

Brownfields Assessment Grant Narrative 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

\$500,000.00

3. Locations

A. Vega Baja, Puerto Rico

B. Toa Baja, Puerto Rico

C. Orocovis, Puerto Rico

4. Target Area and Priority Site/Property Information

A. The Cabo Caribe Industrial Park, intersection of PR-6172 and Calle 1, Vega Baja, PR

B. María Libertad Gómez School, intersection of Paseo Azalea and Calle Aldila, Toa Baja, PR.

C. Former Uniform Factory, intersection of Calle Juan de Rivera y Santiago & Calle Martín Barry, Orocovis, PR.

5. Contacts

Project Director

Luis Gallardo - (787) 396-6606 - gallardo@crhpr.org

116 Calle Manuel Domenech Unit #644 San Juan, PR 00918

President

Belinés Ramos - (939) 218-7259, belines.ramos@upr.edu

116 Calle Manuel Domenech Unit #644 San Juan, PR 00918

6. Population

A. Vega Baja, Puerto Rico - 53,684

B. Toa Baja, Puerto Rico- 72,783

C. Orocovis, Puerto Rico- 21,229

7. Other Factors-

Sample Format for Providing Information on the Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1
The priority site(s) is impacted by mine-scarred land.	
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).	1-2
The priority site(s) is in a federally designated flood plain.	2-3
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.	3-5
30% or more of the overall project budget will be spent on eligible reuse/areawide planning activities, as described in Section I.B., for priority site(s) within the target area.	8
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.	

8. Letter from the State or Tribal Environmental Authority

See attached.

9. Releasing Copies of Applications

N/A



GOVERNMENT OF PUERTO RICO
DEPARTMENT OF NATURAL AND ENVIRONMENTAL RESOURCES

NOV 09 2023

Mr. Luis Gallardo Rivera
Executive Director
Centro para la Reconstrucción Del Hábitat Inc.
220 calle Manuel Domenech #644
San Juan, PR 00918

Dear Mr. Gallardo Rivera:

ACKNOWLEDGMENT LETTER FOR THE INTENTION TO APPLY FOR FY-24 US EPA BROWNFIELD'S PROGRAM FOR A COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT FOR CENTRO PARA LA RECONSTRUCCIÓN DEL HÁBITAT AT THE COMMUNITIES OF OROCOVIS, TOA BAJA Y VEGA BAJA PUERTO RICO

The Department of Natural and Environmental Resources (DNER) Superfund Program has received a letter from the Centro para la Reconstrucción del Habitat Inc. informing us of its intention to apply for a Community-Wide Brownfields Assessment Grant for FY 2024. DNER acknowledges and supports the initiative taken by the organization.

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

If you have any questions, please feel free to contact Edwin O. Malavet-Santiago, Environmental Emergencies Response Area Manager, at (787) 999-2200, extensions 5900, 5915 or by email at edwin.malavet@drna.pr.gov.

Cordially,

Anaís Rodríguez Vega
Secretary


EOMS/MAG

NARRATIVE CRITERIA

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area:

The Center for Habitat Reconstruction (or CRH in its Spanish acronym) will be carrying out community assessment in three separate target areas in the U.S. Territory of Puerto Rico. Each of these municipalities have existing agreements with the CRH for the creation of community-focused code enforcement and blight-reduction programs, and represent a diversity of Puerto Rican communities (coastal, urban, and rural). The target areas are as follows: **Municipality of Vega Baja** – Once a busy industrial town, its Cabo Caribe region was a key part of Puerto Rico’s sugar industry. Later, the Cabo Caribe Industrial Park was a bustling source of local jobs. Nevertheless, the exit of manufacturing in Puerto Rico resulted in the abandonment of dozens of properties. Part of Cabo Caribe is located within a floodplain. Population: 53,684. **Municipality of Toa Baja**- Is situated along the northern coast of Puerto Rico and part of the San Juan-Caguas-Guaynabo Metropolitan Statistical Area. The municipality was influenced primarily by agriculture, particularly sugarcane cultivation. Toa Baja was one of towns most affected by Hurricane María, with half of its area falling within flood zones. Population: 72,783. **The Municipality of Orocovis**-located in the central mountains of Puerto Rico, and is closely tied to agriculture, particularly coffee cultivation, this factor also makes the municipality prone to landslides, and other environmental hazards, affecting both natural ecosystems and built infrastructure. Population: 21,229.

Collaborations in previous years have produced surveys of vacant and abandoned properties, the identification of possible environmental and health risks, and implementation of a participatory code enforcement program. In Vega Baja, the CRH has identified 1,071 blighted properties, in Toa Baja 1,192 and in Orocovis 225. In the case of Vega Baja, for example, common risks identified include 55% accumulation of garbage, 26% with rubbish deposits, 25% with mosquito hatcheries, 13% illegal dumping sites, 3% human waste, and 3% with oil spills. Though the target areas are not continuous, they represent part of a larger archipelago-wide and CRH-led strategy to combat abandonment, with Vega Baja and Toa Baja having a Community Land Bank (CLB) and Orocovis in the process of creating one.

ii. Description of the Priority Brownfield Site(s): Puerto Rico currently has the highest vacancy rates in the U.S., worsened by economic recession, mass migration, hurricanes Irma and Maria, and Fiona and has also been battered by the negative effects of COVID-19. Research shows a strong association between abandonment and negative health outcomes. The CRH presents the following proposal with the aim to carry out brownfield assessment and planning activities in three municipalities. Though environmental impact studies have yet to be carried out, the CRH has identified several 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 reuse through collaboration with the EPA’s brownfields programs. Despite most of

the inventory of vacant properties being single-family residential, the following have been identified due to their scale: **Site #1:** The Cabo Caribe Industrial Park, intersection of PR-6172 and Calle 1, Vega Baja. **Historic Use:** Former factories, including telecommunications equipment and ceramics. **Suspected Contaminants:** Heavy metals, solvents, PCBs, e-waste, and acids and bases. **Site #2:** María Libertad Gómez School, intersection of Paseo Azalea and Calle Aldila, Toa Baja. **Historic Use:** Former school, including kitchen and cafeteria. **Suspected Contaminants:** PAHs, grease and oil residues, asbestos, lead-based paint. **Site #3:** Former Uniform Factory, intersection of Calle Juan de Rivera & Calle Martín Barry, Orocovis. **Historic Use:** Former uniform factory. **Suspected Contaminants:** VOCs, heavy metals, PAHs, chlorinated solvents, textile dyes, asbestos, petroleum products.

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.

iii. Identifying Additional Sites: In the event that grant funds remain, the CRH has developed a comprehensive plan to identify additional sites for eligible activities within the outlined geographic boundaries. This plan leverages the extensive groundwork already completed by the CRH in mapping all abandoned properties across the target municipalities. To date, CRH has identified a total of 2,487 blighted properties within the Target Area, providing a robust pipeline for future projects, ensuring that there is no shortage of potential sites for remediation and redevelopment. The criteria for prioritizing these additional sites involve a meticulous evaluation of each property's potential impact on community revitalization, environmental improvement, and socio-economic upliftment. Priority will be given to sites located in underserved communities or disadvantaged census tracts, aligning with the mission to address inequities and foster positive change in areas that have been historically marginalized. This strategic approach ensures that remaining funds are utilized effectively, not only to mitigate environmental challenges but also to spur economic development and enhance the quality of life for residents in these communities.

b. Revitalization of the Target Area

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 require us to take full advantage of the island's massive inventory of abandoned properties. This proposal is entirely in line with the Vega Baja 2016 Territorial Plan (conservation of existing properties for balanced development, p. 12, as well as the need to address climate change in Cabo Caribe, p. 16) and the Toa Baja 2008 Territorial Plan, amended in 2016 (need to increase educational offerings, p. 123, as well as increase technological and scientific capacities, p. 128). Lastly, the Orocovis 2019 Territorial Plan is in line with the proposal (conservation of natural resources, p. 23 and to address contamination, conservation of existing properties, p. 54). Possible uses are many and should be in sync with each of the rural communities' contexts. In addition, each has or will have a CLB.

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. These activities will leverage current public infrastructure and provide much-needed economic development to the residents of the region. Likewise, the vision of reuse of the former school in Toa Baja could include a technical school, while the industrial buildings in Orocovis provide ample spaces, many of which can be developed into “loft” style housing opportunities. The latter, in turn, will assist Orocovis in addressing its housing shortage as evidenced by the large number of CDBG-R3 recipients for the Relocation Program that cannot find homes. Nevertheless, as a potential brownfields site, marketing opportunities are limited.

ii. Outcomes and Benefits of Reuse Strategy: Multiple studies demonstrate 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.

The redevelopment of our priority sites will create affordable and sustainable housing, improve economic competitiveness of the region, create sustainable, commercial developments and jobs, and land recycling opportunities by remediating/reducing legacy pollution, and leverage current and future investments. EPA’s investment in brownfields in the region will also help meet Justice 40 goals by creating energy efficient, sustainable development, conserving and preserving greenfields, reducing erosion and pollutants and improving health by reducing exposure to contaminants, and turning idled brownfields into new hubs for the growth of the municipalities economies. These achievements will bring environmental justice for marginalized communities, as the funds will specifically benefit communities that are predominantly Hispanic, experiencing low income, high unemployment, distress, and facing disproportionate exposure to social and environmental injustices.

c. Strategy for Leveraging Resources

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 the proposed initiative 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 501(c)(3), it qualifies for additional brownfields funding and loans, Community Development Block Grants Disaster Recovery (CDBG-DR), CDBG Mitigation (CDBG-MIT), and Coronavirus Fiscal Recovery Funds (SLFRF), offers various examples of ideal public-sector funding opportunities. In addition, the CRH has recently created the Río Piedras Social Investment Fund in conjunction with the Río Piedras Development Trust, with the aim to develop affordable housing within Opportunity Zones utilizing private capital. This will definitely provide valuable experience and knowledge for the leveraging of future resources in Vega Baja, Toa Baja and Orocovis. Finally, the CRH has experience leveraging Community Reinvestment Act funding for its activities from banking institutions located both inside and outside of Puerto Rico, specifically for capacity building.

ii. Use of Existing Infrastructure: The CRH's 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 (electricity, city water and sewer, and telephone) as well as pre-existing 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 development, enabling residents the opportunity to work and live in close vicinity. All priority sites are located within urbanized areas with ample connection to main roads and routes.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding: Puerto Rico in recent years has suffered from a crisis of abandonment, as a local recession and emigration have left a mass of potentially contaminated vacant properties. Vacancy rates in Vega Baja, Toa Baja, and Orocovis were 22%, 20%, and 24% respectively. These are almost two 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 CRH 2022 survey, 60% of all the municipalities in Puerto Rico lack an established public nuisance program. 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.

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, the municipalities of Vega Baja, Toa Baja, and Orocovis all have a whopping high Demographic Index between the 96, 83, 92 percentile, compared to the U.S. average of 35. Per capita income is \$12,361 for Vega Baja, \$14,621 for Toa Baja and \$8,911 for Orocovis. 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, Census Bureau, Center for Disease Control, and the National Cancer Institute regarding the potential for addressing the following threats: **Health or Welfare of Sensitive Populations:** the activities proposed will allow for the identification of contaminated sites that are hazardous to public health and welfare. 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. **Promoting Environmental Justice:** The target areas not only include large pockets of poverty, but also hazardous activities that disproportionately affect the local populations (such as blight, abandoned industrial zones, and illegal dumping of potential hazards, among others). Assisting these communities with the elimination of environmental and health risks, will directly promote environmental justice.

b. Community Engagement

i. Project Involvement: The CRH employs a participatory approach as the central driving force for nearly every task within the project. Furthermore, it establishes formal agreements with various neighborhood associations, community-based non-governmental organizations, and municipalities with which it collaborates. In these three municipalities alone, the CRH has carried out dozens of community meetings during the past three years. 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 and municipal staff, residents will have the opportunity to learn how to identify the diverse range of brownfield sites in their target areas.

Ultimately once community listings are finished, 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 strategically selected by the community for environmental assessment, evaluation of market viability studies, market studies, and site reuse vision plans to further their RAU potential.

ii. Project Roles:

Name of organization	Point of contact (name, email & phone)	Specific involvement in the project or assistance provided
Municipality of Vega Baja	Veronica Bruno, vbruno@vegabaja.gov.pr , (787) 855-2500	<ul style="list-style-type: none"> ● Assist with community outreach (Task 2) ● Channel referred sites through the city’s code enforcement efforts (Task 3)
Municipality of Toa Baja	Anilda Fernández afernandez@toabaja.com (787) 261-0202	<ul style="list-style-type: none"> ● Assist with community outreach (Task 2) ● Channel referred sites through the city’s code enforcement efforts (Task 3)
Municipality of Orocovis	Edwin Berdecía eporocovis@gmail.com (787) 867-5000	<ul style="list-style-type: none"> ● Assist with community outreach (Task 2) ● Channel referred sites through the city’s code enforcement efforts (Task 3)

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

a. Description of Tasks/Activities and Outputs

Task/Activity: Community Involvement
<p>i. Project Implementation: 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 review each code enforcement program to identify those cases with potential hazardous and petroleum-contaminated brownfields sites, emphasizing areas surrounding priority sites. The CRH will also gauge each potential properties’ legal and ownership status to test viability for future acquisition by municipalities or their CLBs. 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. Communities will utilize available data for site selection and hang in on those properties with the potential to address each target area’s priorities, market needs, infrastructure, contamination, public health, and local ordinances.</p>
<p>ii. Anticipated Project Schedule: Continuous starting Q2 until Q 16.</p>
<p>iii. Task/Activity Lead(s): Coordinator and Technicians</p>
<p>Outputs: 9 community meetings and 3 community databases of potential brownfields.</p>

Task/Activity: Assessment

i. Project Implementation: After purging current community maps for potential brownfields, the CRH will further hone in on those sites with the most potential and carry out Phase I site assessments and for its largely residential inventory - lead based and asbestos testing. These will all be carried out within the context of each municipalities' pre-existing code enforcement program. 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 testing is a primary focus of this grant. The contemplated environmental 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.

ii. Anticipated Project Schedule: Continuous starting Q3 until Q12.

iii. Task/Activity Lead(s): Coordinator and Private Contractors

iv. Outputs: Up to 9 Phase I site assessments, up to 3 Phase four Phase II site assessments, and up to 77 lead-based paint and asbestos assessments.

Task/Activity: Reuse Planning

i. Project Implementation: The CRH will proceed with market studies and site reuse assessments for sites of high potential, including those priority sites depending on the results of their respective environmental assessments.

ii. Anticipated Project Schedule: Continuous starting Q9 until Q16.

iii. Task/Activity Lead(s): Private Contractors

iv. Outputs: 3 market viability studies and 3 site reuse vision plans.

b. Cost Estimates:

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

- *Coordinators:* Will coordinate outreach, engagement, and mobilization efforts with Partners and oversee contracting efforts for site-specific analysis. At \$20 an hour compensation rate is based on a private market analysis of three sources.
- *Field Technicians:* 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. At \$15 an hour compensation rate is based on a private market analysis of three sources.
- *Legal Investigator:* Will oversee title studies and legal research within the framework of municipalities' code enforcement and nuisance abatement programs. At \$20 an hour compensation rate is based on a private market analysis of three sources.

- *Fringe Benefits*: Based on 18% of personnel costs.
- *Travel expenses*: Based on \$600 per airfare, \$200 hotel per night, and per diem of \$75 per day, for regional educational convenings, based on previous experience.
- *Mileage and toll*: 65.5 cents per mile is based on the current IRS reimbursement rate.
- *Office supplies*: \$1,197.06 per year for four years, based on previous CRH experience.
- *Subscriptions for GIS services*: \$500 a year, based on previous experiences.
- *Phase I studies*: Based on area-based estimates at \$3,750 per study.
- *Phase II studies*: Based on area-based estimates at \$26,000 per large-scale study.
- *Asbestos and Lead-Based paint studies*: Based on CRH's experience at \$500 per study.
- *Market Study*: Based on lower-end EPA-provided estimates at \$15,000 per study.
- *Market Studies*: Based on area-based estimates at \$15,000 per study.
- *Site Reuse Assessment*: Based on area-based estimates at \$25,000 per study.

Budget Categories		Project Tasks			Total
		Task 2: Community Outreach	Task 3: Assessments	Task 4: Reuse Planning	
Direct Costs	Personnel	\$19,413.35	\$19,413.35	\$19,413.35	\$58,240.05
	Fringe Benefits	\$3494.21	\$3494.21	\$3494.21	\$10,482.62
	Travel	\$6,748.00	\$6,748.00	\$6,748.00	\$20,244.00
	Equipment	\$0.00	\$0.00	\$0.00	\$0.00
	Supplies	\$4,846.26	\$4,846.26	\$4,846.26	\$14,538.78
	Contractual	\$0.00	\$196,750.02	\$173,055.01	\$369,805.03
	Other	\$0.00	\$0.00	\$2,880.00	\$2,880.00
Total Direct Costs		\$34,501.82	\$231,251.84	\$210,436.83	\$476,190.49
Indirect Costs		\$1,725.091	\$11,562.59	\$10,521.83	\$23,809.52
Total Budget		\$36,226.9	\$242,814.43	\$220,958.67	\$500,000.00

c. Measuring Environmental Results: The CRH 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 schedules are not being met, the CRH 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, redevelopment complete, number of parcels and acreage made ready for greenspace/recreation, and leveraged funding. 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,

a final report will be provided to the EPA. After evaluation of sites is done, it is each municipalities' best interest that redevelopment happens, and as such, close monitoring of subsequent actions will be done diligently.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity: The CRH is in total compliance with Commonwealth Act 164 and in Good Standing with the Puerto Rico Department of State. In addition, it currently administers three federal grants, all in good standing with no incidents or findings. 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 Puerto Rico blight, nuisance, and eminent domain policy and law, and provides technical assistance to local governments and other non-profits on reuse 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 "*Abandoned Properties as Opportunities for Affordable Housing in the Post-Disaster Reconstruction Environment*".

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 or is assisting 18 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.

ii. Organizational Structure: The CRH is a 501(c)(3) non-profit organization with a Board of Directors as its governing body. Board members represent diverse backgrounds and areas of specialty, including community legal advocacy, city management, technology, property rights, and small business development. 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 federal grant management. In summary, 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.

iii. Description of Key Staff: Key CRH staff are as follows:

Luis Gallardo, Executive Director, assumes primarily CRH's 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 Community Development Director for Opelika, Alabama. Luis will act as Program Manager for this grant.

Coralys Rosado, Regional Coordinator currently assigned to oversee CRH community-based activities in this region. She has ample experience in case planning and management as well as

community work. Under the CRH, Coralys leads the design and execution process for the identification of blighted properties as well as code enforcement gaps on the municipal level. Coralys has a law degree and experience working in the U.S. Census and as a judicial law clerk.

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. The CRH has a tested curriculum and “bootcamp” designed for new recruits, allowing quick hiring, capacity building, and implementation of additional resources. Most importantly, the CRH has an internal procurement procedure with federal funding in accordance with 2 C.F.R 200, including a hiring plan.

c. Past Performance and Accomplishments

ii. The CRH has not received an EPA Brownfields Grant but has received Other Federal or Non-Federal Assistance:

Grant	Purpose and Accomplishments	Compliance with Grant Requirements
Environmental Justice Collaborative Problem-Solving (EJCPS)	To provide legal and planning services to communities in three municipalities. Accomplishments include signing MOUs with each of the municipalities to align city support to implement community plans.	The grant is still active. After Q2 (of 8), the CRH has spent 18% of its budget.
Rural Placemaking Innovation Challenge (RPIC)	To provide planning support to the La Playa community of Barceloneta in identifying and promoting new uses for abandoned properties within their neighborhoods. Accomplishments include inventorying 117 properties within La Playa.	The grant is still active and is in good standing. At Q7 of the grant (of 10) and has expended 37% of funding. Reporting has been timely and no corrective measures are pending.
Rural Community Development Initiative (RCDI)	Provide technical and legal support to two municipalities to create nuisance abatement programs. Accomplishments include creating two programs, inventorying 224 properties.	The grant is still active and is in good standing. The CRH is in its Q5 of the grant (of 12) and has expended 40% of funding. Reporting has been timely and no corrective measures are pending.