R02-20-A-024

IV.D. Narrative Information Sheet

1. Applicant Identification:
   Municipality of Toa Alta
   PO Box 693
   Toa Alta, PR 00954

2. Funding Requested:
   a. Assessment Grant Type: Community-wide
   b. Federal Funds Requested:
      i. $300,000
      ii. We are not requesting a Site-specific Assessment Grant waiver of the $200,000 limit.
   c. Contamination: Hazardous Substances ($150,000) and Petroleum ($150,000)

3. Location:
   a. Municipality of Toa Alta
   b. Toa Alta
   c. Puerto Rico

4. Property Information for Site-Specific Proposals: Not applicable

5. Contacts:
   a. Project Director:
      Ms. Aurea Cintrón Nieves
      Director of Federal Programs
      787-870-1350
      acintron@ciudadtoaalta.com
      PO Box 693
      Toa Alta, PR 00954

   b. Chief Executive/Highest Ranking Elected Official:
      Hon. Clemente Agosto Lugardo, Mayor
      787-870-2100
      cagosto674@gmail.com
      PO Box 693
      Toa Alta, PR 00954

6. Population: Census Tract[1] (5103) containing priority sites: 1,614. Population for the Municipality of Toa Alta: 74,169 (2013-2017 American Community Survey 5-Year Estimate

[1]Because Applicant is a municipality (similar to a county), population data is reported in census tracts in which each priority site is located.

7. Other Factors Checklist:

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.	
The priority brownfield 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).	Pages 2-3
The priority site(s) is in a federally designated flood plain.	Page 2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	Pages 3-4
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	

[1]Because Applicant is a municipality (similar to a county), population data is reported in census tracts in which each priority site is located.

GOVERNMENT OF PUERTO RICO
Department of Natural and Environmental Resources

NOV 07 2019

Hon. Clemente Agosto-Lugardo
Mayor
Municipality of Toa Alta
PO Box 82
Toa Alta, PR 00954

Dear Mayor Agosto-Lugardo:

MUNICIPALITY OF TOA ALTA ACKNOLEDGEMENT LETTER FOR THE INTENTION TO APPLY FOR FY-20 US EPA BROWNFIELD'S PROGRAM FOR A COMMUNITY-WIDE BROWNFIELD HAZARDOUS SUBSTANCES AND PETROLEUM ASSESMENT GRANT

The Department of Natural and Environmental Resources (DNER) Superfund Program has received a letter from the municipality of Toa Alta informing its intention to apply for a Community Wide Brownfields Hazardous Substances and Petroleum Assessment Grant. 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) 767-8181, extensions 2400, 2401 or by e-mail at melvinmenendez@jca.pr.gov.

Cordially,

Tania Vázquez Rivera, Secretary

MMF
MMF

c Teresita Rodriguez , USEPA

IV.E. NARATIVE/RANKING CRITERIA

***IV.E.1 Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i. Background & Description of Target Area*:** The Municipality of Toa Alta (Municipality) is situated in the central region of Puerto Rico (PR), approximately 30 miles west of San Juan. Founded in 1751, Toa Alta is one of the two oldest towns in PR. For over 200 years, our economy was based on agriculture and livestock farming. Then, beginning in the 1970's, economic growth moved towards industrialization that 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, and drove PR into a deep recession that remains today and has led to job losses and population decline as people left Toa Alta for the US mainland in search of employment. Those fortunate to have employment are paid less relative to the cost of living. While Toa Alta residents have seen a modest increase in household income (adjusted for inflation) of 11.5% (US Census) since 2007, the cost of living has increased 18% over the same period. Today, due to lack of employment opportunities in Toa Alta, 85% of our residents commute to jobs outside of the Municipality, leading to a sharp decline in retail commerce and commercial development. Significant competition from modern shopping centers outside Toa Alta has drawn potential customers away from our municipality, slowing and in some cases, halting our revitalization efforts.

In September 2017, hurricanes Irma and Maria ravaged Toa Alta, adding extreme socioeconomic and financial pressures to our already strained municipality. Maria's devastating winds and torrential rains caused catastrophic flooding of the La Plata River, damaged/destroyed all electric power and drinking water services, 1,500 homes, and over 100 commercial/industrial properties (many of which are now brownfields), potentially releasing chemicals, lead paint, petroleum, and other hazardous substances into the environment. 40% of commercial properties, nearly 100% of municipally owned structures, and an estimated 30% of the transportation infrastructure was damaged.

The storms followed a decade-long economic slide that included business closures, population loss, and abandoned homes. Even before the hurricanes (2010 to 2017), the number of residential housing units in the Toa Alta Urban Zone had dropped 15%, and the number of vacant housing units increased by 17% (US Census). After Maria, the population dropped another 14% (Center for Puerto Rican Studies, City University of New York) as residents migrated to the US mainland for better employment opportunities rather than return to their shattered lives in Toa Alta. We continue to suffer through a difficult job market with dozens of employers unable or unwilling to reopen businesses after Maria, driving our current unemployment to 6.1% compared to 3.5% in the US (9/19, Bureau of Labor Statistics). These challenging conditions have resulted in many abandoned brownfields in our municipality as businesses closed and slowing the progress on older brownfields as resources have been reallocated to more urgent needs.

As industrial employers shuttered their doors after the 936 exemption repeal and hurricanes marred our community, brownfields have steadily become more prevalent in Toa Alta. We have selected the worst-hit area (Former Industrial Zone (FIZ)) to be our target area where grant funding will have the greatest impact. A focused effort has been made to invest in the FIZ, creating detailed reuse plans to maximize investments and leverage additional funding. If properties outside the target area become high priority during the cooperative agreement period, we may choose to invest grant funding on them as well; however, the redevelopment focus for this grant will remain the FIZ.

The FIZ – At 35 acres, the FIZ (Census Tract 5103) is in the heart of Toa Alta's urban core. Approximately 30% of our municipality's population lives within 2.5 miles of the FIZ. It is adjoined by two major Puerto Rican highways (PR-861 & PR-165) and is a highly visible area of our community. The FIZ was once a regional employment center, with approximately 300 workers earning competitive wages at its peak of operational activity. However, FIZ businesses closed forcing residents into financial despair. Income is more than 2.5X less that of the US ($21,172 vs. 57,652 Median Household Income (MHI) per the US Census 2017 American Community Survey (2017 ACS)), and poverty is 3.5X greater in the FIZ than the nation (50.5% vs. 14.6% respectively (2017 ACS)). Municipality officials also state that today, criminal activity in the FIZ is 2X more common than in the remainder of Toa Alta. Due to months of power outages, lack of workforce, and financial resources, many area

businesses were unable to reopen. Businesses such as the TII Industrial, several manufacturing facilities, and a local gas station have closed and eliminated over 300 jobs. This left many target area residents searching for adequate income and living among empty, dilapidated properties.

***IV.E.1.a.ii. Description of the Priority Brownfield Site(s)*:** Toa Alta's economic decline described above resulted in an abundance of brownfields. The FIZ has a significantly higher concentration of brownfields compared to the rest of our community with the highest priority sites listed in Table 1 offering the greatest opportunity for successful redevelopment. For example, the TII Industrial is in a dilapidated condition, with potential hazardous chemicals impacting the FIZ, residents, and the adjoining La Plata River. Reuse as a university will fill a critical need after the devastating impacts of the hurricanes, making this site one of our highest assessment and reuse priorities. Although we have worked hard to address brownfields, dozens remain, including closed gas stations and former industrial properties, that force already financially stressed residents to suffer through the blight that remains. The historical uses of our priority sites, likely environmental issues, and potential health effects on those exposed to these uncontrolled sites are summarized in Table 1 below.

Table 1 Priority Sites, Size & Proximity to Target Area Residents/Near Water Body	Historic Use/Current Use & Condition/Current Owner/Planned Reuse (further discussed in Section IV.E.1.b.i.)	Suspected Contaminants*
1. Vacant Manufacturing Site – ±1.5 acres, adjoins low income & minority neighborhood	Industrial / vacant, deteriorating structure full of debris, heavily damaged by hurricane / Owned by Puerto Rico Industrial Dev. Co. / Future Low-Income Housing Development	metals, petroleum, VOCs, SVOCs, PAHs, PCBs, glycols, lead paint, asbestos
2. TII Industrial – ±1.6 acres, adjoins La Plata River/in river flood plain, elderly homes, & low income & minority neighborhood	Industrial / vacant, deteriorating structure full of debris, heavily damaged by hurricane / Owned by Puerto Rico Industrial Dev. Co. / Future University Campus	
3. Former Industrial Site #1 – ±2.6 acres, 500' from La Plata River, adjoins low income & minority neighborhood	Industrial / vacant, deteriorating structure full of debris, heavily damaged by hurricane / Owned by Puerto Rico Industrial Dev. Co. / Future commercial/retail	
4. Former Industrial Site #2 – ±1.3 acres, 350' from La Plata River/in river flood plain, adjoins low income & minority neighborhood	Industrial / vacant, deteriorating structure full of debris, heavily damaged by hurricane / Owned by Puerto Rico Industrial Dev. Co. / Future commercial/retail	
5. Former Gas Station - ±0.25 acres, adjoins low income & minority neighborhood	Gas Station / vacant, deteriorating structure, heavily damaged by hurricane. USTs believed to remain/Owned by GAMA Group / Future Cinema	VOCs, PAHs, metals, petroleum
**According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 1 pose a real threat 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).*		

These sites are our highest priorities because they meet immediate needs in our community, align with our revitalization plans, and redevelopment is imminent due to funding already committed ($11.3M in funding has already been secured to rebuild residential as well as commercial/retail assets on several target properties in the FIZ (IV.E.1.c.i)). Increasing our low income housing stock will help those hardest hit by job losses and the hurricanes and adding a new commercial and industrial development will improve job availability and encourage residents to work locally, keeping tax revenues in Toa Alta. 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, the likelihood of a successful redevelopment is much higher.

***IV.E.1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans*:** The 2012 Toa Alta Territorial Plan (Revitalization Plan) specifies the reuse of existing vacant and underutilized urban space (brownfields) as a key initiative, creating desperately needed low and moderate income housing, and modern commercial and industrial development throughout our municipality, but particularly in the FIZ. 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. We were beginning to put the pieces in place to implement a strategy of creating modern mixed-use development, commercial investment, and housing that balances social, economic and environmental interests in an initiative to create sustainable, lasting development. Then hurricanes Irma and Maria struck and the extreme logistical, financial, and physical toll that they levied on our community caused a significant setback. However, we are recovering and are now ready to get our Revitalization Plan back in motion.

Per our Revitalization Plan, we will expand/diversify our commercial sector, using brownfield sites to minimize the impacts of future employer cutbacks and closures and bring new employers and jobs to the community, reducing the number of residents who commute outside of Toa Alta to work, keeping income and sales tax revenues at home. The Revitalization Plan also identifies a need for low-income/affordable senior housing which is in very short supply, providing local housing options for residents. These activities will encourage people to return to Toa Alta from the mainland to participate in the reconstruction of our community and enjoy the benefits of the redevelopment.

Toa Alta is requesting $300,000, most of which will be used for Phase I and Phase II Environmental Site Assessments (ESAs), providing the initial, highest risk investment necessary for brownfield redevelopment. Funding will also be committed to improving/reprioritizing a recently created inventory and conducting cleanup planning activities. This approach will maximize grant value and trigger further environmental and redevelopment work with other funding as noted in IV.E.1.c.i. For example, plans are underway to redevelop the Vacant Manufacturing Site into low income housing, critically needed after Irma and Maria damaged and destroyed so many homes. Putting redevelopment resources in the heart of the target area will maximize the likelihood of successful growth and development of this struggling area of our community. EPA-funded assessment of the former gas station site (#5 above) and redevelopment into a cinema will help leverage funding for its revitalization and create an important commercial development in an area where redevelopment success is badly needed. Development on the Former Industrial Sites #1-2 will add much needed commercial & retail space along the heavily traveled PR165 & 861, creating short term construction jobs and many permanent jobs. Returning the TII Industrial facility to reuse as a university (Ana G. Méndez University System) will create high paying jobs and provide advanced education opportunities for Toa Altans, empowering them to build a better life for themselves and future generations.

***IV.E.1.b.ii Outcomes & Benefits of Reuse Strategy*:** Reuse of brownfields will generate higher tax revenue for the Municipality. All 5 priority sites are located in an Opportunity Zone (OZ), making the redevelopment of these sites attractive to investors. Currently, at least 2 Opportunity Funds have been established and are making investments in Puerto Rico (Puerto Rico Opportunity Fund & Wefunder Puerto Rico Opportunity Fund), and we will work with these funding resources and developers to further facilitate investment in our brownfields. Through increased investment, jobs will be created, new residential units will be constructed, and property values will be enhanced. Sites located in OZs will be marketed as such, ensuring that OZ investors are aware of the value brownfield reuse brings. Based on previous, similar development projects in our community, the full development of all Table 1 sites will create over 250 jobs and an estimated $500K in annual tax revenue. Using these sites as examples, this success story can be duplicated on other sites in the community. For example, reuse of the TII Industrial will remove the stigma associated with environmental contamination (metals, petroleum, VOCs, SVOCs, PAHs, PCBs, glycols, lead paint, asbestos, etc.). Blight will be eliminated, removing the lure for crime that the abandoned property invites. This site could again become a viable asset to the community once it's redeveloped into a university. Temporary jobs would be created through construction work to remediate and redevelop the site, eliminating an environmental threat to the adjoining river. As brownfields are redeveloped, employment and revenue losses will be reversed, and economic growth will permeate the community. Brownfields reuse will create high value jobs (estimated 250+ in the FIZ), affordable housing (estimated 250 units on the Vacant Manufacturing Site), and a cinema (former gas station), all important needs outlined in the Revitalization Plan. New, energy efficient construction on the priority sites will reduce energy usage and operating cost on sites where new construction is planned (new construction is planned for all priority sites), which will create jobs, repatriation, and increase wages for Toa Alta residents.

Assessment, remediation, and redevelopment will result in new commercial/residential mixed-use development, new housing, and new industrial business. New, low income and elder care housing will be developed, creating safe, affordable residential options (estimated 250 housing units) and eliminate threats to less fortunate and vulnerable residents such as the poor, elderly, and children. These developments will improve the local economy through job creation, adding over 250 jobs (IV.E.1.b.ii) which will reduce poverty. Brownfields reuse increases tax revenue (estimated $500K annually) which in turn, improves public services. Brownfield assessments will be linked to successful redevelopment

with positive outcomes such as eliminating contaminant exposure pathways, especially in areas of low income and minority populations, creating equitable, affordable housing; improving economic competitiveness of the target areas; creating sustainable, mixed-use developments and land recycling opportunities; leveraging current and future investments; and creating unique, healthy, and safe neighborhoods. Residents and commercial property owners will benefit from increased property value, improved energy efficiency, and lower maintenance costs associated with new construction.

Health indicators such as the increased cancer (e.g. liver cancer) and infant mortality (IV.E.2.a.ii(2)) will no longer be influenced by environmental impacts caused by FIZ brownfields. This will be accomplished in areas where low income and minority populations are highly concentrated, supporting environmental justice goals. Investment dollars have already been identified to help complete the reuse of target area properties as indicated in IV.E.1.c.

IV.E.1.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: Target area redevelopment funding is secured for 3 priority sites (Vacant Manufacturing site & Former Industrial Sites 1 & 2). Private sector funding pledges to construct housing on the Vacant Manufacturing site ($8.2M) and commercial/retail on the Former Industrial Sites #1-2 ($3.1M) will be invested in site construction when due diligence eliminates the risk of the environmental unknowns. In addition, Toa Alta is eligible for and will seek additional funding from the following sources: EPA Brownfield Clean-up grant funding, US Dept. of Agriculture, CDBG, CDBG-DR (Disaster Relief), FEMA, US Economic Development Administration (USEDA), Dept. of Transportation grants, and new funding opportunities/incentives available in the future. Funding from these resources are available for remediation, demolition, site development, public infrastructure improvements, streetscape improvements, building rehabilitation, and job training, etc., to encourage and complete our reuse strategies. Toa Alta is already pursuing FEMA funding to demolish the Vacant Manufacturing Site, Industrial Site #1-2, and the TII Industrial Property. Should EPA funds be awarded for environmental assessment, the EPA grant may qualify as the required match to CDBG-DR funding, further leveraging funding resources to successfully redevelop brownfields. FEMA funding will be sought to help develop housing on the Vacant Manufacturing Site properties as well.

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), Federal Emergency Mgmt. Agency (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 for brownfield sites/areas as assessment projects develop. Each site will have a unique funding plan due to individual status and eligibility.

***IV.E.1.c.ii. Use of Existing Infrastructure*:** Because the highest priority sites are located in a compact area, and because some investment through new development has been made in the target area, modern infrastructure already exists. Power lines and roads damaged by the hurricanes have since been repaired in the FIZ. Our utility infrastructure can handle the added capacity for the planned redevelopment. With revitalization ranging from residential to commercial, existing infrastructure will allow for easy access to developers and enable residents the opportunity to work and live in the same neighborhood. Redevelopment will utilize existing infrastructure such as roads, curb cuts, nearby utilities, and commerce along heavily traveled PR-165 and PR-861 to attract new investment in area brownfields, reducing redevelopment costs of these sites. If additional infrastructure is needed, we will utilize a combination of local funding, when available, CDBG, US Dept. of Transportation Better Utilizing Investments to Leverage Development (BUILD) Grant program, and FEMA funds to meet the development's infrastructure needs.

***IV.E.2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding*:** Toa Alta does not have the funds to complete this work in our general budget. The

only viable resource we have to address brownfields and redevelop these sites is federal funding. Our economy has experienced over a decade of setbacks, resulting in significant economic decline, and culminating with the devastation wrought by hurricanes Irma and Maria. Fewer jobs, reduced tax revenues, repairs to damaged municipal buildings and infrastructure, and hurricane debris cleanup has further limited local government resources. In Puerto Rico, income tax is paid in the Municipality within which a person works, not where they live. Therefore, because 85% of our residents work outside of Toa Alta, tax revenue in our community is very low. Our municipality operates on a $18M annual budget, which can't fully fund essential services, let alone allow us to invest in much needed infrastructure repair and maintenance. Simply collecting debris from the hurricanes exceeded $8.5M. Brownfield sites add to the financial burden borne by target area residents by suppressing residential property values, further adding to municipal expenditures through reduced tax base and additional public safety services to brownfield sites for criminal activity as indicated by the 2X higher crime rate in the FIZ compared to Toa Alta as a whole. Because of the decade long, island wide recession capped by the destruction from Irma and Maria, the territorial government also lacks resources to commit to brownfields redevelopment. Moreover, local governments in PR don't have funding resources commonly available to local governments on the mainland (e.g. Tax Increment Financing). Incentivizing reuse through funding of environmental due diligence is attractive to developers, but we have no tools available at a local or territorial level.

***IV.E.2.a.ii. Threats to Sensitive Population, (1) Health or Welfare of Sensitive Populations*:** Toa Alta has a very high population of minorities and poor. This is even more evident in the FIZ, where nearly 100% of the population is minority, and over half live in poverty. Other sensitive populations are also impacted. 36.9% of the FIZ residents are children or the elderly, and 24.7% are disabled, twice the percentage of the US (12.6%). Contaminants such as metals, petroleum, VOCs, SVOCs, PAHs, PCBs, glycols, lead paint, and asbestos are potentially causing as yet unknown harm to these people, raising significant environmental justice issues. The result is the exposure of a large number of our less fortunate residents to soil, water, and air contamination present on these brownfields with little ability to improve their condition. For example, the TII Industrial site, located adjacent to a large, low-income, elderly housing complex and 250' from additional low-income housing, is potentially impacted with metals, petroleum, VOCs, SVOCs, PAHs, PCBs, asbestos, and other contaminants known to cause various cancers and infant mortality which are experienced by Toa Alta's residents at a higher rate than the nation (IV.E.2.a.ii(2)). The proximity of such a large number of brownfields to low-income neighborhoods in our target areas 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.

This grant will help our community better understand the environmental conditions at our brownfields and help reduce the risk of exposure, eliminate sources of contamination, improve the ecological health of our community, and incorporate livability and equitable development principles.

***IV.E.2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions*:** Sites such as the Former Gas Station, TII Industrial, Vacant Manufacturing Site, and Former Industrial Sites #1 & 2 are believed to be impacted by VOCs, SVOCs, PAHs, petroleum, and metals. Studies on the health effects of exposure to these contaminants have linked them to higher incidences of cancer. Toa Alta residents suffer from leukemia, the most common type of blood cancer found in children, at a rate of 13.9/100K which is 33% greater than the rate in PR. The former gas station is located within a residential area and petroleum and metals are known to affect the liver. A 32% greater occurrence of liver cancer is found in Toa Altans versus Puerto Ricans. Mercury, lead and other metals, VOCs, PAHs, and petroleum constituents are known to be a threat to unborn children and infants, and the infant mortality rate in PR is 25% higher than the US according to the CDC. Although infant mortality data is not available at the Municipality level, this data is believed to be representative of Toa Alta. Each of the five priority sites contains at least one of these contaminants, and every priority site adjoins low income neighborhoods potentially linking cancer directly to disadvantaged populations.

Currently, there are 29 properties in the Municipality that have environmental records in the EPA's EnviroFacts database. Because of their use of toxic chemicals and their inevitable impact on the environment near resident's homes, many operating commercial and industrial facilities add to the environmental threat. Removal of environmental contaminants at brownfields in our community will

reduce exposure of our residents, which will help to reduce the disproportionate incidences of disease and other poor health outcomes that disadvantaged populations are currently experiencing. The first step is assessment of the environmental conditions of FIZ brownfields. However, the Municipality simply does not have the funds available to invest in brownfields assessment. Funding from this EPA assessment grant will initiate the revitalization of the FIZ by providing that initial infusion of capital to clarify the environmental conditions of brownfields, reducing the hesitation of developers to invest in redevelopment in our community. The subsequent transformation of target area brownfields into productive residential and commercial properties will result in better overall health for the community.

IV.E.2.a.ii(3) Disproportionately Impacted Populations: 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 such as lead, VOCs, asbestos, PCBs, etc., resulting in an inability to improve or in some cases, maintain their health and wellbeing. Per the Urban Institute/Center on Society and Health (2015), low-income residents become sick more frequently and more quickly, and die at younger ages on average than those in more affluent communities. For decades, Toa Alta has suffered extraordinarily low wages and a very high poverty rate. The devastation left by the hurricanes has added unprecedented financial burden 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 also left a void in the community, especially in the FIZ. According to the 2017 ACS, 29.8% of Toa Alta residents live in poverty compared to 14.6% for the U.S. A staggering 50.5% of FIZ area residents live in poverty, including 66.9% of children. Unemployment in the FIZ (14.3% - 2017 ACS) is nearly 4 times the nation (3.7% per Bureau of Labor Statistics). Finally, the FIZ has an MHI of $21.2K, far less than the national figures ($57.7K) per the 2017 ACS. It is very clear that the residents in the target areas suffer dramatic wage disparities. The EPA's EJScreen tool indicates that the FIZ is in the 90-100th percentile of US citizens in close proximity to Superfund sites, Ozone pollution, and PM 2.5 pollution. Our impoverished and minority residents are at a distinct disadvantage, and there is little incentive for residents to maintain their own properties, let alone contribute meaningful change to their community, resulting in significant environmental justice concerns.

The EPA grant will reduce threats by funding environmental investigation work needed to trigger stalled redevelopment on priority sites. Adding new jobs and housing in the target area will create gainful employment for FIZ residents and safer living conditions. Increased employment, higher wages, and new development on brownfield properties will create a sense of pride and ownership of the neighborhood, incentivizing investment in other area properties. New tax revenue will be generated and subsequently reinvested in the community, multiplying investment in the FIZ.

***IV.E.2.b. Community Engagement, i. Project Partners & ii. Project Partner Roles*:** Several community partners have pledged a supporting role for our brownfields program (Table 2). This assemblage of community groups 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.

Table 2 – Project Partners

Partner Name	Point of Contact	Specific Role in the Project
Palacio Dorado Elderly Home. Executive Home Search Realty Services	Mrs. Ana Celia Pages apages@executivehomesearch.com 787-783-7122	Local retirement home management company – manages retirement home in the target area. They will advertise outreach & involvement opportunities on website
Ferdoc Distributor Top Trader's	Mr. Fernando Valledor, President 787-438-9201	Local industrial organization that will participate in community involvement opportunities, encourage industrial park members to be involved in reuse planning, give input on inventory & prioritization process
Mission Board Church	Jorge Rivera 787-475-7310	Local church that will participate in community involvement opportunities, provide meeting space, aid in site selection/prioritization
Community and Recreative Association Sector Marzan	Mrs. Julia Melendez 787-460-7249	Grass roots community group that will aid in community outreach, publicize community involvement opportunities, participate in inventory & prioritization process and aid in site selection/prioritization
Hacienda Rosado Ayala	Mr. José Rosado 787-870-1031	Local restaurant that will provide meeting space for community engagement events

***IV.E.2.b.iii. Incorporating Community Input*:** Toa Alta has a well-established culture of community involvement that we will maintain throughout implementation of this grant. Our most recent

community engagement event was held on November 21, 2019 to inform residents of the planned grant effort. Four to six public meetings will be held throughout the 3-year grant period to maintain stakeholder engagement and continue to gather input on site selection and prioritization, assessment needs, cleanup decisions, any mitigation measures from the cleanup and redevelopment activity, and reuse planning. Public meetings 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. Because Toa Alta has a significant non-English speaking population, we have multi-lingual personnel on staff who will interpret presentations and translate documents in Spanish and English. We've already begun engaging target area residents, business owners, and community advocates to solicit their input regarding our brownfield reuse projects and will continue to do so throughout the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals, initial 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 the engagement of these stakeholders. Regional developers will be contacted to bring awareness of the reuse opportunities the priority sites offer. When developers are identified, they will attend public meetings to describe their plans for redevelopment. Municipality staff will catalog stakeholder input for use as a reference when determining assessment and redevelopment priorities. As the project progresses, we will actively involve stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on site reuse. When stakeholder input is received, we will evaluate it against our development vision and available resources, adopting input that feasibly meets these criteria.

***IV.E.3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities and Outputs*:** Toa Alta will begin grant-related activities immediately upon award confirmation, working to prepare a Work Plan approved by the EPA PM/PO. Once the Work Plan is approved, we will select a Qualified Environmental Professional (QEP) in accordance with federal procurement regulations (2 CFR 200.317 - 200.326). The Municipality has begun developing a brownfield inventory and will use it as a tool to help accomplish brownfield reuse goals. Inventoried sites are 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. Brownfield redevelopment progress will be carefully tracked with regular entries into ACRES, public meetings, and coordination with the consultant. Toa Alta and its consultant will complete the following tasks:

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

i. Project Implementation: Municipality staff will travel to regional and national brownfields conferences/meetings, participate in calls, meetings, and correspondence between the Municipality, QEP, EPA, etc. to manage the grant's cooperative agreement. ACRES database will be updated quarterly or more frequently if needed. We will carefully track contractor costs, comparing to the budget, expenditures, and project progress. This will ensure that grant funds will be successfully utilized within the prescribed three-year project period. The Municipality, with QEP support, will also update/prioritize the inventory under this task.

ii. Anticipated Project Schedule: QEP selected through a competitive bidding process 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 Lead(s): Toa Alta & QEP

iv. Output(s): Travel-Municipal staff to regional and national brownfields conferences/meetings; prioritized inventory; project performance reports: Quarterly Reports, ACRES Entries, DBE reports, annual reports, etc.; calls, meetings, and correspondence between the Municipality, QEP, EPA, etc. to manage the grant's cooperative agreement.

Task/Activity 2: Env. Investigation

i. Project Implementation: Eligibility determinations will be completed under this task; 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 ASTM standard for Phase I ESAs (E1527-13) and the All Appropriate Inquiry (AAI) rule. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1; The QEP will prepare a Quality Assurance Project Plan (QAPP) which must be approved by the EPA. Once approved, the QEP, directed by the Municipality, will complete Phase II ESAs (after the completion and EPA approval of the Sampling & Analysis Plan/Health & Safety Plan (SAP/HASP) based on environmental conditions identified in the preceding Phase I ESAs.

ii. Anticipated Project Schedule: 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 Lead(s): Toa Alta & QEP

iv. Output(s): 5-6 Phase I ESAs each for haz. substance and petroleum impacted sites; Quality Assurance Project Plan (QAPP), estimated 3-5 Phase II ESAs each for hazardous substances and petroleum impacted sites.

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 (IV.E.1.c.i).

ii. Anticipated Project Schedule: throughout the grant period

iii. Task/activity Lead(s): QEP

iv. Output(s): 5-10 cleanup planning documents

Task/Activity 4: Community Outreach & Involvement:

i. Project Implementation: 4-6 public meetings will be held during the grant period to update the community on brownfield assessment progress and seek public input/involvement. Print and mail material for project/site information and marketing documents may 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. Social media outlets and other online media will be developed/maintained, and outreach efforts will inform the public on the progress of brownfield investigation/cleanup planning activities and provide marketing resources for future development.

ii. Anticipated Project Schedule: 1st outreach meeting planned for 2nd Quarter of grant period, remaining outreach events planned throughout the rest of the grant period.

iii. Task/activity Lead(s): Toa Alta & QEP

iv. Output(s): 4-6 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 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 an extremely high demand for assessments, it is likely that funds will be spent prior to the end date. If activities occur beyond the priority sites, they will occur after the inventory and prioritization is finalized (early 2nd quarter as indicated above). 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. Prior to applying for site eligibility under the grant, an access agreement will be prepared and executed for each site being considered.

***IV.E.3.b. Cost Estimates*:** The Municipality will allocate $242,300 to Phase I and II ESAs, equaling 81% of the total grant funding assigned directly 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.

Table 3 Budget	Budget Categories[1]	1. Program Mgmt, Training Support, Inv/Prioritization	2.Phase I/II ESAs	3. Clean-up Planning	4. Community Outreach & Involvement	Budget Category Total
Haz Subs	Travel	$1,500				$1,500
	Supplies				$100	$100
	Contractual[2]	$6,000	$121,150	$15,000	$6,250	$148,400
	Subtotal (Haz)	**$7,500**	**$121,150**	**$15,000**	**$6,350**	**$150,000**
Petro	Travel	$1,500				$1,500
	Supplies				$100	$100
	Contractual[2]	$6,000	$121,150	$15,000	$6,250	$148,400
	Subtotal (Pet)	**$7,550**	**$121,150**	**$15,000**	**$6,350**	**$150,000**
TOTAL BUDGET		**$15,000**	**$242,300**	**$30,000**	**$12,700**	**$300,000**

[1]Only budget categories with costs in Table. [2]In accordance with Federal, Territorial, and local procurement regulations.

The costs outlined in Table 3 above were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1. Grant tasks will be completed at the anticipated costs per unit with the following anticipated outputs/outcomes:

1. Program Management, Training Support, Inventory/Prioritization - $15,000 ($7,500 each for haz. substances and petroleum) – ***Travel*** (Attend National Brownfields Conf.): airfare x 2 @ $1,000, 2 rooms, 3 nights lodging @ $1,400, meals @ $450, ground transportation @ $150 = $3,000), ***Contractual***: total $12,000, includes approximately 104 hrs. $77/hr. = $8,000 for inventory, and approximately 52 hours $77/hr = $4,000 for program management. In addition, existing funds supporting Municipality staff ($8,000) will be offered in-kind for this task.

2. Env. Investigation - $242,300 ($121,150 each for haz. substances and petroleum) – ***Contractual***: 11 Phase I ESAs at an average cost of $3,500 = $38,500, & 6-10 Phase II ESAs at an estimated cost of $20,000-$40,000 (depending site complexity/environmental conditions) = $203,800. Though our budget will support 11 Phase I's and 6-10 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 Table 1.

3. Clean-up Planning: $30,000 ($15,000 each for haz. substances and petroleum) – ***Contractual***: 5-10 clean-up plans expected to cost $3,000-$6,000 each = $30,000.

4. Community Outreach & Involvement: $12,700 ($6,350 each for haz. substances and petroleum) – ***Supplies***: printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = $200, ***Contractual***: approximately 162 hours over three years at an estimated $77/hr = $12,500.

***IV.E.3.c. Measuring Environmental Results*:** Tracking, measuring, and evaluating progress will be achieved through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of any grant performance encountered/identified in Quarterly Reports, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones are not met/the project schedule outlined in IV.E.3.a is not being met, we will create a corrective action plan to identify the areas of deficiency and make the appropriate adjustments necessary to achieve the anticipated outputs/outcomes on schedule. Further, the Assessment Grant will have the following measurable results: 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 project, the Municipality will provide a final report to the EPA and the community summarizing project outputs and outcomes.

***IV.E.4. Programmatic Capability & Past Performance, a. Programmatic Capacity, i. Organizational Structure & ii. Description of Key Staff*:** Toa Alta's municipal staff in the Federal Programs Office (FPO) will manage this grant. Assistance will be sought from a qualified consultant to assist in grant management activities, but the majority of programmatic management will be conducted by the municipality. This office has previously managed many other economic development resources valued at well over $15M in the past 10 years, including those listed in IV.E.4.b. The FPO, supported by other municipality staff, have the technical, financial, and administrative ability in place to implement this grant project successfully. Ms. Aurea Cintron, Federal Programs Office Director 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. Ms. Cintron earned a Bachelor's

Degree in Computer Science, has been with Toa Alta for 35 years, managing federal grants in her role as Federal Programs Director. She has been integral to the success of many other Toa Alta redevelopment grant programs and has extensive experience managing grant activities for the Municipality. Ms. Cintron will be assisted by Jannet Rodriguez, Planning and Development Office Director, who has extensive experience in planning and redevelopment design. Ms. Rodriguez earned a MBA and has worked for Toa Alta for 5 years. Both Cintron and Rodriguez will use their previous brownfield redevelopment and economic development experience to seek reuse opportunities for those sites without secured redevelopment contracts. Finance Department Director Ms. Kristian Rivera 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 Toa Alta. Mrs. Miranda will be assisted by other Toa Alta Finance Department staff, as needed. Most staff assigned to this project have worked for the Municipality for at least 5 years. Our local government structure is stable, with little staff turnover, assuring a consistent reuse strategy and an efficient grant execution.

The depth of the Municipality's team will allow for a seamless transition to other experienced members. This level of involvement will allow for another member of the team to assume project management duties if it becomes necessary. Municipality staff has a history of working cooperatively with PR and federal environmental agency personnel and engaging qualified environmental consultants. This team will be supported by other municipality departments including finance, utilities, engineering, legal department, and office of the Mayor.

***IV.E.4.a.iii. Acquiring Additional Resources*:** Through a competitive bidding and procurement process, the Municipality will select an environmental consultant in accordance with federal procurement regulations (2 CFR 200.317 through 200.326) 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. As previously indicated, federal funds are our only resource to redevelop brownfields. We are pursuing funds from multiple federal agencies with the intent to piece together all the necessary funding to successfully redevelop brownfield properties. Some examples of federal funding we will seek include FEMA to develop low-income housing on the Industrial Sites, CDBG-DR funding to demolish the Industrial Sites and the former gas station, Dept. of Transportation to make road improvements along PR-861 & PR-165, and USEDA to incentivize job creation. As appropriate, we will utilize visioning sessions and other assistance/advice offered by the Center for Creative Land Recycling, the Region 2 TAB program, to maximize community input incorporation.

***IV.E.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*:** Toa Alta has never received an EPA Brownfields grant. However, we have received other federal and non-federal assistance agreements as indicated in Table 4.

Table 4 – Past Federally Funded Assistance Agreements

Funding Source	Project	$ Received	Outputs/Outcomes
Federal Transportation Agency 5310 Grant	Transportation Improvement/busses	$240K	Enhanced public transportation opportunities offered to low income, elderly, and disabled population through increased, subsidized bus transportation
HUD Section 8 Program	Low Income Housing Improvements	$1.2M	103 apartment units constructed; low income elderly residents provided with safe, affordable housing
FEMA	Disaster Relief	$8M	Emergency measures to repair/restore damaged infrastructure & municipal assets such as drinking and stormwater improvements, road repair and improvements, and enhancements to the electric power infrastructure

***IV.E.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 similar to those required under the EPA Brownfields Grant program, 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 grant programs simultaneously. All grant goals, outputs, and outcomes (indicated in Table 4) in the workplans of the previous grants were achieved, and all reports discussed were completed in a timely manner. The Municipality was fully compliant with the terms and conditions of these grant programs.

III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility

The Municipality of Toa Alta meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of the Territory 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. Toa Alta will utilize social media platforms, earned (free) media and other low-cost, no-cost or in-kind methods to engage the community, solicit public and stakeholder participation, and advertise public meetings. Regular public meetings have already been and will continue to be held to engage the public and encourage stakeholder and residents' participation in the EPA grant funded Brownfield activities. See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

III.C. Expenditure of Assessment Grant Funds

This criterion is not applicable as Toa Alta is not a current EPA Brownfields Assessment Grant recipient.

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 12/03/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: MUNICIPIO DE TOA ALTA

* b. Employer/Taxpayer Identification Number (EIN/TIN): [redacted]

* c. Organizational DUNS: 0911755210000

d. Address:

* Street1: PO BOX 693
Street2:
* City: TOA ALTA
County/Parish:
* State: PR: Puerto Rico
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 00954-0000

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.
* First Name: AUREA
Middle Name:
* Last Name: CINTRON NIEVES
Suffix:

Title: DIRECTOR OF FEDERAL PROGRAMS

Organizational Affiliation:

* Telephone Number: 7878701350
Fax Number:

* Email: ACINTRON@CIUDADTOAALTA.COM

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-19-05

* Title:

FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

FY2020 MUNICIPALITY OF TOA ALTA COMMUNITY WIDE BROWNFIELDS ASSESSMENT GRANT FOR HAZARDOUS SUBSTANCES AND PETROLUEM

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant 00-000 * b. Program/Project 00-000

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2020 * b. End Date: 09/30/2023

18. Estimated Funding ($):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: JOEL

Middle Name:

* Last Name: MARKLAND

Suffix:

* Title: CONSULTANT

* Telephone Number: 3175784233 Fax Number:

* Email: JMARKLAND@BCACONSULTANTS.COM

* Signature of Authorized Representative: JOEL MARKLAND * Date Signed: 12/03/2019