

Brownfields Assessment Grant Information Sheet

1. Applicant Identification

Center for the Reconstruction of the Habitat
PO Box 20074, San Juan, PR 00928-0074

2. **Website:** www.crhpr.org

3. Funding Requested

- A. Assessment Type: Community-wide Assessment Grant
- B. Federal Funds Requested: \$500,000.00

4. **Locations:** Vega Baja, Toa Baja, and Hormigueros, Puerto Rico

5. Target Area and Priority Site/Property Information

- A. **Target Areas:** Vega Baja, Toa Baja, and Hormigueros, Puerto Rico
- B. **Priority Sites:**
 - i. The Cabo Caribe Industrial Park, intersection of PR-6172 and Calle 1, Vega Baja, PR
 - ii. María Libertad Gómez School, 1 Paseo Azalea, Toa Baja, PR
 - iii. Ana Pagán de Rodríguez School, PR-309 km 67, Hormigueros, PR
- C. **Target Area Map** (see attached)

6. Contacts

- A. Project Director: Luis Gallardo - (787) 396-6606 - gallardo@crhpr.org - PO Box 20074, San Juan, PR 00928-0074
- B. Chief Executive: President Belinés Ramos - (939) 218-7259, belines.ramos@upr.edu - PO Box 20074, San Juan, PR 00928-0074

7. Population

- A. Vega Baja, Puerto Rico - 53,684
- B. Toa Baja, Puerto Rico- 72,783
- C. Hormigueros, Puerto Rico - 17,376

8. Other Factors-

Factor	Page #
Community population is 10,000 or less.	N/A
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.	N/A

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
The priority site(s) is in a federally designated flood plain.	1
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	N/A
The reuse strategy or project reuse of the priority site(s) considers climate adaptation and/or mitigation measures.	2-3
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.	N/A

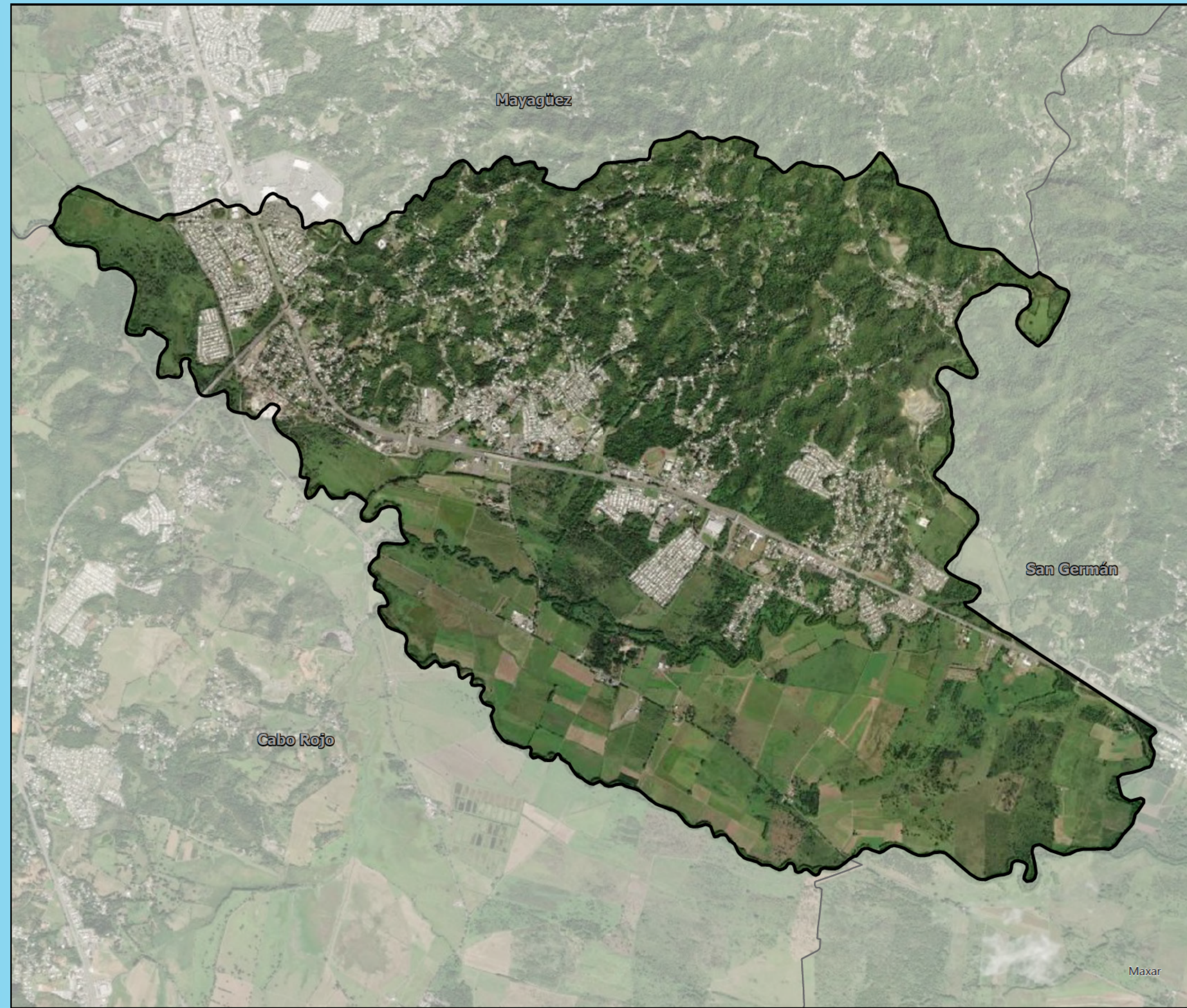
8. Letter from the State or Tribal Environmental Authority

See attached.

9. Releasing Copies of Applications

N/A

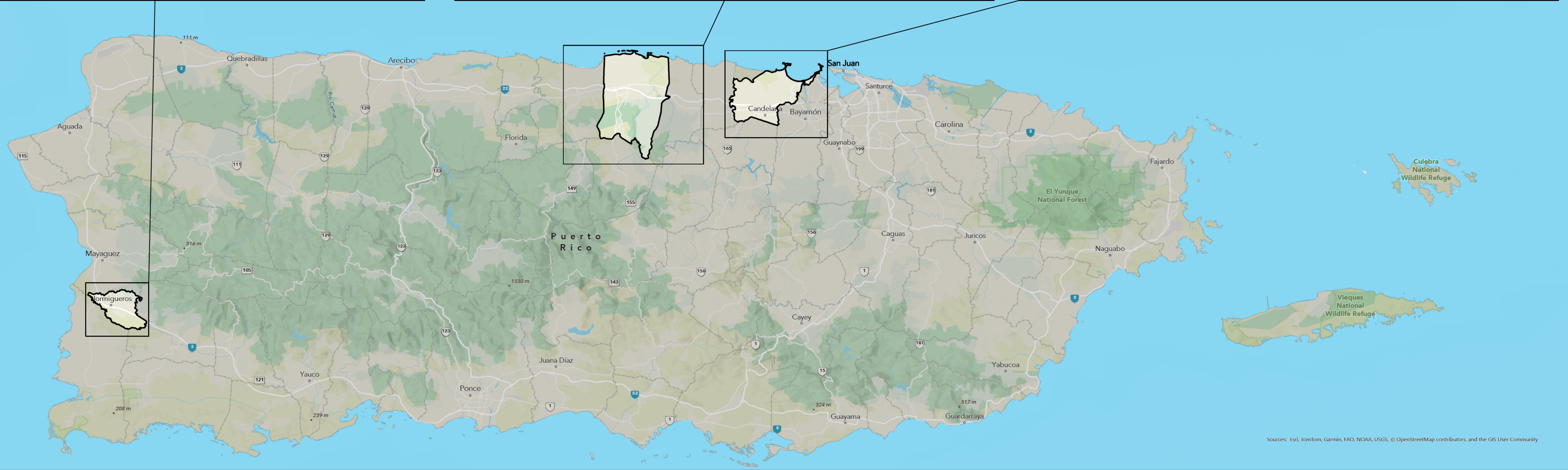
Hormigueros



Vega Baja



Toa Baja



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community



GOVERNMENT OF PUERTO RICO
DEPARTMENT OF NATURAL AND ENVIRONMENTAL RESOURCES

NOV - 8 2024

Mr. Luis Gallardo Rivera
Executive Director
Centro Para La Reconstrucción
del Habitat, Inc.
220 Calle Manuel Domenech Unit #644
San Juan, PR 00918

Dear Mr. Gallardo-Rivera:

CENTER FOR HABITAT RECONSTRUCTION, INC. ACKNOWLEDGMENT LETTER FOR THE INTENTION TO APPLY FOR FY-25 US EPA BROWNFIELD'S PROGRAM FOR A COMMUNITY-WIDE HAZARDOUS SUBSTANCES AND PETROLEUM ASSESSMENT GRANT AT THE MUNICIPALITIES OF VEGA BAJA, TOA BAJA AND HORMIGUEROS, 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 hazardous substances and petroleum Grant for the fiscal year 2025.

DNER acknowledges and supports the initiative taken the initiative taken by the Centro para la Reconstrucción del Hábitat, Inc. The identification, inventory development, assessment, cleanup and redevelopment of Brownfields sites will provide an opportunity to enhance the social, economic and environmental conditions in these municipalities. DNER encourages the Municipalities of Vega Baja, Toa Baja & Hormigueros 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 5914, 5915 or by email at BrownfieldsGrant@drna.pr.gov.

Cordially,

Roberto Méndez Martínez, Esq.
Acting Secretary

EOMS/OESS

Narrative/Ranking Criteria:

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area: The CRH will be carrying out community assessment in three separate target areas. Each of these municipalities have existing agreements with the CRH for the creation of community-focused blight-reduction programs, and represent a diversity of communities (coastal, urban, and rural): **Municipality of Vega Baja** – Its Cabo Caribe region was a key part of Puerto Rico’s sugar industry, later converted into an Industrial Park, acting as a bustling source of jobs. Nevertheless, the exit of manufacturing 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 and is 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 Hormigueros** – Known for its historic pilgrimage site, the Basilica Menor, Hormigueros is a small municipality in Puerto Rico’s western region. Its economy was similarly based on agriculture, and in recent decades, has seen shifts in land use as manufacturing declined. It too has its respective flood zones, though primarily from runoff, as opposed to coastal water. Population: 17,376.

Collaborations in previous years have produced surveys of 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 1,128 blighted properties, in Toa Baja 1,627 and in Hormigueros 507. Globally, 71% of these properties feature some kind of mold, mildew, chalking, efflorescence, and/or blistering of aged paint; 66% rubbish deposits, 64% accumulation of garbage, 22% abandoned vehicles, 20% with the presence of some sort of oil or chemical waste, and 14% with mosquito hatcheries. Though the target areas are not continuous, they represent part of a larger archipelago-wide and CRH-led strategy to combat abandonment, with all three having a Community Land Bank (CLB).

1.a.ii. Description of the Priority Brownfield Site(s): The referenced inventory is composed primarily of blighted single family homes, as well as a smaller number of commercial, institutional, and industrial spaces. This proposal emphasizes residential properties, often overlooked by many municipalities’ Assessment proposal, despite also qualifying as brownfields. Nevertheless, several sites have been identified as priority sites in order to 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. **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, 1 Paseo Azalea, Toa Baja. **Historic Use:** Former school, including kitchen and cafeteria. **Suspected Contaminants:** This school has already received a TBA Phase I study, identifying the need for additional studies. This could reveal PAHs, grease and oil residues, asbestos, lead-based paint. **Site #3:** Ana Pagán de Rodríguez School, PR-309 km 67, Hormigueros. **Historic Use:** Former uniform factory. **Suspected Contaminants:** Heavy metals, solvents, PCBs, e-waste, and acids and bases.

The Vega Baja site was chosen due to its complex environmental issues from industrial use, potential hazards to nearby sensitive populations, and its redevelopment potential.

The sites in Toa Baja and Hormigueros, however, were prioritized as abandoned schools, which are a pervasive issue in Puerto Rico, presenting unique environmental risks. The CRH has extensively studied this problem, even publishing a study to address the health and safety concerns abandoned schools pose to surrounding communities, aligning with the NOFO's objectives of environmental health, safety, and revitalization.¹ None of the above-mentioned potential sites of interests are on the National Priorities List, nor does there exist unilateral administrative orders, court orders, administrative orders on consent, judicial consent decrees, or ongoing or anticipated enforcement activities; they are exempt CERCLA liability criteria; and neither are subject to the jurisdiction, custody, or control of the U.S. government.

1.a.iii. Identifying Additional Sites: The CRH will leverage the extensive groundwork, having mapped 3,262 blighted properties across the target areas. A robust pipeline for future projects is in place, ensuring that there is no shortage of future 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 and environmental improvement. Priority will be given to sites located in disadvantaged areas, aligning with the mission to address inequities in areas 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. As a territory, we are exempt from the second part of this question.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: The proposed redevelopment strategies are carefully aligned with local land use and revitalization plans. In particular, with Puerto Rico's post-hurricane reconstruction efforts, there is an urgent need to maximize the potential of the island's extensive inventory of abandoned properties. This proposal aligns directly with the Vega Baja Municipal Recovery Plan (MRP),² which emphasizes the conversion of abandoned properties and creation of a CLB (p. 49), as well as highlights the importance of leveraging citizen participation in Cabo Caribe (p. 43). The Toa Baja MRP,³ identifies a need to use blighted properties for affordable housing (p. 55) and employ the CLB as a sustainable development tool (p. 63), while its Territorial Plan⁴ stresses the need to increase educational offerings (p. 123) as well as increase technological and scientific capacities (p. 128), which could be supported through the revitalization of the proposed priority site. Lastly, the Hormigueros MRP⁵ aligns with this proposal, prioritizing the rehabilitation of blighted structures (p. 17) as well as leveraging its abandoned schools to increase public services (p. 37). Each of these plans cite the CRH as a potential collaborator (p. 73, 85, and 44, respectively).

Furthermore, each site reuse strategy can be tailored to meet the specific context of these areas. With the bulk of the properties composed of single family homes, this project has ample potential to serve Puerto Rico's housing crisis, while also eliminating environmental risks. In regards to the proposed target priority sites: the Cabo Caribe industrial complex in Vega Baja, for example, is suited for repurposing for light industrial uses, leveraging its proximity to roadways and access to existing infrastructure. The municipal government has expressed interest in transforming this site from a heavy industrial area to one that can accommodate light industries, attracting a broader range of investors and creating local jobs. This approach capitalizes on

¹ https://belonging.berkeley.edu/sites/default/files/puerto_ricos_public_school_closures.pdf

² https://cdn.recuperacion.pr.gov/w3cacheitdg/wp-content/uploads/2024/10/2024-04-16_PLN_MRP_Plan-Vega-Baja.pdf

³ <https://cdn.recuperacion.pr.gov/w3cacheitdg/wp-content/uploads/2024/05/2024.05.10-Plan-final-Municipio-de-Toa-Baja.pdf>

⁴ <https://jp.pr.gov/wp-content/uploads/2021/12/Toa-Baja-PT-Memorial-Narrativo.pdf>

⁵ <https://recuperacion.pr.gov/wp-content/uploads/2023/03/MRP-Hormigueros-borrador-final.pdf>

existing public infrastructure while driving economic development within the community. Similarly, the former school site in Toa Baja could serve as a technical school, supporting the local plan's objectives to increase educational opportunities. This site can contribute to workforce development in technical fields, addressing both educational and economic needs. Finally, in Hormigueros, the abandoned school has been identified for conversion into a community resiliency center, in addition to other public services, such as a community library.

1.b.ii. Outcomes and Benefits of Reuse Strategy: Research demonstrates the negative and disproportionate impacts of environmental hazards on marginalized populations, including people with disabilities, low-income communities, and those of color. Our approach significantly reduces these adverse effects, while providing tangible economic benefits. For example, the redevelopment of the Cabo Caribe Industrial Park in Vega Baja, for example, could stimulate economic growth by attracting light industries, creating approximately 100 new jobs through 7 new small businesses, directly benefiting residents and reducing unemployment. The Toa Baja school rehab project could create a technical training center to serve up to 125 students each year and would help meet the municipality's goal to expand educational opportunities and thus, reduce youth unemployment. Finally, the Hormigueros school rehab project will create a community resiliency center and library, providing critical resources for disaster preparedness and education. This revitalization enhances resiliency, and as a refuge serving up to 75 families during natural disasters. This project aligns with Justice40 by ensuring that 40% of the resulting benefits reach disadvantaged communities, and will reduce pollutant exposure, improve environmental quality, and enhance public health. These outcomes will support long-term resilience, environmental justice, and economic opportunity for predominantly Hispanic, low-income populations facing high levels of social and environmental stressors.

1.c. Strategy for Leveraging Resources.

1.c.i. Resources Needed for Site Reuse: The proposed projects represent the first step towards the repurpose of abandoned brownfields, and thus, the CRH is fully aware of the need to seek additional resources. By producing site assessments, environmental studies, market viability studies, and other planning activities, we 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 blight registries among municipalities, this project provides a rare opportunity to demonstrate the massive potential that brownfield redevelopment may have on Puerto Rico's recovery efforts. In addition, it will demonstrate the benefits of municipalities tying in their enforcement activities with brownfields remediation. The CRH does not receive current brownfields funding, though the CRH is a recipient of an EPA Environmental Justice Collaborative Problem Solving. Additionally, as a 501(c)(3), it qualifies for additional brownfields funding and loans, Community Development Block Grants Disaster Recovery (CDBG-DR), HUD Main Street, the Community Reinvestment Act, and Coronavirus Fiscal Recovery Funds (SLFRF), offers various examples of ideal public-sector funding opportunities, all of which the CRH has already utilized in other target areas. In addition, the CRH has recently created a revolving loan fund for CLBs, raising \$300,000 from philanthropic sources. This will definitely provide valuable experience and knowledge for the leveraging of future resources.

1.c.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 or sub-urbanized areas with ample connection to main roads and routes.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need:

2.a.i. The Community's Need for Funding: Puerto Rico has been experiencing a severe crisis of abandonment, with vacancy rates in Vega Baja (22%), Toa Baja (20%), and Hormigueros (23%) nearly twice the U.S. average of 12.2%, indicating a critical need for intervention. Traditionally, municipalities have 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 the case of our target municipalities, all three have already carried out extensive surveys of eligible properties, have created CLBs, and established acquisition and reuse pipelines, but lack sources for environmental testing, studies, and technical know-how to move forward. This grant assists address this need.

2.a.ii. Threats to Sensitive Populations.

(1) Health or Welfare of Sensitive Populations: The CRH's proposed activities will play a critical role in identifying and mitigating environmental hazards that disproportionately impact sensitive populations in the target areas. According to EJSCREEN, these communities fall into high percentile ranks on the Demographic Index, with Vega Baja at the 96th percentile, Toa Baja at the 83rd, and Hormigueros at the 97th—well above the U.S. average of 35. Poverty is a major concern in these areas, with poverty rates at 43.2% in Vega Baja, 47.8% in Toa Baja, and 41.1% in Hormigueros. EJ Indexes for Vega Baja, Toa Baja, and Hormigueros are particularly alarming, with lead paint exposure (75th, 69th, and 85th percentile, respectively), Superfund proximity (99th, 98th, and 96th percentile), RMP facility proximity (42nd, 97th, 79th percentile), and hazardous waste indexes (88th, 92nd, and 92nd percentile), indicating a very high potential exposure to environmental risks compared to most other areas in the U.S. With multiple indicators in high percentiles, target area residents experience a greater cumulative environmental burden and associated health risks than much of the U.S. The presence of nuisance properties contributes to poor air quality, pest infestations, and exposure to toxins. Children and elderly residents, the latter who represent a significant portion of the population, are particularly vulnerable to these hazards, which can lead to long-term health complications and diminished quality of life. Finally, all of Vega Baja's census tracts, as well as 12 of Toa Baja's 14 tracts, and the entirety of Hormigueros are considered disadvantaged per CEJST.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: While the cancer incidence rates in these municipalities are below the U.S. average of, Puerto Rico remains vulnerable due to fewer resources for environmental cleanup and healthcare access, making intervention critical to prevent further health disparities. Asthma rates in these areas are notably high, with Vega Baja, Toa Baja, and Hormigueros experiencing 54%, 54%, and 56% higher asthma prevalence than the U.S. average, respectively, according to the American Lung Association. Exposure to pollutants such as particulate matter, diesel exhaust, and hazardous substances exacerbates these conditions, particularly among sensitive populations. Regarding birth defects, there is no specific data available on a per-municipality basis from the Centers for Disease Control and Prevention, but the island's general health vulnerabilities suggest that environmental hazards could be contributing factors.

(3) Environmental Justice:

(a) Identification of Environmental Justice Issues: The target areas are disadvantaged communities per CEJST, with high levels of poverty and significant environmental burdens, including abandoned sites, illegal dumping, and blight. These conditions disproportionately expose residents to health risks like respiratory diseases and developmental issues, as indicated by high national percentiles in EJSCREEN. This grant will enable CRH to address these environmental hazards directly, transforming contaminated sites into safe, productive spaces. As a territory, we are exempt from the second part of this question.

(b) Advancing Environmental Justice: By eliminating these risks, the project will promote environmental justice, enhancing health, safety, and resilience for underserved, predominantly Hispanic communities that lack the resources to address these issues independently. The reuse strategy prioritizes community-centered redevelopment, transforming contaminated sites into assets that support local needs, such as community centers, green spaces, and affordable housing, which directly benefit current residents and improve their quality of life. Revitalizing these properties through CLB will be central to avoid displacement, allowing for direct community participation in the reuse planning process. By involving residents and local stakeholders, CLBs ensure that redevelopment aligns with the community’s needs and values.

2.b. Community Engagement

2.b.i. Project Involvement: The CRH employs a participatory approach as the central driving force for nearly every task within the project, partnering with key local stakeholders to ensure the community's voice is integral to all project phases. This proposal incorporates each of the municipalities’ CLBs; the boards of which are composed of community leaders and residents directly affected by blighted sites and are committed to advancing environmental justice. In the past three years, CRH has conducted 18 community meetings in these municipalities, engaging residents on blight identification and remediation. Moving forward, CRH will continue to engage these groups through a series of open meetings, where residents will be briefed on project progress, oriented on brownfield identification techniques, and actively consulted on their concerns and aspirations for site reuse. Community members, alongside CRH and municipal staff, will be incorporated into follow-up surveys, ensuring that local knowledge contributes to a comprehensive inventory of contaminated properties. After community-driven brownfield listings are complete, the parties will hone in on those properties with potential reuse that best aligns with local priorities, public health considerations, and environmental justice goals. This collaborative approach guarantees that the community is not only informed but empowered to shape and benefit from the revitalization of their neighborhoods, reducing the risk of displacement and ensuring that redevelopment serves the residents’ interests.

2.b.ii. Project Roles:

Name	Entity’s Mission	Point of contact	Involvement and Task #
Center for Habitat Reconstruction	Promote sustainable development in Puerto Rico by revitalizing abandoned properties and empowering communities for	Luis Gallardo gallardo@crhpr.org (787) 396-6606	Community Engagement and Outreach (1), Site Assessment and Environmental Remediation (2), Partnership Building (1, 2, 3), Reuse Planning and Visioning (3), Technical Assistance and Capacity

	resilient, equitable growth.		Building (1, 3), Monitoring and Evaluation (1, 2, 3).
Municipality of Vega Baja	Per the Municipal Code of Puerto Rico, municipalities are the most local branch of governing, aiming to foster public welfare and development through autonomous governance, efficient services, and local economic growth.	Veronica Bruno, vbruno@vegabaja.gov.pr (787) 855-2500	Community Outreach and Engagement (1), Site Identification and Assessment (2), Code Enforcement and Compliance (2), Decision-Making in Site Selection (1, 3), Resource Allocation and Support (2), Future Reuse Planning and Zoning Adjustments (3).
Municipality of Toa Baja		Anilda Fernández afernandez@toabaja.com (787) 261-0202	
Municipality of Hormigueros		Abdiel Matos amatos@hormiguerospr.com (939) 299-8056	
Community Land Bank of Vega Baja	A CLB in Puerto Rico is a municipal-created non-profit dedicated to restoring abandoned properties for community benefit, focusing on affordable housing, green spaces, and combating urban decay.	Jhomary González jgonzalez@cimientocomunitario.org (787) 312-3513	Community Participation in Site Selection and Reuse Planning (1, 3), Ownership and Stewardship of Reclaimed Sites (3), Development of Community-Centered Reuse Strategies (3), Financing and Resource Mobilization (3), Monitoring and Enforcement of Land Use Covenants (3), Education and Capacity Building (1, 3).
Community Land Bank of Toa Baja		Eric Marrero [REDACTED]	
Community Land Bank of Hormigueros		Carmen N Greene [REDACTED]	

2.b.iii. Incorporating Community Input: The CRH will consistently communicate project progress and engage local communities, underserved groups, and directly affected residents. Project updates, including milestones like site selection and assessment findings, will be shared through community meetings, flyers during the beginning and half-way mark of the project, and social media, ensuring broad accessibility. Community input will be actively solicited through annual town hall-style meetings, where citizens can receive updates, ask questions, submit proposals, and engage in discussions regarding identified brownfields and potential reuse. Feedback gathered will be reviewed, and CRH will transparently communicate how community suggestions have informed project decisions. Regular engagement through semester meetings with the CLB and its leadership, with invitations to other local organizations and neighborhood associations to public meetings will further ensure that community voices remain integral to the project’s development.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs:

Task/Activity #1: Community Involvement
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 efforts as mentioned in section 2.b.iii. The CRH will

then review each code enforcement database to identify those cases that could be considered brownfields, and particularly, areas surrounding priority sites. The CRH will also gauge each properties' legal and ownership status to test viability for future acquisition by 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 feedback loops. Communities will utilize available data for public comment and hone in on those properties with the potential to address each target area's priorities, market needs, infrastructure, contamination, public health, and local ordinances.

ii. Anticipated Project Schedule: Continuous from month 6 to month 48.

iii. Task/Activity Lead(s): 3 Regional Coordinators, one per target area.

Outputs: 9 community meetings and 3 community databases of potential brownfields.

Task/Activity #2: Assessment

i. Project Implementation: The CRH will further hone in on those sites with the most potential and carry out Phase I site assessments for priority sites lead-based and asbestos testing for its largely residential inventory. 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. 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 from month 9 to month 36.

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

iv. Outputs: Up to 9 Phase I site assessments, up to 3 Phase four Phase II site assessments, as well as lead-based paint and asbestos assessments for 32 single family homes.

Task/Activity #3: Reuse Planning

i. Project Implementation: Pre-development analysis and reuse assessments for sites with high potential, including priority sites identified through environmental analysis. Based on this analysis, specific sites will be selected for further pre-development analysis, which could include the target sites. This activity addresses a common gap identified in many CLBs, which often lack crucial information on a property's potential value, site layout, or rehabilitation costs. By providing detailed assessments, the CRH will equip CLBs with essential data to support informed reuse decisions, facilitating the properties' future acquisition.

ii. Anticipated Project Schedule: Continuous from month 27 to month 48.

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

iv. Outputs: Appraisals, plot plans, and cost estimates for up to 32 properties.

Note: All project implementation will be carried out with EPA funding.

3.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:

- *Coordinators:* Will coordinate outreach, engagement, and mobilization efforts with Partners and oversee contracting efforts for site-specific analysis. At \$22 an hour for 1,587 hours, compensation rate is based on previous CRH experience.
- *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, for 1,248 hours is based on previous CRH experience.

- *Attorneys:* Will oversee title studies and legal research within the framework of municipalities' code enforcement and nuisance abatement programs. At \$35 an hour compensation rate, for 1,248 hours is based on previous CRH experience.
- *Fringe Benefits:* Based on 18% of personnel costs, based on previous CRH experience.
- *Travel expenses:* Based on \$600 per airfare, \$200 hotel per night, and per diem of \$75 per day, for one regional educational convening per year for three persons, based on previous experience.
- *Mileage and toll:* \$0.67 per mile is based on the IRS-based rate, for 1,770.15 miles.
- *Office supplies:* \$1,000 per year for three 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, based on market value, for 9 properties.
- *Phase II studies:* Based on area-based estimates at \$20,000 per large-scale study, based on market value, for 3 properties.
- *Asbestos and Lead-Based paint studies:* Based on CRH's experience at \$1,800 per study for 32 properties, based on market value.
- *Site Reuse Assessment:* Based \$1,500 for municipal-purpose appraisals, \$1,500 per municipal-purpose plot plans, and \$400 for cost estimates, for 32 properties, based on experience.

Budget Categories		Project Tasks			Total
		Task 1: Community Outreach	Task 2: Assessments	Task 3: Reuse Planning	
Direct Costs	Personnel	\$31,647	\$31,647	\$31,647	\$94,941
	Fringe Benefits	\$5,696	\$5,696	\$5,696	\$17,089
	Travel	\$5,496	\$5,495	\$5,495	\$16,485
	Equipment	\$0.00	\$0.00	\$0.00	\$0.00
	Supplies	\$2,760	\$2,760	\$2,760	\$8,280
	Contractual	\$0.00	\$208,950	\$108,800	\$317,750
	Other	\$0.00	\$0.00	\$0.00	\$0.00
Total Direct Costs		\$45,599	\$254,548	\$154,398	\$454,545
Indirect Costs		\$4,560	\$25,455	\$15,440	\$45,455
Total Budget		\$50,158	\$280,003	\$169,838	\$500,000

3.c. Plan to Measure and Evaluate Progress and 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 (35 Points)

4.a. Programmatic Capability.

4.a.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 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 23 municipalities to facilitate community planning models aimed towards creating participatory code enforcement programs and land banking.

4.a.ii. Organizational Structure: The CRH is a 501(c)(3) 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.

4.a.iii. Description of Key Staff: **Luis Gallardo**, CRH Executive Director, manages organizational affairs with expertise in municipal and public nuisance law. He holds a Bachelor's in Sociology, a Master's in Public Administration (City Management), and a Juris Doctor, and has directed departments in both Puerto Rican and U.S. local governments. He will serve as Program Manager for this grant. **Coralys Rosado**, Vega Baja Regional Coordinator, leads blighted property identification and code enforcement efforts in the region, drawing on experience in case planning and community work. She holds a law degree and has served with the U.S. Census and as a judicial law clerk. **Cesar Atresino**, Hormigueros Regional Coordinator, has a Bachelor's in Social Sciences and a Master's in Sociology from the University of Puerto

Rico. He has experience in community organizations and socioeconomic research. **Michelle Rivera**, Toa Baja Regional Coordinator, holds a Bachelor’s in Social Work and a Master’s in Public Health (Gerontology). She has worked in public health projects, program planning, and community development, with interests in social determinants of health and the arts.

4.a.iv. Acquiring Additional Resources: Key staff are familiar with non-profit procurement procedures and have sufficient capacity 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.

4.b. Past Performance and Accomplishments

4.b.ii. Has Not Received an Brownfields Grant but has Received Other Assistance

Agreements: Examples of other agreements include:

Grant	Purpose and Accomplishments	Compliance
Environmental Justice Collaborative Problem-Solving (EPA)	Provide legal and planning services to three municipalities. Accomplishments include thorough inventories and community plans.	\$200,000. The grant is still active though it is currently scheduled to wrap up in Q3 2025. At the present, the CRH has spent 40% of this allocation.
Rural Placemaking Innovation Challenge (USDA)	Planning support to the La Playa community of Barceloneta in identifying and promoting new uses for abandoned properties. Accomplishments include inventorying 117 properties and a Reuse Plan.	\$200,000. The grant has been successfully closed and is in good standing.
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 last semester and has expended 74% of funding.
Vacant Property Assessment (CDBG-DR)	Create a Puerto Rico-wide inventory of 50,000 abandoned properties to support municipal code enforcement and affordable housing programs.	Projected to finish in Q2 2025, though the CRH is currently in the process of extending the grant for two more years to add 59,000 additional properties.

Attachment: Threshold Criteria Requirements

Threshold Criteria Section:

1. Applicant Eligibility:

- a. Type:** Nonprofit organization described in section 501(c)(3) of the Internal Revenue Code. Please Review the Exhibit A: Documentation of 501(c)(3).
- b. 502(c)(4) Tax Status:** N/A

- 2. Description of community involvement:** The CRH employs a participatory approach as the central driving force for nearly every task within the project, partnering with key local stakeholders to ensure the community's voice is integral to all project phases. This proposal incorporates each of the municipalities' CLBs; the boards of which are composed of community leaders and residents directly affected by blighted sites and are committed to advancing environmental justice. In the past three years, CRH has conducted 18 community meetings in these municipalities, engaging residents on blight identification and remediation. Moving forward, CRH will continue to engage these groups through a series of open meetings, where residents will be briefed on project progress, oriented on brownfield identification techniques, and actively consulted on their concerns and aspirations for site reuse. Community members, alongside CRH and municipal staff, will be incorporated into follow-up surveys, ensuring that local knowledge contributes to a comprehensive inventory of contaminated properties. After community-driven brownfield listings are complete, the parties will hone in on those properties with potential reuse that best aligns with local priorities, public health considerations, and environmental justice goals. This collaborative approach guarantees that the community is not only informed but empowered to shape and benefit from the revitalization of their neighborhoods, reducing the risk of displacement and ensuring that redevelopment serves the residents' interests.

The CRH will consistently communicate project progress and engage local communities, underserved groups, and directly affected residents. Project updates, including milestones like site selection and assessment findings, will be shared through community meetings, flyers during the beginning and half-way mark of the project, and social media, ensuring broad accessibility. Community input will be actively solicited through annual town hall-style meetings, where citizens can receive updates, ask questions, submit proposals, and engage in discussions regarding identified brownfields and potential reuse. Feedback gathered will be reviewed, and CRH will transparently communicate how community suggestions have informed project decisions. Regular engagement through semester meetings with the CLB and its leadership, with invitations to other local organizations and neighborhood associations to public meetings will further ensure that community voices remain integral to the project's development.

- 3. Available Balance on Assessment Grants:** The CRH has not received an EPA Brownfields Grant.

- 4. Contractors:** The CRH has not selected a contractor or subrecipient of EPA funds made available under this RFA.