

IV.D. Narrative Information Sheet

1. Applicant Identification:

- a. **Municipality of Toa Alta, Puerto Rico**
P.O. Box 693 Toa Alta, P.R. 00954
(787) 870-2100

2. Website URL:

- a. <https://www.facebook.com/CiudadAutonomaDeToaAlta/>

3. Funding Requested:

- a. Assessment Grant Type: Community-wide Assessment Grant
- b. Federal Funds Requested: \$500,000

4. Location:

- a. Municipality of Toa Alta
- b. Toa Alta
- c. Puerto Rico

5. Target Area and Priority Site/Property Information

- a. Target Area: Former Industrial Zone (FIZ)
- b. The Former Industrial Zone is bordered in the north by the municipalities of Toa Baja and Dorado, and in the east, south, and west by rural and agricultural valleys and mountains of the municipality, the FIZ covers an area of 3.2 mi² and is located within Census Tracts (CT) 5103 & 5104. The FIZ includes the urban center, and a large portion of the industrial/commercial sector of Toa Alta, with high visibility due to its location near a major intersection between PR-2 and PR-22. Unfortunately, the FIZ contains numerous aging, shuttered, and underutilized properties in our main commercial/industrial district.
- c. Priority Sites Addresses:
 - i. Former Coffin Factory – PR-165, Toa Alta, PR 00954
 - ii. Industrial Bldg. T-0149-0-52 – PR-165, Toa Alta, PR 00954
 - iii. Former PharmaSeal – PR-165, Toa Alta, PR 00954
 - iv. Former Carton Factory – PR-165, Toa Alta, PR 00954
 - v. Trucking Depot – PR-165, Toa Alta, PR 00954



6. Contacts:

- a. Project Director:
 Miguel A. Fonseca Fonseca, Director of Planning and Federal Programs
 Municipality of Toa Alta
 P.O. Box 693 Toa Alta, P.R. 00954
 (787) 870-2100
mfonseca@ciudadtoaalta.com
- b. Chief Executive/Highest Ranking Elected Official
 Clemente Agosto Lugardo
 P.O. Box 693 Toa Alta, P.R. 00954
 (787) 870-2100
clemente.agosto@ciudadtoaalta.com

7. Population: Municipality of Toa Alta – 66,852 (US 2020 Decennial Census)

8. Other Factors Checklist

Other Factors	Page#
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Page 2
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.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	Page 3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2014 or later) or is closing.	

9. Letter from the State or Tribal Environmental Authority.

- a. Letter from the Puerto Rico Department of Environmental and Natural Resources is attached.

10. The Municipality of Toa Alta is not making any claims for confidential, privileged, or sensitive information, in this application/document.



GOVERNMENT OF PUERTO RICO
DEPARTMENT OF NATURAL AND ENVIRONMENTAL RESOURCES

NOV - 8 2024

Mr. Miguel A. Fonseca-Fonseca, Acting Director
Federal Programs
Municipality of Toa Alta
PO BOX 82
Toa Alta, PR 00954

Dear Mr. Fonseca-Fonseca:

MUNICIPALITY OF TOA ALTA ACKNOWLEDGMENT LETTER FOR THE INTENTION TO APPLY FOR FY-25 US EPA BROWNFIELD'S PROGRAM FOR A COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANT AT THE MUNICIPALITY OF TOA ALTA, PUERTO RICO

The Department of Natural and Environmental Resources (DNER) Superfund Program has received a letter from the municipality of Toa Alta informing us of its intention to apply for a Community Wide Brownfields Assessment Grant for the fiscal year 2025.

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 of Toa Alta 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

1. Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i. Overview of Brownfield Challenges and Description of Target Area:

Founded in 1751, the Municipality of Toa Alta (Toa Alta) is 18 miles southwest of the San Juan Metropolitan Area in a predominantly rural/suburban region and is known for its scenic landscapes and cultural heritage. With a population of 66,699 (2022 ACS 5-Year Est.) and an area of ± 27.4 mi², Toa Alta has had a long economic history centered on agriculture, particularly sugar, horticultural products, and small-scale livestock farming, contributing to local and regional markets. Commercial and industrial development also plays a role in our more populated urban area. But a great portion of our residents take part in a commuter economy, working and spending in San Juan. As a result, Toa Alta's economy misses out on tax revenue from local commercial activities and income taxes from a significant portion of our working population. Our target area residents are grappling with economic challenges, primarily due to issues with infrastructure, limited funding for public amenities, loss of jobs, and the persistent impacts of natural disasters. Hurricanes (Maria-2017 & Fiona-2022) severely impacted Toa Alta, intensifying extreme socioeconomic and financial pressures. Damaged properties released chemicals like lead paint, petroleum, and other environmental hazards. This included over 1,500 homes and 100 commercial properties resulting in a 35% reduction in commercial sales revenue and a \$44.3M loss in FEMA-verified housing. The unstable economy coupled with climate-change induced natural disasters contributed to the demise of our commercial and residential vitality. Our current challenges are attracting and retaining commerce, in part, due to the many brownfields (i.e. former industrial sites) in the municipality and the need to incentive acquisition and redevelopment of these properties.

Target Area: Former Industrial Zone (FIZ) – bordered in the north by the municipalities of Toa Baja and Dorado, and in the east, south, and west by rural and agricultural valleys and mountains of the municipality, the FIZ covers an area of 3.2 mi² and is located within Census Tracts (CT) 5103 & 5104. The FIZ includes the urban center, and a large portion of the industrial/commercial sector of Toa Alta, with high visibility due to its location near a major intersection between PR-2 and PR-22. Unfortunately, the FIZ contains numerous aging, shuttered, and underutilized properties in our main commercial/industrial district. Past economic struggles brought brownfield challenges such as abandoned buildings, legacy pollution (Table 1), blight, increased crime, and strain on public resources. Brownfields add to financial burdens (reduced income, increase poverty, lower tax revenue and wages, etc. – 2.a.i) and health disparities (high cancer and infant mortality rates – 2.a.ii(2)) on FIZ residents. The FIZ population has declined by 5.7% since 2017 (from 8,387 to 6,683), due to job losses in the municipality, lack of basic and emergency services in more remote sectors, and from declining quality of life. Residents living among brownfields in the FIZ experience low income (Median Household Income (MHI) is just over 25% of that in the US) and high poverty (almost 4x higher than in the US (2022 ACS)) (see 2.a.ii).

Within the FIZ and adjoining PR-165, a primary gateway to our urban center, there are seven large abandoned industrial sites, which provided 240 high-paying jobs during their operations. These brownfield sites have been abandoned for over 2 decades due to concerns of environmental impacts mounting to a loss of over \$60M in tax revenue. Since the economic downturn, the federal government made significant investments in disaster response/recovery to facilitate redevelopment and resilience in PR, but these funds require that assessment and cleanup, if needed, prior to reuse. With so much redevelopment potential, we are making a focused effort to address priority brownfields (1.a.ii) and leverage funding for this hardest hit part of our community. We are already working hard to repurpose and reshape the FIZ economy. For example, with local and federal government assistance, we have made a \$50.4M investment in public infrastructure and municipal office development, and road and bridge repairs. Other municipal projects with allocated funds are still pending, as our limited budget for matching federal assistance requires careful management. Some federally funded reconstruction and risk mitigation projects require environmental assessments, creating a unique opportunity for synergy using EPA grant funds. Strategic investment of EPA assessment funds along with the resulting leveraging will significantly revitalize the FIZ, making our downtown more attractive to new businesses, developers, professionals, visitors, and residents. Once priority sites are redeveloped, our economy will no longer be influenced by the negative impacts of brownfields.

1.a.ii. Description of the Priority Brownfield Site(s): While our inventory lists 35 brownfield sites in

FIZ (±85 acres), Table 1 priority sites offer the best opportunity for successful reuse.

Table 1 – Priority Brownfield Sites and Impacts

Priority Site, Size, Proximity to Target Area Residents	Historic Use/Current Use & Condition/ Planned Reuse	Suspected Contaminants*
Former Coffin Factory – PR-165, 1.3 acres in industrial park; adjoins low-income, minority residential; <250meters from flood plain	Former Industrial factory / abandoned, deteriorated / commercial/recreational	PCBs, VOCs, PAHs, metals, petroleum, asbestos, PFAS
Industrial Bldg. T-0149-0-52 – PR-165, 1.4 acres in industrial park; adjoined by low-income, minority neighborhood, adjoins flood plain (La Plata River)	Former Industrial factory / abandoned, deteriorated / Convention center/commercial	PCBs, VOCs, PAHs, metals, petroleum, asbestos, PFAS
Former PharmaSeal – PR-165, 75.3 acres in industrial park; within low-income, minority neighborhood, adjoins flood plain (La Plata River)	Former Industrial factory / abandoned, deteriorated / retail complex	PCBs, VOCs, PAHs, metals, petroleum, asbestos, PFAS
Former Carton Factory – PR-165, 2.0 acres in industrial park; adjoins low-income, minority residential, within flood plain (La Plata River)	Former Industrial factory / structureless, in disuse / market square/office spaces	PCBs, VOCs, PAHs, metals, petroleum, asbestos, PFAS
Trucking Depot – PR-165, 2.2 acres in industrial park in low-income minority neighborhood, <200meters from flood plain	Former trucking depot / underutilized lot, deteriorated / housing (~112 units)	metals, petroleum, VOCs, PAHs, asbestos
*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 damage to skin, liver, kidneys, heart, spleen; nervous, respiratory, hormonal, blood, & immune systems; may also cause neurological damage, birth defects and cancer (www.atsdr.cdc.gov).		

These highest priorities sites will meet the FIZ’s immediate needs, align with our revitalization plans, and redevelopment is imminent, with funding already secured: \$2.6 million allocated for acquisition and \$1.7 million pledged by the Municipality for demolition. Additionally, interested investors have prepared conceptual designs, cost estimates, and anticipated outcomes for the proposed redevelopment plans, and preliminary negotiations are currently underway. Redevelopment of commercial, residential, and recreational on priority brownfield properties in the FIZ and throughout Toa Alta will serve as examples of success, triggering further investment. For example, the four industrial sites potentially impact the adjoining neighborhood with PFAS, PCBs, solvents, and other industrial chemicals and have become a long-standing blight that has long affected the area. After addressing environmental and health threats, the municipality plans to partner with private investors to transform these and adjoining properties into commercial and residential areas with a convention center, market square, and office spaces bringing needed economic development, a mixed-use environment, and high-paying jobs (per our Revitalization Plans (1.b.i.)).

1.a.iii. Identifying Additional Sites: If grant funds remain after addressing target area/priority sites, we may choose to invest in properties outside the FIZ (within census tracts containing underserved residents or a disadvantaged area as defined by EJSscreen and/or CEJST). Additional sites will be identified using the brownfield inventory and community/stakeholder input and will be prioritized based on how similar demographic and environmental justice conditions around additional sites are to the FIZ. Like the FIZ, demographics in the rest of the areas in the census tracts mentioned have significant environmental justice challenges and are considered disadvantaged.

1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans: The 2012 Toa Alta Territorial Plan, 2012 Land Use Plan, and 2020 Hazard Mitigation Plan (Revitalization Plans) specify the reuse of vacant and underutilized properties as a high priority, specifically urban infill by developing consolidated communities through quality municipal infrastructure (roads, parks, government offices, etc.), and well-planned commercial and residential expansion. Acquiring four long-abandoned industrial structures in Toa Alta and redeveloping them as planned aligns with Toa Alta’s Territorial Plan by supporting goals of balanced urban expansion, economic stimulation, and improved quality of life for residents. The plan emphasizes organized growth, revitalization of urban areas, and enhanced amenities to attract both new residents and businesses. Additionally, such developments will help mitigate the issues stemming from urban sprawl and contamination while supporting local employment, aligning with the municipality’s vision of a cohesive, sustainable, and vibrant community. Toa Alta’s Revitalization Plans emphasize improving residential and workforce development, both of which will benefit from new commercial and residential tailored to market demands. The proposed

market square will offer fluid, interactive spaces for local farmers, artisans, and manufacturers to bring their products to neighboring communities, providing sustainable urban and rural connectivity and stimulating our most valuable commercial sectors: agriculture, manufacture, and service.

Toa Alta is requesting \$500,000, most of which will be used for Phase I and Phase II Environmental Site Assessments (ESAs), providing the initial, highest risk investment necessary to access leveraged funds. These funds will help us reach reuse goals in our Revitalization Plans, tackling environmental challenges associated with the highest priority sites within the FIZ, triggering further environmental and redevelopment funding (1.c.i). Increasing our stock of employment and housing available and readily accessible in the FIZ will alleviate a prevailing problem experienced by our most vulnerable populations. Local accessible market space will foster the conservation of our agricultural heritage, and in connection with nearby office and culinary spaces will result in an integrated district that will attract local and external investment. Significant resources have already been pledged for reuse of FIZ properties (1.c.i), including a leveraging commitment for the reuse of these industrial sites that have been in disuse for too long. With EPA funds to cover environmental assessment and planning costs, we will realize the outcomes and benefits outlined below.

1.b.ii Outcomes & Benefits of Reuse Strategy: These industrial sites lack data on past operations, chemicals used, and contamination controls, posing a potential hazard (PCBs, metals, petroleum, PFAS, VOCs, PAHs, lead paint). Phase I ESA site visits performed under the FY20 assessment program found recognized environmental concerns in all three of the industrial sites that were evaluated and revealed use of two of the priority sites as a hub for illicit activities and unrestricted dumping of solid waste. The existence, extent, and magnitude of the contamination is, as of yet, unknown, but assessment and, subsequently, remediation will remove this risk and ensure community safety. After which, **the full redevelopment of Table 1 priority sites will create an estimated 360 construction jobs, 165 permanent jobs, an estimated \$1.6M in annual tax revenue, and eliminate threats to less fortunate and vulnerable residents.** We estimate this redevelopment will boost property taxes by 5% in the area and bring over \$9.8M to the local economy through increased spending, jobs, and tax revenue. Removing blight will help end criminal activity (2.a.i) that is lured by abandoned property.

During all phases of the revitalization process, we will encourage the reuse of existing buildings and infrastructure, implementing building codes that require or promote energy efficiency measures: energy efficient lighting, low-flow showers/toilets, geothermal heating/cooling, etc. Addressing priority sites in the FIZ will supply our vulnerable residents with needed services, workforce development (new jobs), and remediate/reduce legacy pollution in areas with high concentrations of low-income residents. **EPAs investment in brownfields in the FIZ will help meet Justice40 goals by creating energy efficient, sustainable development, conserving and preserving greenfields, improving health by reducing exposure to contaminants, and turning brownfields into assets. This will deliver justice to disadvantaged residents (due to low-income, high minorities, distressed neighborhoods, disproportionate exposure to environmental impacts from brownfields, etc.).**

1.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: The municipality has a history of leveraging investment in projects throughout the community. For example, Toa Alta has leveraged over \$50.4M in grant funding to improve energy and stormwater infrastructure, strengthen resiliency hubs, and repair roads and bridges in recent years to help revitalize the community. Our Municipality currently has \$4.4M available to invest in the FIZ. In addition, Toa Alta is eligible for and will seek additional funding from the following sources that support anticipated assessment, cleanup, infrastructure, and redevelopment: EPA Brownfield Clean-up and Multipurpose grant funds (\$2M/\$1M), US Dept. of Agriculture Rural Economic Development Loans and Grants (\$300K grants/\$1M in loans for community and economic development aid), Community Development Block Grants (CDBG), CDBG-DR (Disaster Relief) of which over \$9M is available to Toa Alta for demolition, infrastructure, and economic development of brownfields, Federal Emergency Mgmt. Agency (FEMA) (over \$37M available for hurricane-related clean-up and redevelopment), US Economic Development Administration (USEDA), Dept. of Transportation (DOT) grants, and new funding opportunities/incentives available in the future. Funding from these resources is available for remediation, demolition, site development, infrastructure improvements, streetscape improvements, building rehabilitation, job training, etc., to encourage and complete our reuse strategies. Should EPA funds be awarded for environmental assessment, the EPA grant qualifies as required match to CDBG-

DR, FEMA, and other funding discussed above, further leveraging resources for brownfields redevelopment. Additionally, some funding sources require environmental assessment prior to becoming available and would be unlocked with the use of EPA assessment funds on the properties.

We will also seek funds from the 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. As properties are assessed, it will stimulate partnerships with many agencies (U.S. Dept. of Housing and Urban Development (HUD), FEMA, PR Dept. of Housing, PR Dept. of Economic Dev. & Commerce, etc.) to fill funding gaps such as demolition funding and reuse incentives, ensuring successful redevelopment. A detailed funding plan will be developed based on individual status and eligibility for each brownfield site or area as assessment projects are realized. CDBG, CDBG-DR, and FEMA funds were just recently released, and we will seek to utilize them immediately. Other funding noted above will also be sought as it becomes available. These funds coupled with the EPA Assessment Grant will enable us to realize and document revitalization success within the next 2-4 years.

1.c.ii. Use of Existing Infrastructure: Our Revitalization Plans emphasize the build-out of existing parcels, and rehabilitation and infill before additional land is considered for development. For example, some buildings at the former coffin and Industrial Bldg. T-0149-0-52 are in excellent condition, thus redevelopment will be quickly accomplished once environmental assessment is complete. All priority sites have utilities, and is robust enough to handle the added capacity and need brought by the planned redevelopment in the FIZ, with 3-Phase electricity, water and sewer services, telephone, and fiber optic service present. Redevelopment will utilize these existing services and other physical infrastructure such as roads, curb cuts, parking, and commercial corridors (PR-155 & PR-157) to attract new investment in area brownfields, reducing redevelopment costs of these sites. Traditional transportation infrastructure is actively being complemented by pedestrian connectivity, bicycle improvements, and universal accessibility as per our Revitalization Plans. Ongoing efforts to improve infrastructure will also be useful and benefit from brownfields redevelopment progress. For example, existing infrastructure currently servicing road PR-165 is sufficient to support the mixed-use commercial/residential projects planned. Existing infrastructure will allow for easy access to the development and enable residents the opportunity to work and live in the same neighborhood. Additional funding for roads, trails, or infrastructure necessary for planned reuse will be sought from the US DOT Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Grant program, the Infrastructure and Jobs Act, commonwealth funds (when available), and CDBG funds.

2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding: Toa Alta does not have funds for site assessments in our budget. The only available resource to address brownfield assessments is federal funding. A large portion of our community is low income, with **49.6% of FIZ residents falling below the poverty line and a MHI 4X less than the US (2.a.ii.)** making brownfields investment an impossibility for us. The large number of vacant buildings on FIZ brownfields has resulted in an estimated twofold increase in crime within the FIZ compared to other parts of Toa Alta (per community estimates), further limiting local government resources due to additional public safety services (police and fire calls) to brownfields. After over 15 years of setbacks and significant economic decline, we have fewer jobs, reduced tax revenues, damaged infrastructure, and limited local government resources. A recession has also left the territorial government with no resources to commit to brownfields. Locally, we estimate tax losses to be over \$2.9M/year, and more than 500 jobs were cut after changes in US tax code and recent hurricanes. Toa Alta operates on a \$14.0M annual budget, which cannot fully fund essential services, let alone needed infrastructure repair. Moreover, local governments in PR do not have funding resources commonly available to governments on the mainland (e.g., Tax Increment Financing). Incentivized redevelopment through funding environmental due diligence is attractive to developers, but we lack tools at a local or territorial level. Brownfield sites add to financial burden borne by residents, suppressing property values and adding to municipal expenditures through reduced tax base and increased public safety services to brownfields for criminal activity as indicated by the high crime in the FIZ (65% of total crime in Toa Alta).

2.a.ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations: Our community's most sensitive populations (minorities, low-income residents, and individuals living in poverty, especially children & elderly), live in and around often unsecured FIZ brownfields and risk

exposure to toxic chemicals, asbestos, soil and groundwater contamination, and unsafe structures. According to the 2022 ACS, 46.9% of FIZ residents are living in poverty, and MHI is just over 1/4 of the United States (Table 2), Target area residents suffer dramatic wage disparities, as observed with our sensitive populations, such as children and the elderly. Toa Alta, especially in the FIZ, has a very high percentage of minorities. This is more evident in the FIZ, where nearly all of the population is minority.

Table 2	US ¹	PR ¹	FIZ¹
Median Household Income	\$75,149	\$24,002	\$21,153
Percent Minority	40.6%	99.1%	99.6%
Individuals Living in Poverty	12.5%	42.2%	46.9%
Children Living in Poverty	16.7%	56.2%	65.0%
Elderly Living in Poverty	10.0%	38.8%	43.5%
¹ Stats from 2022 ACS			

Proximity to FIZ brownfields is potentially causing harm to our sensitive populations in area schools and recreational spaces, some of which adjoin some priority sites. Our priority sites are believed to be impacted with metals, PFAS, VOCs, PAHs, PCBs, lead paint, asbestos, and other contaminants (i.e. Industrial Bldg. T-0149-0-52 and Former PharmaSeal) known to cause cancers, asthma, and low birth weight, all experienced by Toa Alta'

residents at a higher rate than the nation (see 2.a.ii(2)). An infusion of funding from this EPA grant will provide capital for the assessment of blighted properties, clearing the way for remediation and revitalization of the FIZ to include much needed commercial options, infrastructure repair, community services, and greenspace. This grant will better inform us of the environmental conditions at our brownfields by considering impacts on neighboring properties when developing reuse plans. Risk of exposure will be reduced, sources of contamination will be eliminated, the ecological health of our community will be improved, and livability and equitable development principles will be incorporated.

2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: "From 2017 to 2021, incidences of cancer in the FIZ for the kidney and renal pelvis, brain and nervous system, and liver and intrahepatic bile ducts were 6.4%, 3.3%, and 10.2% higher, respectively, than the average rates in Puerto Rico (PR Central Cancer Registry)." 79.15% of the housing stock was built prior to 1979 (2022 ACS) and older homes have a greater risk for high lead levels from paint. Mercury, lead, and other metals, as well as lead paint, asbestos, VOCs, PAHs, and petroleum constituents are believed to be present on priority sites. These are linked to higher incidences of cancer, kidney disease, and asthma and known to be a threat to unborn children and infants. Infant mortality and low birthweight rate in Toa Alta is 11.4% higher than the US, and low birthweight rate in Toa Alta is 2.3% higher than PR, according to the CDC and the PR Dept. of Health. The Bayamon region (which includes Toa Alta) ranks 1st in PR for lifetime asthma incidence, while PR ranked 10th highest (among 54 states and territories) in the US (CDC). Sites such as the former coffin and carton factories are impacted by contaminants (PFAS, PCBs, PAHs, and metals) the Center for Disease Control (CDC) links to digestive system cancer. Currently, there are 22 Toa Alta properties within EPA's regulated facilities database. **Identification and removal of environmental contaminants present at brownfields in our target area will reduce exposure of our underserved populations to these materials and in turn, reduce disproportionate incidences of disease and other poor health outcomes residents currently experience.**

2.a.ii(3) Environmental Justice (a) Identification of Environmental Justice Issues: The proximity of brownfields to low-income neighborhoods in our FIZ drives down housing values, suppresses commercial investment, and limits residents' access to adequate employment, resulting in a disadvantage for residents. The public health impact from FIZ brownfields and industrial operations, and their proximity to our underserved populations, including low-income and minority residents, has disproportionately exposed them to environmental pollutants, resulting in an inability to maintain their health and wellbeing. **EPA's EJScreen tool indicates that FIZ residents are in the 92th and 98th percentile for Toxic releases to air; 78th and 90th percentile for Lead Paint, 94th and 99th percentile for Superfund Proximity, 97th and 99th percentile for Wastewater Discharge, 60th and 87th percentile for Traffic Proximity, 56th and 88th Proximity to Risk Management Plan facilities; and 78th percentile for Hazardous Waste Proximity compared to the US and PR.** The CEJST identifies the FIZ as disadvantaged for 4 categories including: energy, housing, water and wastewater, and workforce development due to lack of indoor plumbing; energy cost; wastewater discharge proximity, low income/poverty; low high school education and high unemployment. These conditions have a direct impact on the health, prosperity, and wellbeing of FIZ residents, as evidenced by their poor health (2.a.ii(2)), poverty status (2.a.ii(1)), exposure to environmental contaminants, etc. **All the FIZ priority**

sites in 1.a.ii are located within a disadvantaged community (as identified by CEJST).

2.a.ii(3)(b) Advancing Environmental Justice: Brownfield assessment, cleanup, and reuse strategies will improve the welfare of our sensitive populations in the FIZ by identifying and eliminating the health risks they pose. The EPA grant will play a crucial role in this, reducing threats by funding environmental investigation needed to trigger stalled cleanup and end disinvestment in the FIZ. Repurposing the industrial sites and trucking depot will provide needed mixed-use commercial and residential development, and greenspace in the community. Assessing lead-based paint will spur other federal programs (e.g., CDBG) to help fund abatement and other improvements. New tax revenue will be generated and reinvested in the community. The redevelopment of these industrial sites will create employment opportunities for FIZ residents and bring more tax revenue when redevelopment is complete. 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 jobs in our target area will create gainful employment for residents. **Health indicators such as cancer deaths and kidney disease, childhood asthma, and low infant birthweight (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 concentrated, supporting environmental justice for all Toa Alta residents.** To minimize the displacement of underserved residents and businesses, reuse plans will include service centers for residents who often do not have access to these in the wake of heavy rains, hurricanes and other climate-change related events. Similarly, planned redevelopment will also offer competitive-wage jobs and attract consumers through commercial development. Residents will be involved in the planning through community engagement, where their input into brownfield design and reuse will be sought.

2.b. Community Engagement, i. Project Involvement & ii. Project Roles: Several community organizations have pledged supporting roles for our brownfields program and grant (Table 3). This diverse assemblage of community groups is suited to engage stakeholders at a grassroots level. They have regional influence, local ties, and regularly engage in community engagement meetings held within the municipality, maximizing the benefits they bring to the project. A brownfield committee is being assembled from active residents, members of the public, developers, etc., to provide input into the inventory and site prioritization, reuse plans, economic development, and community engagement efforts, etc. The committee will meet 2-4 times/year to discuss our brownfields program.

Table 3 – 2.b.ii – Project Partners and Roles

Partner Name	Point of Contact	Description and Project Roles
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 homes 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
Toa Alta Department of Public Works	Jose Rodriguez Ortiz jorodriguez@ciudadtoaalta.com 787-870-2100 ext. 1622, 1620	Municipal department in charge of public works who will provide input during cleanup/reuse planning to address the needs of assessed sites and oversee the redevelopment of the property, providing project progress updates at community engagement events

2.b.iii. Incorporating Community Input: Toa Alta has a culture of community involvement that we will maintain throughout this grant. **A total of 8-12 public meetings will be held during the 4-year grant period** to maintain stakeholder engagement and continue to gather input on site selection, prioritization, assessment needs, cleanup decisions, mitigation measures from the cleanup and redevelopment activity,

and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms, ensuring that the entire community has an opportunity to provide input. In the event social distancing or other restrictions limit in-person community meetings, we will follow existing recommendations/guidance including EPA's Office of Land and Emergency Management *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). The community will be updated on progress throughout the grant and will have the opportunity to share input through comments on municipality and community partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community input without access to digital resources. Currently, a citizen participation mailbox is available 24/7 to all our population, this has proven useful in receiving feedback when all other measures are not feasible to residents. The municipality has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages. We have begun engaging FIZ residents, business owners, not-for-profits, churches, and other community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, 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 through the Municipal Planning & Zoning Department, with help from the PR Dept. of Economic Development to bring awareness of the redevelopment opportunities priority sites offer. When developers are identified, they will be invited to attend public meetings to describe their plans for reuse. As a project progresses, we will involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on reuse. As stakeholder input is received, we will evaluate it against our development goals and available resources, adopting input that feasibly meets these criteria.

3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities &

Outputs: Toa Alta will begin activities immediately upon award confirmation, working to prepare a Work Plan approved by the EPA PM/PO. No subawards or participant support costs are planned. After the Cooperative Agreement period begins, Toa Alta and its QEP will complete the following tasks:

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

i. Project Implementation: Toa Alta staff will travel to the PR Brownfields Week and the National Brownfields Conference, participate in calls, meetings, and correspondence between Toa Alta, QEP, EPA, etc. to manage the grant's Cooperative Agreement. 8-12 public meetings to update communities on the grant and seek public input and involvement; supplies: printed flyers, advertising, postage, etc. We will complete Quarterly, DBE, Annual reports, and ACRES database entries, and will track contractor costs, comparing to the budget, expenditures, project progress, and milestones to ensure timely expenditure of funds within the prescribed 4-year project period. Toa Alta, with QEP support, will continue to develop a brownfield inventory and will use it to help accomplish reuse goals. Inventoried sites will be prioritized based on criteria discussed with stakeholders: 1) reuse potential, 2) environmental or health impact and environmental justice (EJScreen and/or CEJST), and 3) community input. Additional sites will be identified by Toa Alta, community leaders, local governments, redevelopment investors, and through community outreach. Priority will be granted to sites within disadvantaged communities (as identified by EJScreen and/or CEJST and sites near residential areas that pose health risks to underserved communities. Priority will also be considered for sites that have a higher chance of redevelopment and a greater economic impact potential within our target area.

ii. Schedule: QEP will be selected through a competitive bidding process (compliant with federal procurement regulations - 2 CFR 200.317 - 200.326 and "Brownfield Grants: Guidance on Competitively Procuring a Contractor – May 2023") before Cooperative Agreement begins; correspondence will occur at least monthly (more frequently as specific project activities require) throughout the grant; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder of the grant; ACRES updates will be conducted at least quarterly throughout the grant.

iii. Task/activity Leads: Toa Alta & QEP

iv. Outputs: Travel-Municipal staff to regional/national brownfields conferences/meetings; prioritized inventory; project performance reports: 16 Quarterly Reports, ACRES entries, 4 DBE reports, 4 annual financial reports, etc.; calls, meetings, and correspondence between Toa Alta, QEP, EPA, etc. to manage the grant's Cooperative Agreement.

Task/Activity 2: Environmental Investigation

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

ii. Schedule: Obtain site access, request eligibility determinations & finalize site access to initial sites for investigation-early 2nd Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 15th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted-45 days before end of grant period.

iii. Task/activity Leads: Toa Alta & QEP

iv. Outputs: 12 Phase I ESAs; QAPP and SAP/HASP; estimated 9-11 Phase II ESAs.

Task/Activity 3: Clean-up/Reuse Planning:

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

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

iii. Task/activity Leads: Toa Alta & QEP

iv. Outputs: 6-10 cleanup planning and/or reuse documents and 1 design charette/visioning session.

Task/Activity 4: Community Outreach & Involvement:

i. Project Implementation: 8-12 public meetings will be held during the grant period to update the community on ESA progress and seek public input/involvement. Print and mail material for project/site information and marketing documents will also be funded under this task. The municipality will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program and will attend/participate in outreach events. Social media outlets and other online media will be developed/maintained, and outreach efforts will inform the public on the progress of investigation/cleanup planning activities and provide marketing resources for future development. Additional sites will be identified during public community outreach meetings. These meetings will be focused on public engagement including what sites the community views as a priority for redevelopment. Priority will be granted to sites identified by underserved communities, especially when those sites are within communities identified as disadvantaged by the EJSscreen and/or CEJST.

ii. Schedule: 2-4 brownfield committee meetings planned per year and 2-3 public meetings planned per year with the 1st planned for the 2nd Quarter of the grant period.

iii. Task/activity Leads: Toa Alta & QEP

iv. Outputs: 8-12 public meetings to update the community on the brownfield assessment progress and seek public input and involvement; 8-16 brownfield committee meetings to provide input into the inventory and site prioritization, reuse plans, economic development, and community engagement efforts; supplies: printed flyers, advertising, postage, etc.

We will work diligently to assure startup activities are completed per the tasks and schedule above. The municipality will allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the 4-year Cooperative Agreement contract. Because there is a high demand for assessments and site access has already been obtained for two of the priority sites in Table 1, it is likely that funds will be spent prior to the end date. We are proactively communicating with representatives of privately-owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such

communication initiates the process for eventual property transfer and redevelopment. These discussions create a positive dialog between property owners, local government, and impacted citizens.

3.b. Cost Estimates: We will allocate \$399,500 to Phase I and II ESAs (or 80% of total grant funding assigned to ESAs). The costs outlined in Table 4 were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in Table 1.

Table 4 Budget	Budget Categories ¹	1. Program Mgmt, Training Support, Inv / Prioritization	2.Phase I / II ESAs	3. Clean-up / Reuse Planning	4. Community Outreach & Involvement	Budget Category Total
Direct Costs	Personnel	\$4,310.16	0	\$522.84	\$794.71	\$5,627.71
	Fringe Benefits	\$1,442.55	0	\$175.15	\$266.59	\$1,884.29
	Travel	\$4,000.00	0	0	0	\$4,000.00
	Other	0	0	0	\$413.00	\$413.00
	Contractual ²	\$20,995.00	\$399,500.00	\$55,000.00	\$12,580.00	\$488,075.00
TOTAL BUDGET		\$30,747.71	\$399,500.00	\$55,697.99	\$14,054.30	\$500,000.00

¹Table 4 only includes budget categories with costs. ²In accordance with Federal, State, and local procurement regulations.

Tasks will be completed at the anticipated unit costs with the following anticipated outputs/outcomes:

1. Program Management & Training Support, Inventory/Prioritization: \$30,747.71 – **Travel:**

Attend National Brownfield Conf.: airfare x 2 @ \$1,400, 2 rooms, 3 nights lodging @ \$1,700, meals @ \$650, ground transportation @ \$250 = \$4,000, **Administrative:** total \$4,310.16, includes work by the Director of Federal Programs (annual salary \$43,500), committing 95hrs for project management = \$1,986.78; and the Director of Finances (annual salary \$50,340), committing 96hrs = \$2,323.38 for a total of \$4,310.16, **Fringe Benefits:** total 1,442.55, calculated at 33.5%, including Retirement 20%, Soc. Sec. 6.20%, Medicare 1.45%, Unemployment Insurance 4.40%, State Ins. (FSE) Workers Comp. 1.45%, **Contractual:** total \$20,995, includes approximately 125 hrs. \$85/hr. = \$10,625 for inventory, & approximately 122 hours \$85/hr. = \$10,370 for program mgmt.

2. Env. Investigation: \$399,500 – **Contractual:** 10 Phase I ESAs at an average cost of \$3,800 each = \$38,000, & 10 Phase II ESAs at an estimated cost of \$30,000-\$45,000 (depending on site complexity/environmental conditions) = \$361,500 (@ \$36,150 average cost). Large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in 1.a.ii.

3. Clean-up & Reuse Planning: \$55,697.99 – **Contractual:** 6-10 ABCAs/clean-up plans, \$5,000 each = \$40,000. 1 Design Charette expected to cost \$15,000 each = \$15,000. **Administrative:** total \$522.84, Director of Federal Programs committing 25hrs for planning; **Fringe Benefits:** total \$175.15.

4. Community Outreach & Involvement: \$14,054.30 – **Other:** printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = \$413.00, **Contractual:** approx. 148 hours at an estimated \$85/hr. = \$12,580. **Administrative:** total \$794.71, Director of Federal Programs committing 43hrs for outreach activities; **Fringe Benefits:** total \$266.59.

3.c. Plans to Measure & Evaluate Environmental Progress & Results: We will track, measure, and evaluate progress through meeting minutes, progress and budget tracking spreadsheets, Quarterly and Annual Financial Reports, quarterly review/analysis of grant performance, ACRES entries, monthly operations review/progress reports, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in 3.a. are not being met, we will create a corrective action plan to identify deficiencies and make appropriate adjustments to achieve the outputs on schedule. Further, we will have the following measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels, acreage made ready for greenspace/recreation, and leveraged monies. These and other statistics will be included in quarterly reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program's progress/success. At grant closing, Toa Alta will provide a final report to the EPA and our residents summarizing project outputs and outcomes. After environmental work is complete, it is in Toa Alta's best interest that redevelopment happens, therefore, close monitoring of subsequent actions will be done diligently. Outputs and outcomes following the close of the grant will be uploaded to EPA's ACRES for continued monitoring of the program's success.

4. Programmatic Capability & Past Performance, a. Programmatic Capability, i. Organizational Capacity, ii. Organizational Structure & iii Description of Key Staff: The Federal Programs

Departments of the Municipality will handle most programmatic management activities and will seek assistance from a QEP, as needed. These offices have previously managed many other economic development resources valued at well over \$52M over the past 6 years, including the FY20 EPA Brownfields grant referenced in 4.b. These offices, along with other municipality staff, have the technical, financial, and administrative ability in place to implement this grant project successfully. Mr. Miguel Fonseca, Director of Federal Programs will serve as the Municipality's Grant Manager. Mr. Fonseca has managed similar programs for over 3 years, with experience directing several CDBG programs for the municipality. Mrs. Eris Galan will be assisted by a comprehensive team with ample experience overseeing federal, local, and municipal funds for development, planning, housing, recycling programs, etc. Ms. Aracelis Suarez Alejandrino, Office of Finances Director, will serve as the Grant Financial Manager responsible for accounting and financial reporting. She has been with the municipality for 8 years and served as manager for many other grant and loan programs for the municipality. The Office of Planning and Office of Economic Development will provide grant management support, as needed. In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of the municipality's team will allow for a seamless transition to other experienced members.

These offices are managing the use of federal recovery funds for vital infrastructure repairs, with over \$50.4 million allocated to projects following Hurricane Maria and \$2.1 million for Hurricane Fiona recovery. Completed and ongoing projects include road, public building, and water facility restorations. Future efforts, supported by the Hazard Mitigation Grant Program, focus on reducing disaster risk.

4.a.iv. Acquiring Additional Resources: The aforementioned staff will oversee the QEP procurement process and the acquisition of additional resources. Through a competitive bidding/procurement process, we will select a QEP according to federal procurement regulations (2 CFR 200.317 through 200.326 and "Brownfield Grants: Guidance on Competitively Procuring a Contractor – May 2023") and experience conducting environmental investigation and working with the PR Department of Natural and Environmental Resources (DNER). We will make every effort to contract with Disadvantaged Business Enterprises (women and/or minority owned) and consultants/contractors who employ disadvantaged people, when possible, and we will require our QEP to make every effort to do the same. Toa Alta will also engage with Invest in Puerto Rico, a nonprofit investment promotion organization created by law, via Act 13–2017 to increase investment in the region. The team and execution plan outlined above will ensure timely and successful expenditure of funds within the 4-year project. As appropriate, we will utilize visioning sessions and other assistance/advice offered by the Technical Assistance for Brownfields (Region 2 TAB) to maximize the incorporation of community input. We will work with the PR Small Business Administration (PRSBAs) to identify small businesses in the area with strong labor practices who have been vetted by the PRSBAs as qualified to perform remediation activities and other contracted services. We will invite the vetted contractors through the competitive bidding process noted above. We will also work with PathStone (see 2.b.iii) to link our community members to job opportunities related to the investigation, remediation, redevelopment, and ultimate reuse of brownfields.

4.b. Past Performance & Accomplishments, i. Currently Has Received an EPA Brownfields Grant (1)

Accomplishments: Toa Alta previously received an FY20 EPA Brownfields Assessment Grant (BF96243320-1) for \$300K. Skillful execution of the Work Plan thus far has resulted in inventorying and prioritizing at least 35 properties and the completion of 13 Phase I and 9 Phase II ESAs. At the time of this submission, all outputs and outcomes related to the grants have been met and are accurately reflected in the ACRES, which will continue to be updated after grant closeout. To date, \$4.4M been leveraged for the redevelopment of these sites as funding is secured for acquisition and demolition, and plans are underway to redevelop six properties, including three sites in the process of being developed into a commercial, residential, and recreational district in the heart of the urban center. An extension was requested, and granted, due to delays in the acquisition of 3 priority sites. Acquisition is currently in process, and the balance of grant funds will be expended immediately following the municipalities ownership of the sites, anticipated within the next few months.

4.b.i.(2) Compliance with Grant Requirements: Toa Alta's grant opened 10/1/20 and over 72% of funds were expended by the end of the grant period on 9/30/24. All Work Plan approved activities were completed, and all CA terms and condition/deliverables (Quarterly Reports, annual financial reports, MBE/WBE reports, etc.) were completed on time.

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 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. 8 to 12 outreach events (2-3 per yr.) will be held throughout the grant period to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures from cleanup/redevelopment activity, and reuse planning. Outreach events, open to the general public, will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. When social distancing or other restrictions limit in-person community meetings, we will follow existing recommendations/guidance including EPA's Office of Land and Emergency *Management Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants* that discusses Virtual Tools (online meeting platforms, social media, QR codes, web page or email updates, etc.) and Non-Digital Approaches (phone or conference calls, flyers, newspaper ads, local TV, and radio, etc.). See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

III.B.3 Expenditure of Existing Grant Funds

The Municipality of Toa Alta is a current EPA Brownfields Assessment Grant recipient. The Municipality of Toa Alta received a FY20 EPA Brownfields Assessment Grant. Draw down for over 70% of that Assessment Cooperative Agreement was completed by 09/30/2024. Documentation is attached.

III.B.4 Contractors and Named Subrecipients

The Municipality of Toa Alta has not procured/named any contractors or subrecipients.