and VOCs on target area sites may be contributing to renal cancers in residents, which are 34% higher in Las Piedras than in PR (all cancer stats from PR Central Cancer Registry). Moreover, mercury, lead, and other metals, as well as VOCs, PAHs, and petroleum constituents are believed to be present on priority sites. These are known to be a threat to unborn children and infants, and the low-birth-weight rate inLas Piedras is 32% higher than the US according to the CDC and the PR Dept. of Health. Health data at the Municipality level is extremely difficult to find, but the data identified does indicate a greater than normal incidence of disease and adverse health conditions in Las Piedras. Each of the priority sites contain at least one of these contaminants, and every priority site adjoins low-income and minority neighborhoods potentially directly linking adverse health conditions to disadvantaged populations.

Currently, there are 44 Las Piedras properties that have environmental records in the EPA’s EnviroFacts database. Nearly half (32.4%) of the housing stock was built prior to 1979 according to the 2015-2019 ACS and older homes have a greater risk for high lead levels from paint. Because of the presence of toxic chemicals and their inevitable impact on the environment near residents’ homes, many operating commercial and industrial facilities add to the environmental threat. Removal of environmental contaminants at brownfields in our community will reduce exposure to our residents, which will help to reduce the greater than normal incidences of disease and other poor health outcomes that disadvantaged populations are currently experiencing.  

2.a.ii(3) Promoting Environmental Justice: The public health impact from target area brownfield properties and industrial operations, and their proximity to impoverished and minority residents has disproportionately exposed them to environmental pollutants, resulting in an inability to improve or in some cases, maintain their health and wellbeing. In addition, the EPA’s EJScreen tool indicates that the UC residents are in the 67th percentile for lead paint exposure and 78th percentile for hazardous waste proximity compared to PR as a whole. EJScreen also indicates that in 2018, the median Risk-Screening Environmental Indicators (RSEI) score for the two sites within a 1-mile radius of the UC is over 10 times higher than that of the median RSEI score for the US. Our brownfield assessment, cleanup, and reuse strategy will improve the welfare of our residents by eliminating the health risk they pose. The EPA grant will play an important role in this, reducing threats by funding environmental investigations needed to trigger stalled cleanup and end disinvestment in the UC. Health indicators such as increased cancer, liver disease, and low birth weight (2.a.ii(2)) will no longer be influenced by environmental impacts caused by target area brownfields. This will be accomplished in areas where the disadvantaged, such as low income and minority populations are highly concentrated, supporting environmental justice goals. Development of a new industrial site (former Intel Site) will increase the jobs in the target area, which will create gainful employment for residents, reduce unemployment and poverty, and increase household income. Job creation will attract new residents and eliminate population loss. The construction of an emergency management center will play an important role as a community center, and in times of crisis, a necessary haven for those in need of assistance. The former CDT redevelopment plan, when complete, will add 125 housing units to accommodate the population growth and meet our low-income housing needs. Other housing improvements will be made utilizing other federal programs (e.g. CDBG) to fund lead paint abatement and other residential improvement. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of the neighborhood, incentivizing further investment and increasing property values. New tax revenue will be generated and reinvested in the community, multiplying investment in the target areas. Funding from an EPA grant will help stimulate investment in brownfields by funding environmental due diligence, a common stumbling block for land recycling in our community, improving the economic status and health of residents near brownfields.

2.b. Community Engagement, i. Project Involvement & ii. Project Roles: Several community partners will support our brownfields program (Table 2). This assemblage of organizations is best suited to engage the community at a grass roots level. They also have regional influence and local ties, maximizing the benefits they bring to the project. A brownfield committee is being assembled from these and other entities, including members of the public, to provide input into the inventory and site prioritization, redevelopment plans, economic development, and community engagement efforts, among others. The committee plans to meet 2-4 times/year to discuss our brownfields program.
Table 2 – Project Partners

<table>
<thead>
<tr>
<th>Org. Name</th>
<th>Point of Contact</th>
<th>Description and Project Roles</th>
</tr>
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<tr>
<td>Community Committees</td>
<td>Juanita Castro (787) 733-2160 <a href="mailto:centropasolaspiedras@gmail.com">centropasolaspiedras@gmail.com</a></td>
<td>Committee comprised of leaders of sectors of the Municipality. The organization will help involve the community in the outreach activities related to the program like site selection and reuse planning.</td>
</tr>
<tr>
<td>Proyecto Multifamiliar Las Piedras</td>
<td>Jose A. Llavonas 939-969-1553 <a href="mailto:eugeniorba@gmail.com">eugeniorba@gmail.com</a></td>
<td>Developer that has worked with several Municipality projects and is committed to the redevelopment of the Former CDT once the environmental due diligence is complete.</td>
</tr>
<tr>
<td>Manufacturer’s Board of Las Piedras</td>
<td>Viliane Ferreira 787-394-5522</td>
<td>Local organization at the grassroots level that will be involved in the sharing of information about the brownfield program and assisting with site reuse planning.</td>
</tr>
<tr>
<td>Agroempresarias</td>
<td>Agro. Nancy Sánchez Villanueva (787) 633-8975 <a href="mailto:nsanchez@agricultura.pr.gov">nsanchez@agricultura.pr.gov</a></td>
<td>National and Municipal organization of agricultural businesswomen involved with the community and urban activities in Las Piedras, will help with outreach activities, site selection and community feedback.</td>
</tr>
<tr>
<td>Medical Services Santini</td>
<td>Luis Santini (787)-697-0046</td>
<td>Health center committed to primary medicine and health will be involved in health monitoring in the Municipality as well as sharing of information and participating in community engagement events.</td>
</tr>
</tbody>
</table>

2b.iii. Incorporating Community Input: Las Piedras has a well-established community involvement program that we will maintain for this grant. A total of 6-9 public meetings will be held during the 3-year grant to maintain stakeholder engagement and continue to gather input on site selection, prioritization, assessment needs, cleanup decisions, mitigation measures from the cleanup and redevelopment activity, and reuse planning. In addition, 2-4 brownfield committee meetings will be held each year. Outreach events, open to the general public, will be advertised through municipal and partner websites, newspapers, radio, and social media (earned media and other low-cost/no-cost, or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA’s Office of Land and Emergency Management Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). The community participants will be updated on advances throughout the grant, as well as have the opportunity to share input through comment opportunities on municipal and partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community input without access to digital resources. Because we have a large non-English speaking population, Las Piedras has multi-lingual staff to interpret presentations and translate documents in Spanish and English. We have already begun engaging target area residents, business owners, and community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the second quarter of the grant period to discuss goals, planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize stakeholder engagement. We will contact regional developers to bring awareness of the reuse opportunities priority sites offer. When developers are identified, they will attend public meetings to share their redevelopment plans. Las Piedras staff will catalog stakeholder input for reference when determining assessment and redevelopment priorities. As the project progresses, we will involve stakeholders in the decision-making process regarding prioritization, assessment, site marketing, cleanup planning, and feedback on reuse. When stakeholder input is received, we will evaluate it against our development goals and available resources, adopting feedback that feasibly meets these criteria.

3. Task Descriptions, Cost Estimates & Measuring Progress, a. Description of Tasks/Activities & Outputs: Las Piedras will begin grant-related activities immediately upon award confirmation, working to prepare a Work Plan approved by the EPA PM/PO. After the Cooperative Agreement period begins, Las Piedras and its QEP will complete the following tasks:

Task/Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization

i. Project Implementation: Municipality staff will travel to the Puerto Rico Brownfields Week and the national brownfields conference, participate in calls, meetings, and correspondence between the
Municipality, QEP, EPA, etc. to manage the grant’s Cooperative Agreement. We will complete Quarterly, DBE, Annual reports, and ACRES database entries, and will carefully track contractor costs, comparing to the budget, expenditures, project progress, and milestones to ensure the timely expenditure of grant funds within the prescribed 3-year project period. The Municipality, with QEP support, will continue to develop a brownfield inventory and will use it as a tool to help accomplish brownfield reuse goals. Inventoried sites will be prioritized based on the following criteria, in no particular order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input.

ii. Anticipated Project Schedule: QEP will be selected through a competitive bidding process (compliant with federal procurement regulations - 2 CFR 200.317 - 200.326) before Cooperative Agreement period begins; correspondence will occur at least monthly (more frequently as specific project activities require) throughout the grant period; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder of the grant period; ACRES updates will be conducted at least quarterly throughout the grant period.

iii. Task/activity Leads: Las Piedras & QEP

iv. Outputs: Travel-Municipal staff to regional and national brownfields conferences/meetings; prioritized inventory; project performance reports: 12 Quarterly Reports, ACRES Entries, 3 DBE reports, 3 annual reports, etc.; calls, meetings, and correspondence between the Municipality, QEP, EPA, etc. to manage the grant’s Cooperative Agreement.

Task/Activity 2: Environmental Investigation

i. Project Implementation: Prior to applying for site eligibility under the grant, an access agreement will be prepared and executed for each site being considered. Eligibility determinations will be completed under this task, and the QEP will complete Phase I ESAs activities on sites selected by the Municipality. All Phase I ESAs will be conducted by/in accordance with the applicable ASTM standard (anticipated E1527-21) and the All Appropriate Inquiry (AAI) rule. Areas of focus will include those already identified as priority sites listed in Table 1: The QEP will prepare a Quality Assurance Project Plan ((QAPP) as well as Sampling & Analysis Plans/Health & Safety Plans (SAP/HASP) for EPA approval. Once approved, the QEP, directed by the Municipality, will complete Phase II ESAs based on environmental conditions identified in the preceding Phase I ESAs.

ii. Anticipated Project Schedule: Obtain site access, request eligibility determinations & finalize site access to initial sites for investigation-early 2nd Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 11th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted-45 days before end of grant period.

iii. Task/activity Leads: Las Piedras & QEP

iv. Outputs: 10 Phase I ESAs; QAPP and SAP/HASP; estimated 7-9 Phase II ESAs.

Task/Activity 3: Clean-up Planning:

i. Project Implementation: The QEP, directed by the Municipality, will prepare site specific clean-up plans/documents, including: Analysis of Brownfield Cleanup Alternatives, remediation plans, site closure letter requests, and clean-up funding development (1.c.i).

ii. Anticipated Project Schedule: Prepared after Phase I and II ESAs are complete, contamination is present, and cleanup is even necessary. Task 3 activities will continue throughout the grant period.

iii. Task/activity Leads: Las Piedras & QEP

iv. Outputs: 5-10 cleanup planning documents

Task/Activity 4: Community Outreach & Involvement:

i. Project Implementation: 6-9 public meetings will be held during the grant period to update the community on ESA progress and seek public input/involvement. Print and mail material for project/site information and marketing documents will also be funded under this task. The Municipality will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program and will attend/participate in outreach events. Social media outlets and other online media will be developed/maintained, and outreach efforts will inform the public on the progress of investigation/cleanup planning activities and provide marketing resources for future development.

ii. Anticipated Project Schedule: 2-4 brownfield committee meetings planned per year and 2-3 public meetings planned per year with the 1st planned for the 2nd Quarter of the grant period.
iii. Task/activity Leads: Las Piedras & QEP

iv. Outputs: 6-9 public meetings to update the community on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc.

We will work diligently to assure startup activities are completed per the tasks and schedule above. The Municipality will allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the Cooperative Agreement contract. The Cooperative Agreement period is 3 years, however, because there is a high demand for assessments and site access has already been obtained for some of the highest priority sites in Table 1 (Former CDT and Former Intel Site), it is likely that funds will be spent prior to the end date. We are proactively communicating with representatives of privately-owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and redevelopment. These discussions create a positive dialog between property owners, local government, and impacted citizens.

3.b. Cost Estimates: We will allocate $337,500 to Phase I and II ESAs (or 84% of total grant funding assigned to ESAs). The costs outlined in Table 3 were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1.

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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Travel</td>
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<td>$30,000</td>
<td>$12,000</td>
<td>$400,100</td>
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<td>$337,500</td>
<td>$30,000</td>
<td>$12,000</td>
<td>$385,900</td>
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<td>$1200</td>
<td>$200</td>
<td>$1200</td>
<td>$400,100</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>$20,400</strong></td>
<td><strong>$337,500</strong></td>
<td><strong>$30,000</strong></td>
<td><strong>$12,200</strong></td>
<td><strong>$400,100</strong></td>
</tr>
</tbody>
</table>

Table 3 only includes budget categories with costs. In accordance with Federal, State, and local procurement regulations.

Grant tasks will be completed at the anticipated costs per unit with the following anticipated outputs/outcomes:

1. Program Management & Training Support, Inventory/Prioritization: $20,400 – Travel: Attend National Brownfield Conf.: airfare x 2 @ $1,400, 2 rooms, 3 nights lodging @ $1,700, meals @ $650, ground transportation @ $250 = $4,000, Contractual: total $16,400, includes approximately 125 hrs. $80/hr. = $10,000 for inventory, & approximately 80 hours $80/hr. = $6,400 for program mgmt.

2. Env. Investigation: $337,500 – Contractual: 10 Phase I ESAs at an average cost of $3,750 each = $37,500, & 7-9 Phase II ESAs at an estimated cost of $30,000-$45,000 (depending on site complexity/environmental conditions) = $300,000 ( @ $37,500 average cost). Though our budget will support 10 Phase I’s and 7-9 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in 1.a.ii.

3. Clean-up & Reuse Planning: $30,000 -- Contractual: 5-10 ABCAs/clean-up plans expected to cost $3,000-$6,000 each = $30,000.

4. Community Outreach & Involvement: $12,200 – Supplies: printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = $200, Contractual: approx. 150 hours at an estimated $80/hr. = $12,000.

3.c. Measuring Environmental Results: We will track, measure, and evaluate progress through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of grant performance, ACRES entries, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in 3a are not being met, we will create a corrective action plan to identify deficiencies and make the appropriate adjustments necessary to achieve the anticipated outputs on schedule. Further, the Assessment Grant will have the following measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels, acreage made ready for greenspace/recreation, and leveraged monies. These and other statistics will be included in quarterly reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program success. At the close of the grant, the Municipality will provide a final report to the EPA and our residents summarizing project outputs and outcomes. After evaluation of sites is done, it is the Municipality’s best interest that redevelopment happens, and as such, close monitoring of subsequent actions will be done diligently. Outputs and outcomes following the close of the grant will be uploaded to EPA’s ACRES page for continued monitoring of the program’s success.
4. Programmatic Capability & Past Performance, a. Programmatic Capacity, i. Organizational Capacity, ii. Organizational Structure and iii. Description of Key Staff: Las Piedras’s Dept. of Planning (DP) will manage this grant. This office has previously managed many other economic development resources valued at over $25M in the past 10 years, including those listed in 4.b.ii(1).

The DP, supported by other staff, has the technical, financial, and administrative ability and capacity in place to implement this grant successfully. Mr. Marianito Ruiz Losada, Director of Planning will serve as the Project Manager and will handle the day-to-day programmatic tasks, oversee/manage the work performed by the QEP, and will lead community outreach activities. Mr. Ruiz has been with Las Piedras for 12 years with efficient grant management experience. He has been integral to the success of many other grant programs in which Las Piedras has participated, including those listed in 4.b.ii(1), and has extensive experience managing grant activities for Las Piedras. Mr. Ruiz will be assisted by Edjoel Cosme, Director of Federal Programs, and Nancy Losada Soto will provide administrative support. Mr. Ruiz will use his previous redevelopment and economic development experience to seek reuse opportunities for those sites without secured redevelopment contracts. Las Piedras’s Director of Finance, Omayra Agosto Santiago, will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. She has provided these services on many other grant and loan programs benefiting the Municipality. Ms. Agosto will be assisted by the Las Piedras Department of Finance staff. Staff assigned to this project have all worked for the Municipality for at least 7 years. Our workforce is stable with little staff turnover and has the capacity to effectively manage this grant.

4.a.iv. Acquiring Additional Resources: The Municipality will have the aforementioned staff overseeing the application process as well as the acquisition of additional resources. Through a competitive bidding/procurement process, we will select a QEP according to federal procurement regulations (2 CFR 200.317 through 200.326) and with experience with EPA Brownfields Grants and working with the PR Department of Natural and Environmental Resources (DNER). The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 3-year project period. This team will be supported by other municipal departments including finance, utilities, engineering, the legal department, and the office of the Mayor. As appropriate, we will utilize visioning sessions and other assistance/advice offered by the Technical Assistance for Brownfields (Region 2 TAB program) to maximize the incorporation of community input.

4.b. Past Performance & Accomplishments, ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements. (1) Purpose & Accomplishments: Las Piedras has not received an EPA Brownfields grant; however, we have received relevant federal/non-federal assistance agreements. Table 4 lists some agreements received in the past 5 years.

<table>
<thead>
<tr>
<th>Awarding Agency</th>
<th>Project</th>
<th>$ Received</th>
<th>Accomplishments/Outputs/Outcomes/Measures of Success</th>
</tr>
</thead>
<tbody>
<tr>
<td>HUD Section 8 Program</td>
<td>Low Income Housing Assistance</td>
<td>$626,074</td>
<td>Provided 125 safe and affordable housing units to low-income elderly residents</td>
</tr>
<tr>
<td>Community Development Block Grant (CDBG)</td>
<td>Facilities and low-income housing rehabilitation</td>
<td>$657,127</td>
<td>Provided building materials assistance to rehabilitate several facilities and deteriorated housing owned by low-income families in the Municipality. Improvements were made to public ways of access.</td>
</tr>
<tr>
<td>Federal Emergency Mgmt. Agency (FEMA)</td>
<td>Public way and storm drain rehabilitation</td>
<td>$896,904</td>
<td>Excavation and removal of collapsed storm drain and public road, rehabilitation of the water system and repaving of the road.</td>
</tr>
</tbody>
</table>

4.b.ii(2) Compliance with Grant Requirements: All funding assistance agreement terms and conditions were met for the above-mentioned projects, including reporting of the number of residential units constructed and who/where/how many received section 8 vouchers under the HUD program, financial reports, quarterly progress reports, and final reports were completed. HUD quarterly and final reports are like the EPA Brownfields Grant program’s and are due at the same time; therefore, a coordinated effort will be used to create a synergy in reporting outputs/outcomes of both when we have funding from these programs simultaneously. All goals, outputs, and outcomes (indicated in Table 4) in the workplans of the previous grants were achieved, and reports discussed were completed in a timely manner. Because goals, outputs, and outcomes were met without incident, no corrective measures were necessary or taken. The Municipality was fully compliant with the terms and conditions of these grant programs and follows all reporting and performance protocols.
III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility
The Municipality of Las Piedras meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of Puerto Rico. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.2 Community Involvement
Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community’s Brownfields program’s success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions and solutions. 6 to 9 outreach events (2-3 per yr.) will be held throughout the grant period to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures from cleanup/redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes, we will follow existing recommendations/guidance including EPA’s Office of Land and Emergency Management Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

III.B.3 Named Contractors and Subrecipients
The Municipality of Las Piedras has not procured/named any contractors or subrecipients.

III.B.4 Expenditure of Assessment Grant Funds
This criterion is not applicable as Municipality of Las Piedras is not a current EPA Brownfields Assessment Grant recipient.

III.C. Additional Threshold Criteria for Site-Specific Proposals Only
This criterion is not applicable for a U.S. EPA Community-wide Brownfields Assessment Grant application.

III.D. Additional Threshold Criteria for Community-wide Assessment Grants for States and Tribes Only
This criterion is not applicable because Las Piedras is a local unit of government, not a State or Tribe.