

IV.D. Narrative Information Sheet

1. Applicant Identification:
Municipality of Naranjito, Puerto Rico
P.O. Box 53, Naranjito, P.R. 00719-0053
(787) 869-2200
2. Funding Requested:
 - a. Grant Type: Multipurpose
 - b. Federal Funds Requested:
 - i. \$1,000,000
3. Location:
 - a. Municipality of Naranjito
 - b. Naranjito
 - c. Puerto Rico
4. Target Area and Priority Site/Property Information
 - a. Target Area: Mountain District (MD)
 - b. The Mountain District is contained within portions of **Census Tracts (72105520100, 72105520200, 72105520300, and 72105520400)** consists of the urban center of Naranjito and surrounding mountainous areas. The majority of the MD is rural, agricultural land.
 - c. Priority Sites Addresses:
 - i. Site 1 (Former hospital) – 136 Georgetti St., Barrio Pueblo, Naranjito, PR 00719
 - ii. Site 2 (Gas Station #250) – PR167, Km 7, Barrio Nuevo, Naranjito, PR 00719
 - iii. Site 3 (El Cerro) – Georgetti St., Barrio Pueblo, Naranjito, PR 00719
 - iv. Site 4 (Fidel G. Padilla School) – PR 825, Km 3, Bo Achioté, Naranjito, PR 00719
 - v. Site 5 (Don Manolo School) – PR 815, Naranjito, PR 00719
5. Contacts:
 - a. Project Director:
Mr. Pedro Santiago-Rodríguez, Director of Federal Programs
Municipality of Naranjito
P.O. Box 53 Naranjito, P.R. 00719-0053
(787)-227-0129
psantiago@municipiodenaranjito.com
 - b. Chief Executive/Highest Ranking Elected Official
Orlando Ortiz Chevres, Mayor
P.O. Box 53 Naranjito, P.R. 00719-0053
(787)-869-2200
oortiz@municipiodenaranjito.com
6. Population: Municipality of Naranjito – 29,241 (US 2020 Decennial Census)

7. Other Factors Checklist

Other Factors	Page#
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority 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 4
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Page 3
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 (2012 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority.

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

9. The Municipality of Naranjito 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

20 OCT 2023

Hon. Orlando Ortiz-Chevres
Mayor
Municipality of Naranjito
PO BOX 53
Naranjito, PR 00719

Honorable Mayor Ortiz Chevres:

ACKNOWLEDGMENT LETTER FOR THE INTENTION TO APPLY FOR FY-24 US EPA BROWNFIELD'S PROGRAM FOR A COMMUNITY-WIDE HAZARDOUS SUBSTANCES ASSESSMENT AT THE MUNICIPALITY OF NARANJITO, PUERTO RICO

The Department of Natural and Environmental Resources (DNER) Superfund Program has received a letter from the Municipality of Naranjito informing us of its intention to apply for a Brownfields Multipurpose Grant. DNER acknowledges and supports the initiative taken by the municipality.

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

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

Cordially,

Anaís Rodríguez Vega
Secretary
OESS/EOMS

C Teresita Rodríguez, USEPA

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

The Municipality of Naranjito (municipality) is in central Puerto Rico (PR), 20 miles southwest of San Juan. Eligible activities will be conducted within municipality limits. Established in 1824, our municipality is working-class, known for agricultural (coffee, tropical fruits, poultry, and milk) and garment production. Our economy was vibrant, in part, due to Section 936 (936 exemption) of the US tax code, which incentivized US companies to operate on the island through valuable tax exemptions. The federal government eliminated the incentive in 2006, inducing companies to leave PR for more tax-friendly countries. PR's unstable economy coupled with climate-change induced natural disasters contributed to the demise of Naranjito's commercial and residential vitality, driving Naranjito into a deep recession that has lasted over 15 years, leading to job losses and population decline as people left for the US mainland for employment. Hurricanes (Maria-2017 & Fiona-2022) severely impacted Naranjito, exacerbating extreme socioeconomic and financial pressures. Hurricane-damaged and vacated industrial, manufacturing, and commercial properties became brownfields, releasing chemicals like lead paint, petroleum, and other environmental hazards. Redevelopment slowed even more as we were forced to reallocate resources to more urgent needs in response to the hurricanes. Unfortunately, many MD businesses could not reopen after the hurricanes, and the repeal of the 936 exemption forced more businesses to close and residents to leave.

Target Area: The Mountain District (MD) – At 1.6 square miles, the MD (Portions of Census Tracts 5201, 5202, 5203 & 5204) consists of the urban center of Naranjito and surrounding mountainous areas. The MD also includes portions of PR5, our primary link to San Juan, the largest commercial and industrial center in PR. Because of this linkage, it is critical that the MD maintain a diverse mix of commercial, industrial, and residential development. Once an economic backbone, the MD was left in tatters after Maria. All electric power and drinking water services were destroyed as were over 2,000 homes. 42% of commercial properties (many of which are now brownfields), 85% of municipally owned structures, and over 80% of the transportation infrastructure was severely damaged. Population in the MD dropped by 8% after Maria, from 21,121 in 2017 to 19,499 (2021 American Community Survey (ACS)). Many of the remaining residents struggle to find work as shown by the 7.5% unemployment rate, compared to the current unemployment in the US of 3.6% (August 2023, Dept. of Labor [most recent date available]). Those working are earning less - household incomes have decreased 4.8%, while there has been 22.2% inflation since 2017 (US Census & Bureau of Labor Statistics [BLS]). Residents in the MD experience low income (Median Household Income (MHI) is less than 25% that of the US) and high poverty (over 4 times higher than in the US) (see 2.a.ii).

The numerous brownfields in the MD expose residents to health risks from legacy pollution and blighted, crumbling structures and perpetuate a cycle of low-quality jobs; inadequate affordable housing; insufficient park/recreational space; and social and economic constraints that threaten physical and financial wellbeing of residents. Past economic struggles brought brownfield challenges: abandoned buildings, legacy pollution (Table 1), blight, increased crime, and strain on public resources, adding to the financial burdens (reduced income, increase poverty, lower tax revenue and wages, etc. – 2.a.i) and health disparities (higher cancer rates and infant mortality – 2.a.ii(2)) on our residents. These conditions have caused contraction of essential services and government resources, including the closing of the Don Manolo and Fidel G Padilla Schools. Once important community assets, they are now vacant and deteriorating. Businesses such as Caravana, Supermercado Selectos, Muebleria RM, Gatsby, and others have also closed in the past decade. These job losses (3,000) have left MD residents unemployed and living among empty, dilapidated brownfields. Since the economic downturn, the federal government made a significant investment to facilitate redevelopment and resilience in PR, including the MD, but much of these funds remain unusable until EPA grant funded environmental assessment and cleanup is completed on the properties targeted for reuse. Once priority sites are redeveloped, our economy will no longer be influenced by the negative impacts of brownfields.

Successful implementation of our 2019 Brownfields Assessment Grant positioned us to have a redevelopment-driven mindset and helped us create a Municipality Brownfield Program. With this and our Revitalization Plans as resources, we have focused efforts to invest in the MD, creating detailed reuse plans to maximize investments and leverage additional funding. Our Revitalization Plans (1.b.) recognize the need for new, modern development in the MD. We have put the pieces in place to implement a

strategy of creating modern mixed-use development, commercial investment, and housing that balances social, economic and environmental interests in an initiative to create sustainable, lasting development. We recognize the great redevelopment potential of the MD and are making a focused effort to address priority brownfields (1.a.ii) and leverage additional funding for this hardest hit part of our community where redevelopment investment has the greatest opportunity for success. Once our priority sites are redeveloped, they will serve as examples of success, triggering more investment. Already secured funds in the MD include the \$30.8M redevelopment of the Former Hospital, El Cerro, and Gas Station #250, which will all be completed once the environmental investigation/remediation is performed. An investment of EPA multipurpose funds used as the initial, high-risk due diligence investment, the likelihood of successful redevelopment is much higher. We will revitalize the MD, making our downtown and surrounding mountainous area more attractive to new businesses, developers, visitors, and residents.

1.a.ii. Description of the Priority Brownfield Site(s): The Municipality identified over 50 potential brownfields in the MD, totaling approximately 127 acres. Previous environmental assessments identified VOCs, PAHs, and metals in the soil and groundwater. Many of these sites adjoin neighborhoods, schools, and rivers, exposing our sensitive populations to contamination. Building upon our Naranjito Brownfields Program, the Multipurpose grant will fund redevelopment tasks, including 12 Phase I and 10-12 Phase II ESAs, three to five cleanups, six cleanup plans, and three site reuse plans. Sites were selected based on their impacts on environmental justice, environmental concerns, the potential for advancing our Revitalization Plans, and \$30.8M has already been secured from the municipality and private investors to redevelop properties (1.c.i). The following five sites are our highest priorities:

Site 1 (Former hospital): The municipality-owned 0.6-acre former hospital is located on the banks of the Guadiana River (and a floodway), just over ¼ mile upgradient of the urban center, a school, and low-income residential neighborhoods. The hospital operated from 1943 to 1995 and a portion of the site operated as a courthouse from 2013 to 2017. It has been vacant and rapidly deteriorating since then. A Phase II ESA (2020) performed under the Naranjito Brownfield Program funded by our FY19 EPA Assessment grant identified arsenic, cadmium, lead, and PAHs in an area where a suspected UST was identified, and lead-based paint was found in the site structures. The Municipality will use grant funds to conduct the environmental cleanup, enabling developers to complete construction of the 30-unit low-income housing development planned for the heart of the Municipality, in accordance with our Redevelopment Plans (see IV.E.1.b.i). The Former hospital is ready and waiting for funding to conduct the needed site cleanup. Once this is finished, redevelopment activities will immediately begin.

Site 2 (Gas Station #250): a closed 0.3-acre gas station located on the banks of the La Plata River is identified for redevelopment as a pump station to connect the Hevia Community to the Municipal Wastewater Treatment System. A Phase II ESA (2022) performed under the Naranjito Brownfield Program identified the following petroleum constituents: VOCs, PAHs, and Lead. As the only available option for installing the necessary pump station, the Municipality will acquire the property by early 2024 and use this multipurpose grant to complete supplemental assessments and perform necessary cleanup to support redevelopment. Funding for the development of the pump station and wastewater lines has already been secured (\$11M in federal funding from EPA's Clean Water State Revolving Fund).

Site 3 (El Cerro): with an area of over 27 acres, El Cerro is a community adjoining the urban center of Naranjito, it includes informal settlements and inadequate infrastructure leaving residents with limited access to goods/services and economic opportunities. Community partnerships and social advocacy efforts have identified the improvements that must occur. Funding and design plans are underway to revitalize the community, which include infrastructure (drinking water, electrical, walkways, etc.) repair, establishment of a solid waste transfer station and recycling area, and existing infrastructure improvement (lighting, recreational amenities, etc.). Environmental assessments and abatement of lead-based paint are anticipated needs for many structures in El Cerro to support the extensive renovation planned. The grant will provide the necessary funding for the environmental due diligence that will, in turn, secure the federal funding (CDBG) for the revitalization of this neighborhood.

Site 4 (Fidel G Padilla School) & Site 5 (Don Manolo School): The municipality will invest grant funds to complete environmental assessments and cleanup (if needed) of the Fidel G Padilla (1.6-acres) and Don Manolo (1.5-acres) Schools. These former schools have been vacant and deteriorating

since 2017. Contaminants such as PCBs, VOCs, PAHs, metals, asbestos, and lead paint are present on these sites, and both transect low-income neighborhoods. The Municipality currently owns the Fidel G Padilla school and is in the process of acquiring the Don Manolo School. Repurposing the schools as mixed-use housing and commercial development will address our housing shortage and align with our goal to increase the walkability/connection of our downtown to area neighborhoods. Developers have already expressed interest in creating affordable housing on these sites. Eliminating environmental concerns and providing developers with liability protection (BFPP protection) will incentivize already interested developers to commit to the projects.

1.a.iii. Identifying Additional Sites: If grant funds remain after addressing the target area/priority sites, we may choose to invest grant funding on properties outside the MD (but within the census tracts noted in Table 1 or census tract 5205) that become a priority during the grant period. Additional sites will be identified using the existing brownfield inventory and community and stakeholder input and will be prioritized based on how similar demographic and environmental justice conditions around additional sites are to the MD. Similar to the MD, demographics in census tract 9529 have significant environmental justice challenges and disadvantaged residents (95th percentile for low income, 91st for poverty, and 97th for unemployment per EPAs CEJST).

1.b. Revitalization of the Target Area, i. Overall Plan for Revitalization: The 2011 Naranjito Territorial Plan, 2012 Land Use Plan, and 2020 Hazard Mitigation Plan (Revitalization Plans) specify the reuse of existing vacant and underutilized urban space (brownfields redevelopment). Reuse of MD brownfields will help achieve these goals by diversifying and modernizing our commercial sector to minimize the impacts of future cutbacks/closures. An increase in low-income and elderly housing will provide residential stock constructed with modern techniques for people hardest hit by hurricanes. Climate adaptive infrastructure will provide water management, resilience to future severe weather events, and reduce future emergency response expenses. These redevelopment activities align with our Revitalization Plans and will directly address our broader needs by adding jobs and housing options, encouraging people to return to Naranjito from the mainland and attract residents from nearby municipalities.

Naranjito is requesting \$1,000,000 in grant funding, 98% of which will be used for site-specific contractual activities (site assessments, cleanup planning, and remediation), with 42% of the budget being allotted to site remediation, providing the initial, highest risk investment necessary for brownfields redevelopment. Funding will also be committed to improving/reprioritizing our brownfield inventory, perform community outreach activities, and cleanup & reuse planning. This approach will maximize grant value and trigger further environmental, redevelopment, and resilience work with other funding as noted in 1.c.i. Connecting the Hevia Community to the wastewater treatment system (\$11M in secured funding) is a long-term solution that will protect the environment (eliminate septic systems), improve climate change resilience, increase property value, accommodate future growth, and reduce future environmental and healthcare expenses. Commercial/residential mixed-use development on the Former Schools will add much needed retail space along the heavily traveled PR5 and PR825 and will fill the critical need for housing (along with the Former Hospital). The El Cerro revitalization will provide stormwater and waste management infrastructure, two of the main problems identified by residents. Short-term construction jobs will be created, and permanent jobs will be in place once the planned redevelopment of the priority sites is complete (1.b.ii).

1.b.ii Outcomes & Benefits of Overall Plan for Revitalization: The full redevelopment of priority sites will create 105 housing units, 160 construction and clean up jobs, 90 permanent jobs, and an estimated \$440K in annual tax revenue while eliminating threats to less fortunate and vulnerable residents. Redevelopment of Gas Station #250 and expansion of the municipal wastewater system will remove real environmental contamination (VOCs, metals, and petroleum constituents), and accommodate future growth and changing needs. Additionally, this development will eliminate a real threat to the adjoining river, a source of food and water for many communities north (downstream) of the site. The El Cerro reuse design details modern stormwater control features, alleviating unmanaged runoff and better preparing us for future heavy rain and other climate change induced events. It also includes a solid waste transfer station and recycling facility, improvement of water and electrical services, and improvement of green and recreational spaces. This will generate temporary construction jobs and

critical neighborhood improvements which will mitigate environmental justice concerns while preventing displacement of low-income minority residents. Creating a low-income housing complex in the Former Hospital and Fidel G Padilla School (45 housing units) will provide housing options needed for people seeking to relocate in Naranjito. The development of an elderly care and housing complex (60 units) at Don Manolo School will provide a safe and resilient space for this vulnerable group of our community to live and will create valued employment for caregivers, housekeeping personnel, maintenance, and administrators.

As brownfields are redeveloped, employment and revenue losses will be eliminated and replaced with economic growth throughout the community. Temporary jobs will be created through construction work to remediate and redevelop sites. Low-income housing will stimulate other area investment from the private sector, creating permanent jobs in the surrounding area. An EPA grant will help leverage the necessary funding for these planning and reuse efforts consistent with our Revitalization Plans. New, energy efficient construction on priority sites will reduce energy usage and operating cost on sites where new construction is planned (Former Hospital, Fidel G Padilla School, and Don Manolo Schools). Redevelopment will be consistent with the Puerto Rico “Renewable Energy Act” (Act 82, 2010) for stimulating the development of renewable energy and the Net Metering Program (Act No. 103, 2012), incentivizing the use of green energy infrastructure. Flooding caused by recent natural disasters heightened our awareness of needed flood mitigation measures. Integrating bioswales, water diversion/harvesting, and infiltration trenches in reuse design will protect new investment in our community from flooding induced by climate change. These measures combined with building codes integrating renewable energy use will better prepare us for future natural disasters.

Sustainable, commercial developments and land recycling opportunities will be created, leveraging current and future investments, and creating healthy, safe neighborhoods. Residents and commercial property owners will benefit from increased property value, improved energy efficiency, and lower maintenance costs associated with new construction. **EPAs investment in brownfields in the MD 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.).**

I.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: Target area redevelopment funding is secured for priority sites (\$30.8M in reuse funding commitment) from private investment and the municipality to redevelop these sites once environmental concerns are eliminated. Naranjito is eligible for and will seek additional funding from the following sources to carry forward reuse of the priority sites: US Dept. of Agriculture, CDBG, CDBG-DR (Disaster Relief), FEMA, EPA Brownfield Clean-up grant funds (up to \$5M), US Economic Development Administration (USEDA), Dept. of Transportation grants, and new funding opportunities and incentives available in the future. Funding from these resources is available for remediation, demolition, site development, public infrastructure improvements, streetscape improvements, building rehabilitation, reuse planning, market analysis, job training, etc., to encourage and complete our redevelopment strategies. Naranjito is already pursuing CDBG-DR funding to demolish the Fidel G Padilla building. Army Corps of Engineers resources will be used to improve the flood control measures on the Guadiana River, Dept. of Transportation to make road improvements, and the USED A to incentivize job creation. Should EPA funds be awarded, the EPA grant funding 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 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 manufacturing and commercial businesses as planned for some of our brownfields. We will market brownfields as excellent tax shelters under the Opportunity Zone tax incentives, attracting private funds in our low-income areas. We will attract investors for the Don Manolo and Fidel G Padilla School by leasing the sites while pledging transfer of title ownership to developers, which has been a successful strategy in the past. We will also attract investors using tax

credits through New Markets Tax Credit Benefits. As properties are assessed, we will partner with many agencies and entities (HUD, FEMA, PR Dept. of Housing, PR Dept. of Economic Development & Commerce, etc.) to fill in funding gaps such as demolition funding and redevelopment incentives, ensuring successful reuse. A detailed funding plan will be developed based on individual status and eligibility for each brownfield site or area as environmental projects are realized. San Juan Allocation funds were 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 Multipurpose Grant will enable us to realize and document revitalization success within the next 3-5 years.

1.c.ii. Use of Existing Infrastructure: The PR5 highway is the most heavily traveled in the municipality and provides connectivity from San Juan to the south side of the island. Modern utility infrastructure follows the corridor's path, providing available connectivity to all new development. Power lines and roads have been repaired or made more resilient since serious weather events like Maria and Fiona. Our utility infrastructure is large and robust enough to handle the added capacity and needs required by the planned redevelopment of the target areas. Redevelopment will utilize existing infrastructure such as roads, curb cuts, nearby utilities, and commerce routes (San Juan to southern Puerto Rico) to attract new investment in area brownfields, reducing site redevelopment costs. With revitalization ranging from residential to commercial, existing infrastructure will allow for easy access to commercial/industrial development, enabling residents the opportunity to work and live in the same neighborhood. For example, existing infrastructure (including the building) currently present on the Don Manolo School, adequately provides the service requirements to complete the planned elderly housing complex and retail. Additional funding for roads or other infrastructure necessary for planned reuse will be sought from the US DOT Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Grant program, the recently enacted Infrastructure and Jobs Act, local funds (when available), and CDBG funds.

2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding: Naranjito does not have the funds for site assessment and remediation in our budget. The only available resource to address environmental investigation/remediation is federal and (limited) commonwealth funding. A large portion of our community is low income, with **50.8% of MD residents falling below the poverty line and MHI is significantly lower than the US (2.a.ii.)**, making investment in our brownfields an impossibility for our community. After over 15 years of setbacks, resulting in significant economic decline, we have fewer jobs, reduced tax revenues, damaged municipal buildings and infrastructure, and limited local government resources. We estimate the tax losses locally to be \$2M annually, and 2,000 jobs have been lost in the past 5 years. The municipality operates on an \$8.2M annual budget, which can't fully fund essential services, let alone much needed infrastructure repair and maintenance. Simply collecting debris from the hurricanes exceeded \$12M in 2017-2018. Brownfield sites add to the financial burden borne by target area residents, suppressing residential property values, and adding to municipal expenditures through reduced tax base and additional public safety services to brownfield sites for criminal activity as indicated by the doubled crime rate in the MD compared to Naranjito as a whole. Because of the 15-year recession, capped by the destruction from recent hurricanes, the territorial government has no resources to commit to brownfields reuse. Moreover, local governments in PR don't have funding resources commonly available to local governments on the mainland (e.g. Tax Increment Financing), so incentivizing redevelopment by funding environmental due diligence is attractive to developers, but we have no tools available at a local or commonwealth level. Previous funds received by EPA for the assessment of brownfields made the redevelopment of two major projects in the municipality possible. Reuse of sites in 1.a.ii would become a reality with the availability of multipurpose funds from the EPA.

2.a.ii. Threats to Sensitive Population, (1) Health or Welfare of Sensitive Populations: For decades, Naranjito has suffered extraordinarily low wages and a very high poverty rate (Table 1). According to the 2021 ACS, 50.9% of MD residents are living in poverty, and MHI is \$16,590, 1/4 of the United States (\$69,021). It is clear that target area residents suffer dramatic wage disparities. Naranjito also has a very high minority population. This is even more evident in the MD, where nearly 100% of the population is minority. Our community's most sensitive populations (low-income residents, minorities, children & elderly (Table 1)), live in and around our MD brownfield sites that are often unsecured, and trespassers (including children) risk exposure to toxic chemicals, asbestos, soil and groundwater contamination, and

unsafe structures. Contaminants such as PCBs, metals, petroleum, VOCs, PAHs, glycols, lead paint, and asbestos are potentially causing harm to our sensitive populations. Contaminant pathways from brownfields (e.g. vapor intrusion, groundwater and surface water used for drinking, irrigation, etc., and

Table 1	US ¹	PR ¹	MD ¹
Median Household Income	\$69,021	\$21,963	\$16,590
Percent Minority	40.6%	99.1%	100%
Individuals Living in Poverty	12.6%	42.7%	50.8%
Children Living in Poverty	17.0%	56.3%	72.9%
Elderly Living in Poverty	9.6%	38.5%	40.9%
¹ Stats from 2021 ACS			

surface soil exposure) are a threat to residential neighborhoods. Historic development did not consider environmental impacts on nearby low income and minority neighborhoods, and now, contaminants suspected in our brownfields (1.a.ii) are potentially causing as yet unknown harm, raising significant environmental justice

issues. The result is the exposure of less fortunate residents to contamination present on these brownfields with little ability to improve their condition. **Two of our priority sites adjoin rivers that are sources of water and food for our communities. These sites are known to be impacted with VOCs, PAHs, metals, petroleum, and other contaminants known to cause cancer and infant mortality which are experienced by MD’s residents at a higher rate than the nation (2.a.ii(2)).** The proximity of large numbers of brownfields to low-income neighborhoods in the MD drives down housing values, suppresses commercial investment, and limits residents’ access to employment, resulting in a disadvantage to target area residents with no real relief in sight, if nothing changes. El Cerro adjoins a municipal park, introducing health threats to a large group of children (highly sensitive to contaminants such as lead paint, believed to be present on the site) through proximity to potential contaminants.

This grant will help better inform us of the environmental conditions on our brownfields. By considering impacts on neighboring properties when developing reuse plans, the 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: Sites such as the Industrial Site 1 and 2 are impacted by petroleum. According to the Center for Disease Control (CDC), exposure to petroleum affects the liver, while PAHs and nitrates are linked to colon and rectal cancer. Liver cancer mortality in Naranjito is nearly 23% higher than in PR, while cancer incidents in Naranjito (18.3/100,000) are 20% higher than PR (PR Cancer Registry). In addition, brain and blood cancers are 38% and 13% higher (respectively) in Naranjito than in PR. Over half (52.3%) of the housing stock in the municipality was built prior to 1980 according to the 2021 ACS, and older homes are a greater risk for high lead levels from paint. VOCs, PAHs, metals, lead, petroleum, asbestos, and other contaminants found on our priority brownfield are known to cause cancer and infant mortality. The stillbirth and infant mortality rate in PR is 25% higher than the US according to the CDC. Further, low birthweight in PR is 22% more common than the US (PR Dept of Health). Although infant mortality, stillbirth, and low birth weight data is not available at the municipality level, this data is representative of Naranjito.

Many operating commercial and industrial facilities add to the environmental threat due to the presence of toxic chemicals and their inevitable impact on the environment near residents’ homes. Currently, there are 40 properties in the municipality that have environmental records in the EPA’s EnviroFacts database. **Identification and removal of environmental contaminants at brownfields in our community will reduce exposure to our residents, which will help to reduce the disproportionate incidences of disease and other poor health outcomes that underserved populations are currently experiencing.**

2.a.ii(3) Environmental Justice (a) Identification of Environmental Justice Issues: The public health impact from target area brownfield properties and industrial operations, and their proximity to impoverished and minority residents has disproportionately exposed them to environmental pollutants, resulting in an inability to improve or in some cases, maintain their health and wellbeing. The EPA’s EJScreen tool indicates that the MD residents are in the 71st / 95th percentile for toxic releases to air, 83rd / 98th percentile for traffic proximity, 53rd / 81st percentile for lead paint exposure, and 83rd / 98th percentile for superfund proximity compared to PR and US respectively. The Climate and Economic Justice

Screening Tool (CEJST) identified all of Naranjito and the MD as a disadvantaged community in the climate change, energy, workforce development, and legacy pollution categories due to high unemployment and poverty, low educational attainment, projected flood risk, high school education, energy cost, and proximity to Superfund sites. These conditions have a direct impact on the health, prosperity, and wellbeing of MD residents, as evidenced by their poor health (2.a.ii(2)), poverty status (2.a.ii(1)), exposure to environmental contaminants, etc. **All MD priority sites in 1.a.ii are located within a disadvantaged CEJST census tract.**

2.a.ii(3)(b) Advancing Environmental Justice: Our brownfield assessment, cleanup, and reuse strategy will improve the welfare of our residents by identifying and eliminating the health risks from brownfields. The EPA grant will play an important role in this, reducing threats by funding environmental investigations needed to trigger stalled cleanup and end disinvestment in the MD. Development of new commercial sites (Don Manolo School) will increase the jobs in the target area, reduce unemployment and poverty, and increase household income. Job creation will attract new residents. The construction of an emergency management center will play an important role in the MD and in times of crisis, a necessary haven for those in need of assistance. The Schools and Former Hospital redevelopment plans, when complete, will add 105 housing units to accommodate population growth and meet our low-income housing needs. Increased employment, higher wages, and new development on brownfields will create a sense of pride and ownership of the neighborhood, incentivizing further investment and increasing property values. New tax revenue will be generated and reinvested in the community, multiplying investment in the MD. Funding from an EPA grant will help stimulate investment in brownfields by funding environmental due diligence, improving the economic status and health of residents near brownfields. **Health indicators such as increased cancer, liver disease, and infant mortality (2.a.ii(2)) will no longer be influenced by environmental impacts caused by target area brownfields. This will be accomplished in areas where the disadvantaged, such as low income and minority populations are highly concentrated, supporting environmental justice goals.** To minimize displacement of residents and businesses, reuse plans will include affordable housing for all income levels, competitive-wage job creation, and attract consumers through commercial development. Residents will be involved in the planning through community engagement events, where their input into the design and reuse of brownfields will be sought. Reuse plans have and will always preserve federally subsidized housing programs.

2.b. Community Engagement, i. Prior/Ongoing Community Involvement: The municipality has an ongoing outreach program where our communities, including the underserved or disadvantaged participate in open public meetings where our objectives, plans, and programs are shared. Partnerships with local organizations and efforts through community leaders are among the many feedback mechanisms through which Naranjito has sought input from stakeholders. On October 25, 2023, we celebrated our latest open forum, sending targeted invitations to the El Cerro community residents for the purpose of discussing the revitalization plans the Municipality has for the neighborhood and our ongoing pursuit of the improvement of its infrastructure (including our efforts to obtain the EPA Multipurpose Grant). It is the needs and ideas of the community that have helped shape the plan for revitalization of El Cerro, a process that we intend to replicate on all our upcoming development objectives. The COVID pandemic was a significant obstacle for community outreach efforts during our FY2019 Brownfields Assessment grant. Out of this challenge, we learned how better to utilize alternative community outreach tools, some of which are outlined in section 2.b.iv. Despite these obstacles, we received valuable input and participation from the community that has shaped the upcoming El Cerro redevelopment. We are committed to continuing our successful outreach program in future development.

2.b.ii Project Involvement & iii Project Roles: Several community partners have provided support for our FY2019 EPA Brownfields grant. Many of these partners have pledged a supporting role for our upcoming grant effort as well (Table 2). This assemblage of community groups is best suited to engage the community at a grass roots level. They also have regional influence and local ties, maximizing the benefits they bring to the project. A brownfield committee was assembled from these and other entities, including residents, members of the public, to provide input into the inventory and site prioritization, reuse plans, economic development, and community engagement efforts, among others. The committee

meets 2-4 times/year.

Table 2 – 2.b.ii-2.b.iii – Project Partners and Roles

Name of organization/ entity/group	Point of Contact (name, email & phone)	Specific involvement in the project or assistance provided
COPAN (Coalition of Prevention & Action Naranjito)	Dra. Jannette Rodríguez jrodriguez12973@yahoo.com/ 787-438-9306	Substance abuse prevention/support group who will participate in community engagement events & will help prioritize inventoried sites
Naranjito Public Works Department	Israel Ramos, Dir. of Public Works iramos@municipiodenaranjito.com 787-470-2371	Municipal department in charge of pump station/wastewater project planned on Site 2 – Gas Station #250 who will provide input on cleanup needs of the site and oversee the redevelopment of the property, providing project progress updates at community engagement events
Conferencia San Vicente de Paul (Vicentinos)	Sra. Sylvia Bernart [REDACTED] [REDACTED]	Local, faith-based organization dedicated to assisting the poor & underprivileged. They will participate in community engagement events & help make cleanup and reuse decisions on sites planned for affordable housing reuse.
Pathstone	Sr. Albert Rivera arivera@pathstone.org 787-579-6923	Non-profit & current EPA Job Training Grant recipient who will provide economic development & job creation expertise by training local residents as remediation and renewal energy construction professionals who can work on planned redevelopment projects
Asociacion Comerciantes	Sr. Jose L. Collazo Waxali.inc@gmail.com 787-869-1111	Local trades association who will provide input on cleanup decisions, & offer input/advise on commercial/industrial development
Hope Soldiers	Sr. Tavis Santiago [REDACTED] [REDACTED]	Local non-profit who will participate in community engagement events, assist with development planning/needs analysis for low-income housing, & new site selection & prioritization

2.b.iv. Incorporating Community Input: Naranjito has a well-established culture of community involvement that we will maintain for this grant. Our most recent community engagement event was held on October 25, 2023, one of many that have been held to inform El Cerro residents and other stakeholders of the upcoming program effort and plans for revitalization of the community. **A total of 10-15 public meetings will be held during the 5-year grant** 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, newspapers, radio, and social media (earned media and other low-cost/no-cost, or in-kind methods) ensuring that the entire community has an opportunity to provide input. As alternatives to 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 participants will be updated on advances throughout the grant, as well as have the opportunity to share input through comment opportunities on municipal and 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. Because we have a large non-English speaking population, Naranjito has multi-lingual staff to interpret presentations and translate documents in Spanish and English. We have begun engaging target area residents, business owners, and community advocates to solicit input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the second quarter of the grant period to discuss goals, 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 stakeholder engagement. We will contact regional developers to bring awareness of the reuse opportunities priority sites offer. When developers are identified, they will attend public meetings to share their redevelopment plans. Naranjito staff will catalog stakeholder input for reference when determining assessment and reuse priorities. As the project progresses, we will involve stakeholders in the decision-making process regarding prioritization, assessment, site marketing, cleanup

planning, and reuse. When stakeholder input is received, we will evaluate it against our development goals and available resources, adopting feedback that feasibly meets these criteria.

3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities & Outputs: Naranjito will begin activities immediately upon award confirmation, prepare a Work Plan approved by the EPA PM/PO. No subawards or participant support costs are planned. After the Cooperative Agreement period begins, Naranjito and its QEP will complete the following tasks:

Task/Activity 1: Program Management & Outreach

i. Project Implementation: Naranjito staff will travel to the Puerto Rico Brownfields Week and the National Brownfields Conference, participate in calls, meetings, and correspondence between Naranjito, QEP, EPA, etc. to manage the grant's Cooperative Agreement. 10-15 public meetings to update communities on the brownfield assessment progress and seek public input and involvement; supplies: print and mail material for project/site information and marketing documents will also be funded under this task. Naranjito 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, and cleanup activities and provide marketing resources for future development. We will complete Quarterly, DBE, Annual reports, and ACRES database entries, and will carefully track contractor costs, comparing to the budget, expenditures, project progress, and milestones to ensure the timely expenditure of grant funds within the prescribed 5-year project period. Naranjito, with QEP support, will continue to develop brownfield inventory and will use it as a tool to help accomplish brownfield reuse goals. Inventoried sites will be prioritized based on the following criteria, in no order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice (EJScreen and/or CEJST), and 3) community input. Additional sites will be identified by Naranjito, community leaders, local governments, redevelopment investors, and through community outreach. Priority will be granted to sites within areas identified as disadvantaged 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: Naranjito & QEP

iv. Outputs: Travel-Municipal staff to regional/national brownfields conferences/meetings; prioritized inventory; project performance reports: 20 Quarterly Reports, ACRES entries, 5 MBE/WBE reports, 5 annual financial reports, etc.; calls, meetings, and correspondence between Naranjito, QEP, EPA, etc. to manage the grant's Cooperative Agreement. 10-15 public meetings to update the community on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc. 10-20 brownfield committee meetings to provide input into the inventory and site prioritization, reuse plans, economic development, and community engagement efforts.

Task/Activity 2: Environmental Investigation

i. Project Implementation: Prior to applying for site eligibility, we will prepare and execute an access agreement 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 Naranjito. All Phase I ESAs will be conducted in accordance with the applicable 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 Naranjito, 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 19th 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: Naranjito & QEP

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

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

i. Project Implementation: The QEP, directed by Naranjito, 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: Naranjito & QEP

iv. Outputs: 12 cleanup planning & reuse documents (Remediation Plans, ABCAs, etc.) & 1 design charette.

Task/Activity 4: Site Remediation:

i. Project Implementation: Cleanup will be conducted at up to five key sites (priority sites in 1.a.ii). Costs include contaminated soil and groundwater remediation and disposal, lead-paint and asbestos abatement and disposal and agency reporting, letters, and compliance.

ii. Schedule: Cleanup activities will begin in the 4th quarter of the grant period and continue through the duration of the grant period.

iii. Task/Activity Lead: Naranjito & QEP, ensuring cleanup meets all state and federal requirements.

iv. Outputs: Cleanup Completion and Closure reports for five sites.

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 5-year CA contract. Because there is a high demand for assessments and site access has been obtained for all of the priority sites, as well as ESAs and cleanup cost estimates for two of the sites, 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 and cleanup 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 \$980,275 to Site-specific contractual activities (or 98% of total grant funding assigned to ESAs) with 42% of the budget being allotted to site remediation. The costs outlined in Table 3 were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed (1.a.ii).

Table 3 Budget	Budget Categories ¹	1. Program Mgmt & Outreach	2.Phase I / II ESAs	3. Clean-up / Reuse Planning	4. Site Remediation	Budget Category Total
Direct Costs	Travel	\$5,775	0	0	0	\$5,775
	Supplies	\$450	0	0	\$750	\$1,200
	Admin. Costs	\$5,000	0	\$3,750	\$4,000	\$12,750
	Contractual ²	\$28,900	\$426,250	\$105,000	\$420,125	\$980,275
TOTAL BUDGET		\$40,125	\$426,250	\$108,750	\$424,875	\$1,000,000

¹Table 3 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 & Outreach: \$40,125 – *Travel:* 2 people attend 2 National Brownfield

Conferences: airfare x 4 @ \$2,000, 2 rooms, 6 nights lodging @ \$2,700, meals @ \$900, ground transportation @ \$175 = \$5,775, **Supplies:** printed flyers, advertising, grant fact sheets, outreach visual aids, postage, etc. = \$450, **Administrative:** total \$5,000, includes approximately 100 hrs. \$50/hr = \$5,000, Municipality staff time for administering the grant will be provided as in-kind support, **Contractual:** total \$28,900, includes approximately 180 hrs. \$85/hr. = \$15,300 for program management, & approximately 160 hours \$85/hr. = \$13,600 for outreach activities.

2. Phase I & II ESAs: \$426,250 – **Contractual:** 11 Phase I ESAs at an average cost of \$3,750 each = \$41,250, & 11 Phase II ESAs at an estimated cost of \$25,000-45,000 (depending on site complexity/environmental conditions) = \$385,000 (@ \$35,000 average cost). Though our budget will support 11 Phase I's and 11 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in 1.a.ii.

3. Clean-up & Reuse Planning: \$108,750 – **Administrative:** total \$3,750, includes approximately 75 hrs, \$50/hr = \$3,750, **Contractual:** 6 ABCAs estimated to cost \$5,000 & 6 Remediation Plans estimated to cost \$10,000 each = \$90,000, 1 Design Charette expected to cost \$15,000 each = \$15,000.

4. Site Remediation: \$424,875 – **Supplies:** print remediation specs, bid advertising, postage, etc. = \$750, **Administrative:** total \$4,000, includes approximately 80 hrs, \$50/hr = \$4,000, **Contractual:** total \$420,125, includes: Regulatory Coordination/Project Management estimated \$27,000, Field Oversight estimated \$72,000, Remediation Site Preparation/Protocols \$14,000, Sites 1 & 2 - excavation and transportation of contaminated soil / UST estimate \$113,075, Site 1 lead abatement and disposal estimate \$57,400, Site 3 lead/asbestos abatement and disposal estimate \$129,150, Agency reporting, letters, permits estimate \$7,500.

3.c. Plan to Measure & Evaluate Environmental Progress & Results: We 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 schedule outlined in 3a are not being met, we will create a corrective action plan to identify deficiencies and make the appropriate adjustments necessary to achieve the anticipated outputs on schedule. Further, the Multipurpose Grant will have the following measurable outcomes: sites/acreage assessed, sites/acreage remediated, 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 and success. At the close of the grant, Naranjito will provide a final report to the EPA and our residents summarizing project outputs and outcomes. After evaluation and remediation of sites are done, it is in Naranjito's best interest that redevelopment happens, and as such, 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 page 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: Naranjito's Department of Federal Programs (DFP) will manage this grant. DFP will manage most programmatic management activities and will seek assistance from a qualified consultant for grant management. This office has previously managed many other economic development resources valued at over \$20M in the past 10 years, including the FY19 EPA Brownfields grant referenced in 4.b. The DFP, supported by other municipality staff, has the technical, financial, and administrative ability in place to implement this project successfully. Mr. Pedro Santiago, Director of Federal Programs, will serve as the Project Manager. Mr. Santiago has been with Naranjito for 8 years and has 8 years of grant management experience. He was integral to the success of Naranjito's FY19 EPA Brownfields grant and has extensive experience managing grant activities for the municipality. Mr. Santiago will be assisted by Felix Rivera Matos, Director of Planning, who has extensive experience in planning and reuse design. Both Santiago and Rivera will use their previous brownfield redevelopment and economic development experience to seek redevelopment opportunities for those sites without secured reuse contracts.

Ana Negron, DFP Project Finance Associate, will serve as the Grant Financial Manager and will

be responsible for accounting and financial reporting. She has provided these services on many other grant/loan programs benefiting the municipality, including the FY19 EPA Brownfields grant. Ms. Negron will be assisted by Mariela Rolon, also of the DFP finance department. Staff assigned to this project have all worked for the municipality for at least 8 years. The depth of Naranjito's team will allow for a seamless transition to other experienced members. Municipality staff has a history of working cooperatively with PR and federal environmental agency personnel and engaging qualified environmental consultants. This team will be supported by other municipality departments including finance, utilities, engineering, legal department, and office of the Mayor.

4.a.iv. Acquiring Additional Resources: Through a competitive bidding/procurement process, we will select an environmental consultant in accordance with 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. We will work with the PR Small Business Administration (PRSBA) to identify small businesses in the area with strong labor practices who have been vetted by the PRSBA 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. Contracts for construction activities (remediation services) will be subject to the Davis-Bacon Act. When procuring construction contractors, we will use EPA "Best Practice Guide for Procurement Services, Supplies, and Equipment Under EPA Assistance Agreements" (11/2022) as guidance related to procurement rules and prevailing wage requirements.

Naranjito 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 will ensure timely and successful expenditure of funds within the prescribed 5-year project period. We will pursue funds from multiple federal agencies with the intent to piece together all the necessary funding to successfully redevelop brownfield properties. Some examples of federal funding we will seek include FEMA and CDBG to develop the low-income housing on the Fidel G Padilla School site, CDBG-DR funding to demolish the building, Dept. of Transportation to make road improvements along PR5, and the USEDA to incentivize job creation. As appropriate, we will utilize visioning sessions and other assistance/advice offered by the New Jersey Institute of Technology (Region 2 TAB program) to maximize the incorporation of community input.

4.b. Past Performance & Accomplishments, i. Currently Has Received an EPA Brownfields Grant (1) Accomplishments: Naranjito previously received an FY19 EPA Brownfields Assessment Grant (BF96265000-1 & BF96265000-2) for \$300K. Skillful execution of the Work Plan resulted in the inventory and prioritization of 50 properties and the completion of 7 Phase I ESAs and 6 Phase II ESAs. All outputs and outcomes related to the grants were met and are accurately reflected in the ACRES database, which has continued to be updated after grant closeout. Funding is secured and plans are underway to redevelop one property into senior housing, and funding is in place/designs are underway to reuse a Gas Station #250 to improve the municipality's wastewater infrastructure. To date, \$21M has been secured for the development of these two projects.

4.b.i.(2) Compliance with Grant Requirements: Naranjito's grant opened 10/1/19 and all funds were expended by the end of the grant period on 9/30/22. Naranjito is the first EPA Brownfields grant recipient in PR to ever complete all grant funded activities within the scheduled 3-yr grant period. All Work Plan approved activities were completed on time, and all Cooperative Agreement terms and condition/deliverables (ACRES reporting, Quarterly Reports, annual financial reports, MBE/WBE reports, etc.) were met and completed on time.

III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility

The Municipality of Naranjito 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 Multipurpose 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. 10 to 15 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 Target Area

Target Area: The Mountain District (MD) – At 1.6 square miles, the MD (Portions of Census Tracts 72105520100, 72105520200, 72105520300, and 72105520400) consists of the urban center of Naranjito and surrounding mountainous areas. The MD also includes portions of PR5, our primary link to San Juan, the largest commercial and industrial center in PR. See section IV.E.1.a.i of the Narrative/Ranking Criteria for further information.

III.B.4 Affirmation of Brownfield Site Ownership

The Municipality of Naranjito owns three sites (Site 1, Site 4, and Site 5 as mentioned in Section IV.E.1.a.ii of the Narrative/Ranking Criteria) that meet the CERCLA§ 101(39) definition of an eligible brownfield. None of the proposed sites are listed on the National Priorities List, are subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; or are subject to the jurisdiction, custody, or control of the U.S. government.

III.B.5 Use of Grant Funds

The Municipality of Naranjito intends to conduct at least 10-12 Phase II Environmental Site Assessments and 3-5 site remediations. We will also further develop our existing overall plan for revitalization of the target area, with feasible reuse strategies for our priority sites. See Section IV.E.1.b.i of the Narrative/Ranking Criteria for additional information.

III.B.6 Expenditure of Existing Grant Funds

This criterion is not applicable as the Municipality of Naranjito is not a current/does not currently have an EPA Brownfields Grant

III.B.7 Contractors and Named Subrecipients

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