



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF WATER

July 26, 2022

MEMORANDUM

SUBJECT: National Estuary Program Bipartisan Infrastructure Law Funding Implementation
Memorandum for Fiscal Years 2022-2026

FROM: Radhika Fox
Assistant Administrator

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TO: EPA Regional Water Division Directors
National Estuary Program Directors

1. Introduction

On November 15, 2021, President Biden signed the Bipartisan Infrastructure Law (P.L. 117-58), also known as the “Infrastructure Investment and Jobs Act of 2021” (IIJA) or “BIL.” The law’s investment in water is nothing short of transformational. It includes \$50 billion to the U.S. Environmental Protection Agency (EPA) for water infrastructure, the single largest investment in water that the federal government has ever made. The BIL provides \$132 million in funding for the 28 longstanding National Estuary Programs (NEPs) for fiscal years 2022 through 2026. This funding will be evenly distributed to the NEPs, annually providing each with approximately \$900,000 in BIL funds. EPA is committed to continuing the effective partnership with the NEPs to address critical water needs of communities and ecosystems in estuaries of national significance.

Since 1987 this place-based program, located in 28 estuaries of national significance along the Atlantic, Gulf, and Pacific coasts, and in Puerto Rico, has developed and implemented long-term Comprehensive Conservation and Management Plans (CCMPs), funding projects that restore the water quality and ecological integrity of their regions. These CCMPs provide a structured framework for the delivery of investments. NEPs involve community members in the decision-making process and the challenges and priorities they address are defined by local, city, state, federal, private, and non-profit stakeholders in coordination with their management conferences. The NEPs’ collaborative, locally driven approach has over time generated an average of approximately \$22 return on each federal dollar invested, delivering nearly \$6 billion for habitat protection and restoration and water quality enhancement projects.

This NEP BIL Funding Implementation Memorandum (memorandum) applies to funding provided under the BIL and provides guidance on uses of funds, timeframes, how to award the funds, and tracking and reporting requirements. This memorandum describes the process for FY 2022 – FY 2026 BIL funds and may be supplemented by additional implementation memoranda as needed. Unless otherwise noted in this document, the FY 2021 – FY 2024 Clean Water Act §320 National Estuary Program Funding Guidance also applies to BIL funding.

2. NEP BIL Priorities

A core emphasis of the NEP BIL funding is the acceleration of environmental and community restoration goals within the CCMPs. The substantial increase in NEP funding appropriated in the BIL is expected to significantly enhance NEP capacities to do this work, as well as enable the NEPs to develop and strengthen partnerships necessary to make the most effective use of these new funds.

Environmental justice (EJ) and addressing climate change are key EPA priorities reflected in the Agency's [FY 2022–2026 EPA Strategic Plan](#), which provides the framework for EPA to integrate EJ considerations into its programs, plans, and actions, and to ensure equitable and fair access to the benefits from environmental programs for all individuals. The Strategic Plan's first two goals are to:

- “Tackle the Climate Crisis” by reducing emissions that cause climate change and accelerating resilience and adaptation to climate change impacts; and
- “Take Decisive Action to Advance Environmental Justice and Civil Rights” by promoting EJ and protecting civil rights at the federal, state, and local levels.

EPA is embedding these goals in its programs, policies, and activities, including the implementation of the NEP BIL funds. NEP projects funded through BIL should seek to:

- **Accelerate and more extensively implement CCMPs:** The significant and multi-year expansion of funds through the BIL provides an opportunity for NEPs to execute long-term projects within the communities they serve, leverage additional resources, and work with their management conferences and other key stakeholders to advance a wide range of projects identified in CCMPs.
- **Ensure that benefits reach disadvantaged¹ communities:** The BIL is a transformational opportunity to ensure that the benefits of federal investments are shared equitably by communities benefiting from estuary program projects. In identifying priority actions, management conferences should prioritize projects with benefits that flow to historically disadvantaged communities. Specifically, the NEP BIL funds are covered under the Justice40 Initiative, and the national program, as a whole, has a target of ensuring that at least 40% of the benefits from the BIL flow to disadvantaged communities. Each estuary program will be required to develop an equity strategy (see section 4 of this memorandum) that will outline the approach it will take to contribute to the nationwide NEP Justice40 target.
- **Build the adaptive capacity of ecosystems and communities:** NEPs have long been at the forefront of efforts to address climate change impacts in their watersheds, working with federal, state, and local partners, often using green infrastructure and nature-based solutions. NEPs should use BIL resources to continue to expand on their climate change adaptation, hazard mitigation, and resilience activities, where appropriate, including protection and restoration of key habitats that increase resiliency and carbon sequestration. In identifying priority actions, NEPs should select projects that advance the climate resilience of ecosystems and communities and deliver climate emissions mitigation co-benefits. Moving forward, NEPs' reporting on BIL

¹ Executive Order [14008](#) uses the phrase “disadvantaged communities,” and this term has been used in existing Federal and state programs to prioritize funding for environmental justice. Some community members and advocates prefer alternative terminology, and specifically the use of “overburdened and underserved communities.” Until subsequent guidance can address the question of the most appropriate terminology, this memorandum relies on the language used in Executive Order 14008.

funding will include metrics addressing climate benefits. Where possible and aligned with the priorities identified in their CCMPs, NEPs should engage and educate the public and private sectors on key climate-related vulnerabilities and solutions and provide technical and financial assistance to accelerate progress in response to a changing climate. NEPs should elevate climate efforts through BIL implementation including, but not limited to:

- Assessment and planning projects that involve climate change vulnerability assessments, community resilience and adaptation plans, or hazard mitigation plans;
 - Restoration, water infrastructure, green infrastructure, stormwater management, and nonpoint source projects that prioritize innovative climate adaptation, hazard mitigation, and resilience solutions;
 - Projects focused on climate-related research, including those that measure, monitor, and increase carbon sequestration;
 - Projects focused on climate-related outreach and education.
- **Leverage additional resources:** The NEPs have a history of significantly leveraging and supporting program implementation with additional federal and non-federal resources. As NEPs select BIL projects, EPA expects programs to collaborate with other federal agencies and new partners and identify opportunities to leverage other EPA and federal agencies' funds (including other BIL funds), as well as state, local, and nongovernmental organization funds as available and appropriate.²

3. NEP BIL Authority and Eligible Uses

The BIL references EPA's underlying authority under CWA §320 to fund the implementation of the NEP CCMPs. **As with annual appropriations distributed to NEPs to implement CWA §320, the funds distributed under the BIL must implement the management conference and EPA-approved CCMP and workplan.**

As described in CWA §320, NEPs should have a CCMP that:

- (A) recommends priority corrective actions and compliance schedules addressing point and nonpoint sources of pollution to restore and maintain the chemical, physical, and biological integrity of the estuary, including restoration and maintenance of water quality, a balanced indigenous population of shellfish, fish and wildlife, and recreational activities in the estuary, and assure that the designated uses of the estuary are protected;*
- (B) addresses the effects of recurring extreme weather events on the estuary, including the identification and assessment of vulnerabilities in the estuary and the development and implementation of adaptation strategies; and*

² NEPs are particularly encouraged to explore significant new funding streams in the BIL including an additional \$11.7 billion for EPA's Clean Water State Revolving Funds (CWSRFs), over \$2 billion in new and existing water programs at the Department of Interior, and over \$30 billion in resiliency funding across multiple federal agencies. Details on these programs can be found at [Build.gov](https://www.build.gov). Although BIL funds cannot serve as non-federal cost-share, NEP BIL funds can be combined with other funding sources, and during distinct phases of projects already identified in workplans that implement approved CCMPs. For example, NEP BIL funds can augment NOAA funds for fish habitat improvements by providing planning, design, and permitting assistance, monitoring post-project implementation, or other project enhancements. NEP BIL funds can support stormwater projects that advance the use of nature-based solutions and that could apply for funding through the CWSRFs and other federal funding sources to expand restoration efforts. In the above examples, "distinct phases" could include policy recommendations, planning and/or design, implementation, and monitoring. Projects that are funded with BIL and non-BIL funds (including external sources) must track the use BIL funds separately for reporting.

(C) increases public education and awareness of the ecological health and water quality conditions of the estuary.

Since each NEP characterizes and reflects the priority needs in its own estuary and surrounding watershed in its CCMP, eligible actions and activities will vary across programs. BIL funds can support CCMP implementation activities that include, but are not limited to:

- Protecting and restoring critical habitats, including wetlands and addressing challenging issues that threaten the ecological and economic well-being of NEP watersheds and communities;
- Supporting water quality protection and restoration, including Total Maximum Daily Load plan implementation;
- Monitoring and addressing toxics and pathogen loads and contamination;
- Implementing stormwater management practices that reduce non-point source pollution impacts;
- Promoting the adoption of green and nature-based infrastructure approaches;
- Preventing the spread of aquatic invasive species and/or managing their impacts;
- Developing and implementing nutrient reduction strategies;
- Measuring, monitoring, and increasing carbon sequestration;
- Conducting climate vulnerability assessments, developing and implementing climate change adaptation strategies and using adaptation tools to promote coastal resilience; and
- Developing and implementing strategies to increase opportunities for disadvantaged communities to access, enjoy, and benefit from surface waters and waterways, participate in ecosystem restoration, and engage in capacity-building or educational activities.

NEPs may also use funds to support other activities identified in their CCMP, including projects that build organizational or financial capacity. NEP Regional Coordinators can answer specific questions on eligible uses.

4. Annual BIL Workplan and Long-Term Plan

Due to the long-term nature of BIL funding, each NEP will be required to develop a BIL Long-Term Plan to submit no later than June 1, 2023, and submit an Annual BIL Workplan by June 1 of each year starting in 2023. EPA expects FY 2023 – FY 2026 funds to be available early in each fiscal year, so earlier workplan submissions are encouraged.

Annual BIL Workplans: A detailed, management conference-approved annual BIL workplan must be submitted by June 1 of each year, with the exception of FY 2022. For FY 2022, workplans should be submitted within 90 days after the issuance of this memorandum. Regions and NEPs may want to consider a single incremental agreement combining at least FY 2022 and FY 2023 BIL funds to reduce the grant management workload and to capture efficiencies regarding the non-federal match waiver for these funding years. NEPs must provide a complete SF 424 application, including required forms and certifications, a management conference-approved Workplan, and beginning in June 2023, an updated BIL Long-Term Plan through Grants.gov. Annual BIL Workplans can be submitted in the same format as annual appropriations workplans per the NEP funding guidance and must contain the following workplan elements:

- CCMP Goals and BIL-supported tasks or activities related to each;
- Discussion of how projects reflect BIL priorities and implement their CCMP, particularly with respect to how the proposed work may benefit disadvantaged communities, provide climate

- adaptation or mitigation co-benefits, and support CCMP goals;
- Budget and personnel per SF 424 categories;
- New and ongoing project information, including the following for each project:
 - Project or activity name: indicate whether it is a “New” project or distinct phase of an “Ongoing” project;
 - Objective(s): describe in one or more sentences;
 - Description, describe the project briefly in one or more sentences (including location if known);
 - Leads, partners and their role(s) (if available) – making note of coordination with Urban Waters Federal Partnership (UWFP) locations (where applicable), particularly on reaching disadvantaged communities;
 - Anticipated output(s) or deliverable(s);
 - Estimated milestones, where appropriate;
 - Anticipated long-term outcome(s); (including benefits to disadvantaged communities); and
 - Estimated project budget.

BIL Long-Term Plan: NEPs must develop a long-term plan that describes the key activities each NEP will pursue with BIL funds through all years of BIL funding (FY 2022 – FY 2026). The BIL long-term plan may have less detail than the annual workplans, and may be amended, modified, or revised at any time. Changes may be submitted each year along with the annual BIL workplan. The initial BIL long-term plan will be due no later than June 1, 2023.

The certainty of BIL funding for 5 years allows NEPs to develop a plan that organizes and communicates each program’s long-term expectations for using BIL funds. Importantly, **NEP BIL funds are available until expended**. As “no-year” funds, NEPs have the opportunity to leverage BIL funds to undertake initiatives that have long lead times or require multiple years of support, such as long-term environmental management projects or organizational capacity-building.

EPA encourages efficient spending of these funds. To ensure consistency with timelines for other complex construction or restoration projects, and with existing grants policy, EPA recommends a project/budget period of multiple years for each award, with the option for no-cost extensions. Since BIL projects are not expected to be completed within a year of funding, the requested long-term plan should include:

- Proposed types of projects and/or short project descriptions;
- Estimated timelines for projects for program activities;
- Potential additional sources of funding;
- Program capacity building needs to deliver BIL supported activities;
- Opportunities for potential coordination with other key stakeholder groups, including current or future Urban Waters Federal Partnership locations, where applicable; and
- Equity strategy.

Equity Strategy: Each NEP’s long-term plan must include a strategy detailing how the NEP will contribute to the national program-wide goal of ensuring that at least 40% of the benefits and investments from BIL funding flow to disadvantaged communities. This equity strategy should be submitted as part of each NEP’s BIL long-term plan no later than June 1, 2023. The strategy will be reviewed prior to awarding FY 2024 – FY 2026 BIL funds and approved by EPA’s Assistant Administrator for Water.

The purpose of the equity strategy is to ensure that each NEP is reviewing potential projects and utilization of BIL funds through the lens of equitable and fair access to the benefits from environmental programs for all individuals. The equity strategy should outline how BIL funds will be utilized to increase investments in disadvantaged communities and the benefits that flow to them. The strategy should include:

- **Definition of disadvantaged communities.** For most NEPs, this will be the definition EPA described in the following section of this memorandum, “Defining Disadvantaged Communities.” If an NEP needs to use a different definition of disadvantaged communities, (e.g., a partner state agency already has an established definition, or the definition and screening tool do not reflect any disadvantaged communities in the study area), NEPs should work with EPA to develop an approved alternative prior to finalizing the equity strategy.
- **Baseline.** The baseline is a number that reflects the recent (pre-BIL) percentage of NEP funds flowing to projects that benefit disadvantaged communities.
- **Analysis of disadvantaged communities** that may benefit from NEP projects to identify where additional investments can be made that benefit such communities while implementing CCMPs.
- **Numeric target** for activities supporting disadvantaged communities that contribute to achieving a target at or above 40% of benefits to such communities for the national program over the lifespan of total NEP BIL funds;
- **Key activities.** An outline of the path to achieve the new goal may include projects, locations of activity, milestones, training and outreach needs, capacity building, and interim goals.³
- **Tracking benefits.** Further guidance will be provided in consultation with EPA’s Office of Environmental Justice (OEJ) for tracking benefits to disadvantaged communities. This may include:
 - Expanded adaptive capacity of disadvantaged communities to be resilient to climate change;
 - Improved wildlife habitat, addressed water quality challenges or prevented or reduced nonpoint source pollution affecting disadvantaged communities;
 - Increased disadvantaged communities’ access to recreation; and
 - Expanded education and/or deepened engagement or representation of disadvantaged communities (for example expanding management or other committees to include greater representation from disadvantaged communities).

Defining Disadvantaged Communities

NEPs should use a combination of the demographic indicators below to determine where disadvantaged communities that benefit from their programs may be located. The pending update to EPA’s [EJScreen](#) tool will include a new five-factor Supplemental Demographic Index that combines these factors:

- Percent low-income;
- Percent linguistically isolated;
- Percent less than high school education;
- Percent unemployed; and
- Low life expectancy.

³ The Urban Waters Federal Partnership (UWFP) focuses on water quality, habitat, and access to green-space in nature-deprived communities. NEPs that are co-located with current or future UWFP locations are encouraged to collaborate as much as possible with those partnerships on project ideas, leveraging opportunities and other on-the-ground support to address the needs of disadvantaged communities and environmental justice issues.

These demographic indicators can be used to highlight areas where vulnerable populations may be disproportionately impacted. Maps generated in EJScreen highlight census block groups above the 80th, 90th, and 95th percentiles when compared to the nation, calculated as the average of these demographic indicators. If the Supplemental Demographic Index percentile in a census block group exceeds 80%, it will be identified as a disadvantaged community for the purposes of establishing baselines in each NEP's equity strategy, and for tracking Justice40 investments and benefits.

NEPs have already articulated local environmental priorities within their CCMPs, and the connection between CCMP priorities and these demographically defined disadvantaged communities demonstrates the intersection of NEP environmental and demographic priorities. NEP projects can also benefit disadvantaged communities outside of NEP study areas, and those project investments and benefits should be included toward the Justice40 target when there is information to indicate this connection.

Consistent with OMB's [Interim Implementation Guidance for the Justice40 Initiative](#), this BIL funding memorandum offers flexibility to NEPs in selecting projects consistent with the intent to deliver benefits to disadvantaged communities. NEPs may consider appropriate data, indices, and screening tools to determine the best uses of BIL funding to support their CCMPs and their communities in need. If an NEP needs to use a different definition of disadvantaged communities (e.g., a partner state agency already has an established definition or the screening tools listed above do not reflect any disadvantaged communities in the NEP study area), to target their work, EPA will support NEPs in developing an approved alternative. However, for consistency, all NEPs should calculate a baseline using the methodology outlined above.

EPA will provide workshops and other technical assistance to support NEPs in mapping the disadvantaged communities that benefit from their projects. Additional EPA assistance will be available to NEPs to produce these maps and calculate their baseline for the purposes of the equity strategies.

5. Awarding BIL Funds

EPA Regions should consider using an incremental cooperative or grant agreement as the funding mechanism for funding appropriated in the BIL. An incremental agreement may include up to the full BIL amount anticipated over the next five years (FY 2022 – FY 2026), with funds disbursed annually as available. Regions and NEPs may especially want to consider a single incremental agreement combining FY 2022 and FY 2023 BIL funds to reduce the grant management workload and to capture efficiencies regarding the non-federal match waiver for these funding years.

Incremental awards will enable applicants to develop longer-term workplans and budgets which are then funded partially over time until the maximum amount of the award is distributed. This format will help EPA and recipients to align large projects to specific funding and to prepare for future funding needs, while providing flexibility to plan, organize, and support suitable projects as opportunities arise.

Although a multi-year incremental award is recommended, Regions have the flexibility to use the funding mechanism of their choice (annual, incremental, supplemental, etc.). If Regions choose alternatives to the incremental award, the same requirements for managing, tracking, and reporting apply.

In accordance with Policy Notice Number PN-2022-G03 regarding "Split Funding", EPA has determined, based on anticipated OMB direction for accounting, tracking, reporting on, documenting and conditioning BIL funds as well as the need to facilitate effective transaction testing for expenditures

of BIL grant funds, that EPA will not combine BIL appropriations and “regular” annual appropriations in the same grants. However, EPA may provide a waiver from this policy for an NEP because the BIL funds were appropriated for the same purpose as the “regular” annual appropriation in that account. NEPs may work with their regional coordinator to discuss this option on a case-by-case basis. Please note that administrative convenience is not a compelling reason for split funding with BIL appropriations.

Other Award Considerations

Assistance agreements will need to consider the following flexibilities, requirements, and priorities in implementation, including as appropriate in Terms and Conditions:

- **Flexibility to waive cost-share requirement:**⁴ This memorandum serves as approval to waive the NEP non-federal match/cost-share requirements, for all NEPs, for BIL funds in FY 2022 – FY 2023. For FY 2024 – FY 2026 BIL funds, after approval of each estuary program’s equity strategy, EPA will waive non-federal cost-share requirement. Cost-share waivers must be approved by the Assistant Administrator of the Office of Water, or by relevant Regional Administrator. Regions should consult with Headquarters prior to approving a cost-share waiver to ensure national consistency.
- **Fully enforce civil rights.** EPA’s nondiscrimination regulations prohibit recipients of EPA financial assistance from taking actions in their programs or activities that are intentionally discriminatory and/or have a discriminatory effect based on race, color, national origin (including limited English proficiency), age, disability, or sex. NEP funding under the BIL should ensure compliance with civil rights laws. EPA will provide interested NEPs with technical assistance and training to support their compliance with Title VI obligations.
- **Compliance with Build America Buy America Act Requirements.** Congress passed the Build America Buy America (BABA) Act in 2021, concurrently with the BIL. Congress established this domestic preference program to create long-term opportunities for domestic manufacturers and manufacturing jobs, and to build resilient domestic supply chains for a wide range of products used in construction and infrastructure, including iron and steel products, manufactured products, and construction materials. EPA will work with the NEPs to determine the types of products that may be covered by this new law and will support compliance where necessary. Additional guidance and information regarding program-wide, project-specific, and product-specific waivers, and the process to apply for them, will be forthcoming. Compliance instructions will also be addressed in the terms and conditions of each award, and these requirements extend to sub-awardees.
- **Compliance with the Federal Flood Risk Management Standard for built infrastructure.** Where appropriate, projects should incorporate the *Federal Flood Risk Management Standard* (FFRMS) defined in Executive Order 13690 to improve the resilience of communities, ensuring that federal investments located in or near floodplains are designed to be resilient to the impacts of flooding. The FFRMS requires that new construction, or significant improvements, of structural infrastructure funded using federal financial assistance be elevated to withstand local flood risk conditions. More information can be found at: <https://www.fema.gov/floodplain-management/intergovernmental/federal-flood-risk-management-standard>.
- **Support the American Worker and Renew the Conservation and Water Workforce.** The BIL is not only an opportunity to reinvest in America’s communities and ecosystems, but also an opportunity to invest in the American workers who support them. BIL investments through NEPs

⁴ Note: BIL funds cannot be used as non-federal match for other federal funding sources. Cost-share for annual (non-BIL) NEP funds cannot be waived.

should contribute to developing a strong restoration and conservation workforce, build capacity to maintain critical gray or green infrastructure, and support efforts to open pathways to environmental employment, especially for youth and groups currently under-represented in fields such as construction and trades, environmental restoration, science, and conservation. Note: funds from the NEP may not be used to support or oppose union organizing, whether directly or as an offset for other funds.

6. Reporting

Regularly scheduled NEP Program Evaluations will include documentation and results of BIL projects as they proceed. Evaluations should consider tracking and reporting information collected over the life of the projects. As a part of CCMP implementation, the BIL-funded activities should be included in the program evaluation packages as appropriate.

Annual Reporting: NEPs are required to provide reports to the EPA Regions consistent with the Terms and Conditions stated in their assistance agreements. The purpose of these reports is to provide a clear record of how BIL funds were spent during the reporting period. This may align with the current regional schedule of reporting for CWA §320 annual appropriations. EPA intends to design a way to identify BIL projects within the existing NEP Online Reporting Tool (NEPORT) database where relevant, and to build a separate mechanism for reporting and tracking other required metrics for BIL funding.

The NEPs shall report on the following for all projects using BIL funding:

- Project/activity name and location (lat/long);
- Brief project description;
- Lead implementer, partners and their roles;
- Deliverables and completed activities;
- BIL funds spent on project implementation;
- Definition of disadvantaged communities used in the NEP;
- How BIL workplan tasks support BIL priorities and implement CCMP priorities;
- If applicable, any external constraints related to any/all workplan elements and how the NEP addressed those constraints; and
- Important key environmental and programmatic accomplishments, completed workplan activities, and noteworthy lessons learned, presented in enough detail to fully describe what was accomplished, along with whatever substantiating data are available.

EPA will provide NEPs with reporting schedules in their grant award Terms and Conditions. Regional Coordinators are asked to share the final Annual/End of Year Report for each NEP with their respective HQ Coordinator by the date consistent with the FY 2020 – FY 2024 Clean Water Act §320 National Estuary Program Funding Guidance.

Close-Out Reports: After the final expenditure of BIL funds, NEPs shall provide a final narrative that includes:

- Total BIL awards received;
- All actions taken with BIL funding, specifically highlighting actions aimed at advancing equity and climate priorities;

- Outcomes (including anticipated outcomes) of such activities for achieving specific CCMP goals;
- Discussion of how activities funded with BIL funds improved (or are expected to improve) disadvantaged communities' access to infrastructure funding, ability to influence decision making, and participation in CCMP implementation projects impacting public health and the environment; and
- Discussion of how activities improved (or are expected to improve) the ability to adapt to and mitigate climate change impacts through implementation of CCMPs.

7. Tracking

NEPs and Regions must ensure that all BIL funds are clearly tracked to the underlying appropriation in the law and must be prepared to report on the purpose of all obligations. EPA Regions should use the technical guidance from the Office of Budget that establishes codes to track all BIL funding. EPA anticipates that there will be OMB requirements for tracking, reporting on, documenting, and conditioning BIL funds that will be unique.

It will be necessary for auditors or other oversight personnel to perform transaction testing on expenditures of BIL funds. BIL funds must be awarded and managed in compliance with the "Purpose" statute, 31 U.S.C. 1301 as well as meet Congressional and OMB expectations for accounting, tracking, documenting, and reporting. At a minimum, NEPs must track BIL funds separately from other funds received. Additional tracking requirements will be included in the Terms and Conditions of their award.

8. Contact Information

For questions regarding implementation of this memorandum, please contact:

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