Mr. Luis Gallardo
Director Ejecutivo
Centro para la Reconstrucción del Hábitat
220 calle Manuel Domenech #644
San Juan, PR 00918

Dear Mr. Gallardo:

CENTRO PARA LA RECONSTRUCCION DEL HABITAT ACKNOWLEDGEMENT LETTER FOR THE INTENTION TO APPLY FOR FY-22 US EPA BROWNFIELD'S PROGRAM FOR A COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT

The Department of Natural and Environmental Resources (DNER) Superfund Program has received a letter from the Centro para la Reconstrucción del Hábitat informing its intention to apply for a Community-Wide Brownfields Assessment Grant.

DNER acknowledges and supports the initiative taken by the Centro para la Reconstrucción del Hábitat. The identification, inventory development, assessment, cleanup and redevelopment of Brownfields sites will provide an opportunity to enhance the social, economic and environmental conditions in the municipalities of Vega Baja, Toa Baja and Culebra. DNER encourages the Centro para la Reconstrucción del Hábitat 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

787.999.2303 www.drna.pr.gov 787.999.2200
Brownfields Assessment Grant Information Sheet

1. Applicant Identification
Center for the Reconstruction of the Habitat
220 Calle Manuel Domenech Unit #644 San Juan, PR 00918

2. Funding Requested
Community-wide Assessment Grant

2.b. Federal Funds Requested
$500,000

3. Locations
   A. Vega Baja, Puerto Rico
   B. Toa Baja, Puerto Rico
   C. Culebra, Puerto Rico

4. Target Area and Priority Site/Property Information
   A. The Cabo Caribe Industrial Park of Vega Baja, Intersection of PR-6172 and 1st Street, Vega Baja. Part of the census tract 5603.
   B. The María Libertad Gómez School of Levittown, Toa Baja, Intersection of Aldila Street and Azalea Passage. Part of the census tract 1202.
   C. Playa Sardinas II Industrial Building, Culebra, Intersection of Escudero Street and Villa Pesquera Street. Part of census tract 9505.

5. Contacts

   Project Director
   Luis Gallardo - (787) 396-6606 - gallardo@crhpr.org
   220 Calle Manuel Domenech Unit #644 San Juan, PR 00918

   President
   Belinés Ramos - (939) 218-7259, belines.ramos@upr.edu
   220 Calle Manuel Domenech Unit #644 San Juan, PR 00918

6. Population
   A. Vega Baja, Puerto Rico - 50,023
   B. Toa Baja, Puerto Rico - 74,271
   C. Culebra, Puerto Rico - 1,714
### 7. Other Factors-

<table>
<thead>
<tr>
<th>Sample Format for Providing Information on the Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>1</td>
</tr>
<tr>
<td>The priority site(s) is impacted by mine-scarred land.</td>
<td></td>
</tr>
<tr>
<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>1</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain.</td>
<td>1,2</td>
</tr>
<tr>
<td>The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td></td>
</tr>
<tr>
<td>The reuse of the priority site(s) will incorporate energy efficiency measures.</td>
<td></td>
</tr>
<tr>
<td>30% or more of the overall project budget will be spent on eligible reuse/areawide planning activities, as described in Section I.A., for priority site(s) within the target area.</td>
<td>8</td>
</tr>
<tr>
<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>
<td></td>
</tr>
</tbody>
</table>

### 8. Letter from the State or Tribal Environmental Authority
See attached.

### 9. Releasing Copies of Applications
N/A
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION
1.a. Target Area and Brownfields
1.a.i. Background and Description of Target Area

The CRH will be carrying out community assessment within the following areas in three separate target areas in order to capture a diverse sample of Puerto Rican neighborhoods. Each of these municipalities have existing agreements with the CRH for the creation of community-focused nuisance and blight-reduction programs. The target areas are as follows:

- Municipality of Vega Baja – Once a bustling industrial town, its Cabo Caribe region was a key part of Puerto Rico’s sugar industry. One of the it’s oldest sugar mills operated for almost two centuries. The sugar produced in these mills were transported through Puerto Rico’s now extinct railroad. Population: 50,023.
- Municipality of Toa Baja – A primary suburban municipality featuring one of the largest planned communities in Puerto Rico, built by the same Levitt brothers who built Levittowns in New York, Pennsylvania, and New Jersey. The company started out in 1962 by buying nearly 440 acres of flat swampland in the town of Toa Baja, building drainage canals to empty into an artificial lake. This is the reason why most of this community is within floodplains and was one of the communities most suffered after Hurricane Maria hit the island. Today, the municipality is plagued by high vacancy and abandonment rates. Population: 74,271.
- Municipality of Culebra – One of the two island municipalities of Puerto Rico and like the other island municipality was used by the U.S. Navy as a bombing and gunnery range from 1935 through 1975. After the U.S. Navy left, the island suffered from disinvestment which was further worsened by the closing of the pharmaceuticals industries that left after the elimination of the federal tax benefits for this industry. Population: 1,714.

In Vega Baja, the CRH’s community outreach efforts have identified 157 blighted properties (including residential, business, and industrial), including 20% with rubbish deposits, 43% accumulation of garbage, 15% illegal dumping sites, 13% with mosquito hatcheries, 5% human waste, and 1% with oil spills. In addition, feature evidence of 10% illegal drug use. In Toa Baja (where the CRH has collaborated for longer), a total of 489 nuisance properties have been identified, featuring 9% inadequate storm water disposition, 47% rodent infestations, 1% oil spills, and 12% illegal trash dumps. Finally, on-going community mapping in Culebra has identified 28 problem properties, 47% of which have an accumulation of rubbish and 11% identified as illegal dumping sites. In addition, 22% feature abandoned automobiles, 36% human waste, and 32% mosquito hatcheries. With all three municipalities bordering bodies of water, these numbers are alarming. There are a wide-range of problem properties and potential brownfields that the CRH may include in its assessment initiative and are entirely aligned with the brownfields programs’ mission.

1.a.ii. Description of the Priority Brownfield Site(s)

Puerto Rico currently has one of the highest vacancy and abandonment rates in the U.S. Having experienced its rapid industrialization “boom” during the mid 20th century, Puerto Rico has since then suffered an economic recession, mass migration, hurricanes Irma and Maria, and has been battered by the negative effects of COVID-19. In effect, the streetscape is littered with abandoned residential, commercial, and industrial structures and lots, some of which feature actual or perceived environmental issues. The CRH presents the following proposal with the aim to carry out brownfield assessment and planning activities in three municipalities, each of which already have working partnerships and which have mapped a number of properties of interest.

Though environmental impact studies have yet to be carried out, the CRH has identified a number of potential sites that demonstrate the complex environmental problems characteristic of potential brownfields in the region, including the possible presence of hazardous substances, petroleum, and...
exposures for sensitive populations. To highlight the need for brownfields assessments the CRH offers the following sites, each of which demonstrate the possibilities of re-use through collaboration with the EPA’s brownfields programs.

A. **The Cabo Caribe Industrial Park of Vega Baja**, where the CRH has identified eight properties in a total state of abandonment. Environmental issues include the presence of chemicals, dyes, greases, and contaminated runoff water. Previous municipal task forces have fostered the possibility of the industrial zone being converted into a park for light industry (such as construction machinery rental or hardware depots), opening the door to more economic possibilities in line with Puerto Rico’s post-manufacturing reality. This industrial park is within the census tract 5603.

B. **The Maria Libertad Gómez School of Levittown, Toa Baja** was closed in 2017 and since then has become an illegal dumping site, including trash, rubbish, and waste from nearby businesses. This property has already benefited from a Targeted Brownfield Assessment and the CRH seeks to carry out a Market Study and Site Reuse Vision. This property is part of the census tract 1202.

C. **Playa Sardinas II Industrial Building, Culebra**, located in the northern peninsula of the island municipality. The remains of these factories are still present and in a total state of abandonment. The municipality has explored the possibility of converting the facility into a center for environmental investigation and learning, preferably in collaboration with a university. This property has already benefited from a Targeted Brownfield Assessment and the CRH seeks to carry out a Market Study and Site Reuse Vision. The census tract of this island municipality is 9505.

None of the above-mentioned potential sites of interests are on the National Priorities List, nor according to the limited information the CRH has been able to obtain have unilateral administrative orders, court orders, administrative orders on consent, judicial consent decrees, or ongoing or anticipated enforcement activities; they are exempt CERCLA liability criteria; and neither are subject to the jurisdiction, custody, or control of the U.S. government.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

The CRH feels strongly that redevelopment strategies must be in line with land use and revitalization plans. Most importantly, the oncoming wave of post-hurricane reconstruction efforts as well as the designation of the majority of the island as an Opportunity Zone, must take full advantage of the island’s massive inventory of abandoned properties and already-established infrastructure. This proposal is entirely in line with public policy as established by Commonwealth Act 212-2002 (known as the “Rehabilitation of Urban Centers Act”), which seeks to repopulate traditional urban centers.

Possible uses are many and should be in sync with each community’s context. The industrial complex in Vega Baja for example, features the necessary proximity to roadways, access to infrastructure, and the municipal government is interested in converting this site that was destined to heavy industries to light industries to be able to attract a wide range of investors. The vision of reuse of the former industrial park in Culebra is to convert it into a laboratory of marine science and a small museum in order to attract ecological tourism and investigations related to marine life. The former Maria Libertad Gomez school in Levittown, due to its spacious parking lot, adjacency to the municipality’s most well-known planned suburban community, can be converted into a specialized school. This former school has already received visits from learning institutions seeking available spaces for expansion. Nevertheless, as a potential brownfields site, marketing opportunities are limited. Finally,

1.b. ii. Outcomes and Benefits of Reuse Strategy

Multiple studies conducted in the U.S. have demonstrated the negative and disproportionate impacts on the physical and psychological health of marginalized populations, including people with
disabilities, people with low incomes and wealth, communities of color, and jurisdictions with high economic inequality. There is also a correlation between high concentrations of blight and violence, higher population rates of chronic illnesses, mental distress, and exposure to environmental health risks that increase respiratory diseases and lead poisoning. Additional risks include increased contamination of water bodies, infestations of disease vectors including rodents and insects, misuse of insecticides and rodenticides, storm-water issues, and similar issues.

Not only does this project seek to eliminate these health and environmental risks, but it also has the potential to increase access to affordable housing; enhance the livability and economic vitality of neighborhoods that are distressed; increase local tax base; new job growth; reuse of existing infrastructure; minimize development pressure from undeveloped land, particularly within the context of the hurricane Maria recovery; prevent sprawl; reduce natural habitat destruction; eliminate blight; contribute to greener and healthier homes, buildings, and neighborhoods; mitigate environmental conditions; improve access of residents to greenspace, recreational spaces, transit, schools, and non-profit uses; reduce toxicity, illegal dumping of potential hazards, and blighted vacant parcels; retain residents who are contemplating emigration; and obtain other economic, environmental, and social benefits.

1.c. Strategy for Leveraging Resources
1.c.i. Resources Needed for Site Reuse

The proposed projects represent the first step towards the repurpose of abandoned brownfields, and thus, the CRH is fully aware of the need to seek additional resources for specific site reuse. By producing a number of site assessments, environmental studies, market viability studies, and other planning activities will not only demonstrate the severity of the problem but will also lay the ground for making units Ready for Anticipated Use (RAU). Also, considering the lack of formal vacant and abandoned property registries among municipalities, this project provides a rare opportunity to demonstrate the massive potential that brownfield redevelopment may have on Puerto Rico’s reconstruction and recovery efforts. In addition, it will demonstrate the benefits of municipalities tying in their code enforcement activities with brownfields remediation.

Considering this, the CRH seeks to leverage resources utilizing a variety of sources of funding. As a non-profit 501(c)(3), the organization qualifies for additional brownfields funding and loans and CDBG-DR offers two examples of ideal public-sector funding opportunities. In addition, the CRH has recently received a Ford Foundation grant for the creation of an Opportunity Zone Social Investment Fund, which will definitely provide valuable experience and knowledge for the leveraging of future resources. Finally, the CRH has experience leveraging Community Reinvestment Act funding for its activities from banking institutions located both inside and outside of Puerto Rico.

1.c.ii. Use of Existing Infrastructure

By fostering the reuse of abandoned and vacant brownfields properties in densely urbanized areas, this project serves the potential to decrease infrastructure costs, such as those related to access electricity, water, communications and transportation services, that represent high costs for investors and government alike. Geographic Information System analysis has been carried out with roadway, building footprint, primary water lines, and electric grid data layers and the targeted areas all fall within existing infrastructure. Any developments that stem from this project will piggyback on such infrastructure. Mass emigration and crisis-level vacancy and abandonment rates have resulted in underutilized infrastructure in urbanized areas, and thus, leeway for advancing projects with little to no need for additional infrastructure.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
2.a. Community Need
2.a. i. The Community’s Need for Funding
Puerto Rico in recent years has suffered from a crisis of blight and abandonment, as the closure of manufacturing, local recession, and mass emigration has left urban centers, suburbs and rural areas alike littered with vacant properties, many of which may be contaminated. Though there lacks data regarding abandonment in commercial and industrial zones (one of the reasons the CRH is so adamant about seeking brownfield funding), vacancy rates in Vega Baja, Toa Baja and Culebra were 25.0%, 26.5% and 69.20%, respectively. These are two and almost six times more than the U.S.-wide vacancy levels at 12.2%. These numbers - combined with the Commonwealth government’s fiscal crisis and weariness from private parties to invest in these types of properties – demonstrate a deep need for environmental assessment, remediation, rehabilitation and redevelopment.

Cities have also largely failed to address blight, and per a 2019 survey carried out by the CRH, 60% of all the municipalities in Puerto Rico lack an established public nuisance program. The U.S. Department of Housing and Urban Development estimates that approximately 300,000 vacant properties are not even on the market. Nevertheless, if community assets and redevelopment opportunities are not identified immediately, there will be additional pressures for new construction and sprawl as well as an increased burden on the island’s delicate infrastructure. In said case, post-disaster reconstruction efforts will have been rolled out without addressing the accumulation of potential brownfield sites.

2.a.ii. Threats to Sensitive Populations

The activities being proposed by the CRH will address and facilitate the identification and reduction of threats to sensitive populations. Per EJSCREEN, Vega Baja, Toa Baja, and Culebra have a whopping high Demographic Index of 80%, 87%, and 85% respectively. Median family income is $25,105 for Vega Baja, $19,617 for Toa Baja and $23,333 for Culebra compared to $57,652 for the U.S. Though Census tract-specific data on health issues is not available, general data has been obtained from the U.S. Department of Health and Human Services, U.S. Census Bureau, Center for Disease Control, and the National Cancer Institute regarding the potential for addressing the following threats:

- **Health or Welfare**: the activities proposed will allow for the identification of contaminated sites that are hazardous to public health and welfare. This wide range of environmental issues endangered these populations. By advancing the elimination of these risks, target areas will receive long-term benefits associated with cleaned, revitalized, and well-used green and public spaces, including places for gatherings, outdoor recreation, improved stormwater management, increased vegetation, increased self-sufficiency, and community resiliency.

- **Greater Than Normal Incidence of disease and Adverse Health Conditions**: Many health conditions related to exposure to contamination in its many forms are predominant in Puerto Rico. Childhood lifetime asthma prevalence in Puerto Rico is 28.9% in comparison to 13.8% nationally, for example. Cancer rates are also 20% higher than in the U.S. Proposed activities will identify and help eliminate the presence of hazardous substances, pollutants, contaminants, controlled substances, and petroleum or petroleum products, all of which have been linked to greater than normal incidence of disease.

- **Economically Impoverished/Disproportionately Impacted Populations**: The target areas not only include large pockets of poverty, but also hazardous activities that disproportionately affect the local populations (such as urban blight, abandoned industrial zones, and illegal dumping of potential hazards, among others). This is further complicated by the presence of multiple sources of pollution near waterways in each of the areas. In addition, potential priority sites have the opportunity to provide community-wide economic and affordable housing opportunities.

2.b. Community Engagement

2.b.i. Project Involvement

The CRH utilizes a participatory approach as the driving force between almost each of the project’s tasks. In addition, formal MOUs are signed with the different neighborhood associations, community-based
NGOs, and municipalities that it works with. In these three municipalities alone, the CRH has carried out 14 community meetings during the past year with a total attendance of 287. The CRH will continue its engagement efforts with a series of open meetings in each of the target areas, where citizens will be briefed, consulted, oriented, and consulted regarding community data gathering and additional dissemination efforts. Side-by-side CRH staff and contractors, members of the community will have the opportunity to learn how to identify the diverse range of brownfield sites in their target areas. The CRH will also accept site-specific referrals and applications from citizens during this period.

Once community listings are finished, data will be gathered, analyzed, and organized by CRH staff and contractors. The properties that this data contains will be characterized per their estimated level of contamination, deterioration rate, historic value, potential use, among other factors. The CRH will assist communities in envisioning future uses for their brownfields and match them with local community priorities, market conditions, infrastructure availability, environmental concerns, public health issues, and local ordinances. Sites that are most apt for rehabilitation will be selected by the community for environmental assessment, evaluation of market viability studies, market studies, and site reuse vision plans to further their RAU potential.

2.b.ii. Project Roles

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of contact (name, email &amp; phone)</th>
<th>Specific involvement in the project or assistance provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Municipality of Vega Baja</td>
<td>Veronica Bruno, <a href="mailto:vbruno@vegabaja.gov.pr">vbruno@vegabaja.gov.pr</a>, (787) 855-2500</td>
<td>• Assist with community outreach (Task 2)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Channel referred sites through the city’s code enforcement efforts (Task 3)</td>
</tr>
<tr>
<td>Municipality of Toa Baja</td>
<td>Isabel Iliveri, <a href="mailto:iolivieri@toabaja.com">iolivieri@toabaja.com</a>, (787) 261-0202</td>
<td>• Assist with community outreach (Task 2)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Channel referred sites through the city’s code enforcement efforts (Task 3)</td>
</tr>
<tr>
<td>Municipality of Culebra</td>
<td>Roberto Morales, <a href="mailto:directorfederalesculebra@gmail.com">directorfederalesculebra@gmail.com</a>, (787) 742-3521</td>
<td>• Assist with community outreach (Task 2)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Channel referred sites through the city’s code enforcement efforts (Task 3)</td>
</tr>
<tr>
<td>Sabana Seca, Toa Baja Neighborhood Association</td>
<td>Lucy Ortíz, <a href="mailto:jusyluc7@gmail.com">jusyluc7@gmail.com</a>, (787) 662-4782</td>
<td>• Assist with community outreach (Task 2)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Assist with community outreach (Task 2) and reuse planning (Task 4)</td>
</tr>
<tr>
<td>Islas de Mujeres</td>
<td>Dulce del Río, <a href="mailto:mujeresdeislas@gmail.com">mujeresdeislas@gmail.com</a>, (787) 413-3436</td>
<td>• Assist with community outreach (Task 2)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Assist with community outreach (Task 2) and reuse planning (Task 4)</td>
</tr>
<tr>
<td>League of Cities</td>
<td>Cristina Miranda, <a href="mailto:cristina@eltallerd.com">cristina@eltallerd.com</a>, (787) 382-4078</td>
<td>• Assist with municipal relations as well as leveraging for future partners (Task 3)</td>
</tr>
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</table>
iii. Incorporating Community Input

Local communities will be involved in the planning, implementation and assessment of brownfields. The CRH will assist communities in envisioning future uses for their brownfields to match them with local community priorities, market conditions, environmental contamination, public health issues, and local ordinances. Reuse proposals and the properties which will receive environmental assessment, market viability studies, and other planning activities will be selected from said participatory process.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS
3.a. Description of Tasks/Activities and Outputs
3.a.i. Project Implementation

<table>
<thead>
<tr>
<th>Task/Activity: Community Involvement</th>
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<tr>
<td>i. Project Implementation</td>
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<tr>
<td>The CRH will initiate its community engagement efforts, including meetings in each of the targeted areas where citizens will be briefed, consulted, and oriented, regarding data gathering and additional dissemination efforts. The CRH will then initiate inventory work through a review of its community mapping in order to list and hone in on those with potential hazardous and petroleum-contaminated brownfields sites, emphasizing areas surrounding priority sites. Community listings will be completed, and data will be gathered, analyzed, and organized by a contracted external analyst(s). Sites will be characterized per their potential contamination by hazardous substances or petroleum, the operational history and current use, environmental concerns, how the site became contaminated, and the nature and extent of the contamination. The CRH will also gauge each potential properties’ legal and ownership status to test viability for future public acquisition and third-party transfer under Puerto Rico’s new nuisance and land banking legislation. The gathering of this data, as well as the active community involvement, is crucial for a second round of meetings where stakeholders will participate in community planning to provide an area-wide Reuse Vision plan (which will be prepared and disseminated to the community and relevant public agencies). Communities will utilize available data for site selection and hone in on those properties with the highest potential to address each target area’s priorities, market conditions, infrastructure, contamination, public health issues, and local ordinances.</td>
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| Anticipated Project Schedule: Community engagement efforts will begin by month two, parcel-by-parcel review of target areas and their dissemination with the community will commence by month five, and community briefings regarding planning studies will begin on month seven and will continue throughout the grant period. The community outreach phase will finalize by month 22. |

| iii. Task/Activity Lead(s): Community Involvement Coordinator/Community Environmental Lawyer and Technicians |
| iv. Outputs: 18 community meetings, a community database of potential brownfields, and three community Reuse Vision plans for area-wide brownfields reuse. |
### Task/Activity: Assessment

<table>
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<th>i. Project Implementation</th>
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<tr>
<td>After purging current community maps for potential brownfields, the CRH will further hone in on those sites with the most potential and carry out environmental site assessments. Since many of these properties have title issues or are owned complex estate networks, CRH staff will carry out legal investigations of each potential property to track down owners, or lack of. Considering the residential nature of large parts of the target areas, as well as the presence of conglomerated blight that often occupies entire city blocks, lead-based paint and asbestos assessments are also planned. The contemplated Phase I, Phase II, and lead-based paint and asbestos assessments represent a significant part of the total program budget. The procurement process will be competitive and will include the publishing of notices and receipt of proposals.</td>
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| ii. Anticipated Project Schedule: Lead based paint, asbestos, and Phase I assessments will occur starting month six and shall conclude by month 12. |

| iii. Task/Activity Lead(s): The Community Involvement Coordinator/Community Environmental Lawyer and Legal Investigator |

| iv. Outputs: Up to 12 Phase I site assessments, up to four Phase four Phase II site assessments, and up to 30 lead-based paint and asbestos assessments |

### Task/Activity: Reuse Planning

<table>
<thead>
<tr>
<th>i. Project Implementation</th>
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<tbody>
<tr>
<td>The CRH will proceed with market viability, evaluation of market viability, and site reuse visions for sites of high potential, including those priority sites depending on the results of their respective environmental assessments.</td>
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</table>

| ii. Anticipated Project Schedule: Market viability studies and evaluation of market viability studies will begin on month 12 and Site Reuse Visions on month 18. All activities will be completed by month 24. |

| iii. Task/Activity Lead(s): Community Involvement Coordinator/Community Environmental Lawyer/Technicians |

| iv. Outputs: Five market viability studies, five evaluations of market viability, and three site reuse vision plans. |

### 3.b. Cost Estimates and Outputs

The CRH has prepared the following breakdown of cost estimates after consultation with various suppliers, private environmental assessment firms, and its experience.

- **General Management**
  - *Office supplies and photocopies*: $2,100 for publication materials, general office supplies, photocopies, printer ink, printer repair, computer accessories, tablets, printed materials, and general office supplies per year for two years = $4,200.

- **Task 2: Community Involvement**
- **Personnel:** CRH Technician, who will coordinate outreach, engagement, and mobilization efforts with Partners. Outreach Technicians are a common feature of the CRH’s work in any given community, carry out on-the-ground data collection, coordinate door-to-door outreach, and organize community outreach. Over two staff at 10 hours per week at $17 an hour for two years = $35,360.
- **Travel:** Millage at 56 cents per mile for an estimated 6,343 miles during the project duration = $3,552.08; In the case of the island-municipality of Culebra, additional transportation at $90 a trip, one trip per month for 24 months = $2,160; board for overnight stays for Culebra field work at $150 a night, 48 nights during the entire two year term = $7,200; per diems for 48 nights work of overnight stays in Culebra at $40 per night = $1,920.
- **Other:** License for GIS platform and community mapping database management software (premium licenses) at $80 a month for 24 months = $1,920.

- **Task 3: Assessment**
  - **Personnel:** Legal investigator, who will be a paralegal or entry-level attorney, who will carry out extensive research on properties’ complex title issues as well as channel potential brownfields through their respective city code-enforcement programs. At $20 an hour for 15 hours a week for 24 months = $31,200.
  - **Contractual:** up to 30 lead-based paint and asbestos at approximately $1,000 each, 12 Phase I sites at approximately $2,500 each (two of which for petroleum sites) and up to four Phase II site assessments at approximately $22,000 each = $148,000.

- **Task 4: Reuse Planning**
  - **Contractual:** five market studies at $20,000 each, five market viability evaluations at $10,000 each, and three site reuse vision plans at $30,000 each = $240,000.

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<tr>
<th>Budget Categories</th>
<th>Project Tasks</th>
<th>Task 1: Management</th>
<th>Task 2: Community Outreach</th>
<th>Task 3: Assessments</th>
<th>Task 4: Reuse Planning</th>
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<td>$240,000.00</td>
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<tr>
<td><strong>Total Direct Costs</strong></td>
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<td>Indirect Costs</td>
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<td><strong>Total Budget</strong></td>
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<td>$188,160.00</td>
<td>$252,000.00</td>
<td>$499,287.68</td>
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3.c. Measuring Environmental Results
The CRH will measure and report the outputs included in section 3.a.i of this proposal through quarterly progress reports. Most importantly, the number of lead-based paint and asbestos, Phases, I and II environmental assessments executed as well as the planning reports published will represent the bulk of environmental output measurements. It will not be until the potential brownfields inventory is collected that the CRH will have an idea of exactly how many brownfield sites are available.

Funding will also provide target areas with their very first community inventories, finally allowing communities, public officials, business, and fellow non-profits to take a look into the brownfield site redevelopment potential of their vicinity. The proposed activities yield the potential to leverage funding from entities that otherwise would have never invested in revitalization, make ready acres of former actual or perceived contaminated sites, generate jobs, and minimize exposure to hazardous substances and petroleum contamination. Many of these outcomes will not be available until after the grant period, and their scope is difficult to measure until an actual assessment is carried out.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE
4.a. Programmatic Capability
4.a.i. Organizational Capacity

The CRH is a 501(c)(3) non-profit organization in total compliance with Commonwealth Act 164 and in Good Standing with the Puerto Rico Department of State. It is administered on a day-to-day basis by an Executive Director and supported by one in-house attorney, three paralegals, eight technicians, and an administrative assistant. In summary, the CRH is fully capable of executing the proposed project. Finally, the CRH has experience as a subcontractor for the EPA’s Brownfields Technical Assistance Grant and has assisted numerous communities with Targeted Brownfields Assessments.

The CRH is Puerto Rico’s leading experts on Commonwealth and municipal blight, nuisance, and eminent domain policy and law, and provides technical assistance to local governments and other non-profits on re-use strategies. Knowledge of local municipal, nuisance, and property law is crucial to maximize the EPA’s investment in Brownfields activities in Puerto Rico, especially considering the island’s adherence to its Spanish civil law tradition, title issues, and often complex proprietary rights. The CRH’s Executive Director is also author of Puerto Rico’s only judicial review of nuisance law titled, “Public Nuisances in Puerto Rico” published in the University of Puerto Rico Law Review in 2018 and recently published with the Federal Reserve “People Without Homes, Homes Without People”: Abandoned Properties as Opportunities for Affordable Housing in the Post-Disaster Reconstruction Environment”. Finally, the CRH was invited by Puerto Rico’s legislature to present expert testimony for local legislation regarding municipal law, Community Land Banks, relocation housing, and eminent domain.

The CRH has ample experience in planning and capacity building geared towards increasing communities’ abilities to leverage abandoned and vacant properties (including brownfields) to achieve increased resiliency, affordable housing, and participation in public decision making. Its entire methodology is based on community inventories, consultation, the identification of needs, and addressing said needs with available vacant and abandoned properties. In the present, the CRH has been assisting five local governments facilitate community planning models aimed towards the city’s recuperation from Hurricane María and its ability to withstand future environmental, economic, and social challenges.

4.a.ii. Organizational Structure

The CRH is a 501(c)(3) non-profit organization with a Board of Directors as its governing body. It is administered on a day-to-day basis by an Executive Director who has previous professional experience as grant administrators and is familiar with the technical, administrative, and financial requirements of the project and grant. The CRH has proven its capacity to assure the timely and successful expenditure of funds and the completion of all technical, administrative, and financial requirements of the program.

4.a.iii. Description of Key Staff
Key CRH staff are as follow:

- Luis Gallardo, MPA/JD, Executive Director, assumes primarily CRH’s legal and policy affairs. With expertise in municipal law and public nuisance law, Luis has a Bachelor’s in Sociology, a Master’s in Public Administration with a concentration in City Management, and a Juris Doctor. Luis was also the former Urban Development Director for the Municipality of Aguas Buenas and former Community Development Director for Opelika, Alabama, overseeing implementation of downtown rehabilitation strategies and implementation of numerous federal grants.

- Michelle Alvarado, esq, MA/JD, Community and Environmental Attorney for the CRH will assume the role as principal support staff for this grant. Throughout her career, she has worked for access to environmental justice, engaging in participatory action research with several environmental and community-based organizations, as a volunteer, university professor, spokesperson for the environmental pro bono program of the University of Puerto Rico, and as a public servant. Alvarado is a former Fellow of the American Bar Association, Section of Environment, Energy and Resources Program. For close to five years, she served as an Administrative Judge for the Puerto Rico Department of Natural and Environmental Resources.

4.a.iv. Acquiring Additional Resources

The CRH key staff are familiar with non-profit procurement procedures and best practices and have sufficient administrative ability to acquire any additional expertise and resources required to successfully complete the project. Most importantly, the CRH has an internal procurement procedure with federal funding in accordance with 2 C.F.R 200.

4.b. Past Performance and Accomplishments
4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance
4.b.ii.1. Purpose and Accomplishments

Recently the CRH was awarded with a Environmental Justice Collaborative Problem-Solving (EJCPS) Cooperative Agreement from the EPA for $200,000. The CRH has also been awarded from the United States Department of Agriculture the Rural Placemaking Innovation Challenge (RPIC) Grant ($171,295) and the Rural Community Development Initiative (RCDI) Grant ($89,661.00) which are also in their initial phases. The CRH is currently administering a multi-year $350,000 Ford Foundation grant to provide technical assistance to communities and local governments, $38,000 from Puerto Rico’s Interest on Lawyers Trust Accounts (IOLTA) fund for the provision of legal services to low-income communities; $30,000 from Citi Development for the production and dissemination of training literature for communities and local governments; and $30,000 from the Segarra Boerman and Children Foundation for support for low-income communities. The CRH has also acted as the fiscal sponsor of over $250,000 for community-based groups throughout Puerto Rico.

4.b.ii.2. Compliance with Grant Requirements

All of the above grants are still active. The CRH has effectively complied with or surpassed all reporting agreements and deliverables. The CRH is able to successfully manage these grants utilizing clearly defined activities, realistic metrics, and a highly effective team. In addition, the CRH Board of Directors has put into place sound procurement controls and an Internal Regulation for the Administration of Federal Funding and has audited 2020 financials to prove sound financial controls.
Description of community involvement

(Chapter 8 of the Center for Habitat Reconstruction
Internal Controls for the Management of Federal Funds)

Section 8.1 - Inclusiveness

The activities of civil engagement will be inclusive and recognise all peoples from the community. All voices will be valued, there will be no discrimination based on national origin, familial status, age, sex, gender, race, functional diversity, religion or creed.

Section 8.2 - Clarity

All activities related to community engagement will establish the purpose and scope to allow a more effective citizen participation. Efforts will be made to maximize access for all meetings and literature, including to individuals with functional diversity and the elderly, providing documents with large, clear print, and presentations and literature which will be read aloud upon request. The literature will be made available in plain language to ensure that the intended message is being communicated.

Section 8.3 - Methods

There will be a variety of methods used for engaging with the communities that range to the traditional from in-person meetings or assemblies to gather views, ideas and insights. Excluding purely internal or administrative meetings, informative meetings will be open to the general public and reasonable accommodations made upon request. In addition, social networks will be utilized to maximize reach for said invitations and digitized copies of presentations and meeting materials made available for individuals unable to attend meetings. The methods would allow to inform the community and to support a co-creation process. The choice of methods must reflect goals, time, budget, the issue at hand and the context.

Section 8.4 - Accessibility

The physical spaces that are chosen for citizen engagement will always be in neutral areas and allow access for people with functional diversity. How each physical space is chosen will depend on the characteristics of the space to accommodate the processes needed for the success of the activities (e.g. plenary and breakout small groups discussions). Enough time for each citizen engagement activity will be provided.

Section 8.5 - Public Relations and Outreach

The announcement of the activities of citizen engagement will be made through various methods, including, but not limited to, door-to-door flyers, placed in visible locations, social media, and community boards, as well as extended to neighborhood associations, and community groups, with emphasis on those representing marginalized populations.
Section 8.6 - Complaints

CRH engagement activities will provide a suggestion email and/or telephone number in order for citizens to voice their concerns and complaints. Retaliatory action will not be permitted against anyone making a complaint. If the investigation reveals that the complaint is valid, prompt action will be taken to stop its recurrence. Activities involving housing where the Fair Housing Act applies will feature notices with reference on how to file a FHEO complaint. Likewise, citizens will be encouraged to refer civil rights complaints to the Department of Justice's Civil Rights Division, and employment discrimination complaints to the U.S. Equal Employment Opportunity Commission.

Section 8.7 - Compliance with Federal Laws

CRH and its citizen engagement activities will comply with the Fair Housing Act, Civil Rights Act, Equal Opportunity and other federal laws that prohibit discrimination based on national origin, familial status, age, sex, gender, race, disability or religion.
Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.
CENTRO PARA LA RECONSTRUCCION DEL

Sincerely,

[Signature]

Director, Exempt Organizations
Rulings and Agreements
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Sincerely,

[Signature]

Director, Exempt Organizations
Rulings and Agreements
Discussion on named contractors and subrecipients; or an affirmative statement that a contractor/subrecipient has not been procured/named

Statement: Contractor/subrecipients have **not** been procured at this moment. Procurement will be done in accordance with the CRH Internal Controls for the Management of Federal Funds, which has been attached for reference, as well as EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements.