

**City of Fayetteville Staff Review Form**

**2022-1053**

**Legistar File ID**

**12/6/2022**

City Council Meeting Date - Agenda Item Only  
N/A for Non-Agenda Item

Britin Bostick

11/18/2022

LONG RANGE PLANNING (634)

**Submitted By**

**Submitted Date**

**Division / Department**

**Action Recommendation:**

Application for a Certified Local Government Grant from the Arkansas Historic Preservation Program for the 2023 grant year in the amount of \$20,370 with a proposed \$5,000 cash match. The request is for a grant application requesting \$20,000 for a Historic Context Statement for the University Heights/Haskell Heights neighborhood, \$370 for Historic District Commission training, and a budget amendment for a grant match of \$5,000.

**Budget Impact:**

1010.090.6600-5314.00	General Fund
Account Number	Fund
32207.2023	AR Historic Preservation Program (CLG Grant) - Historic Context Stmt - University & Haskell Heights
Project Number	Project Title
<b>Budgeted Item?</b> <u>No</u>	Current Budget            \$            -
	Funds Obligated            \$            -
	Current Balance            \$            -
<b>Does item have a cost?</b> <u>No</u>	Item Cost                    \$            -
<b>Budget Adjustment Attached?</b> <u>Yes</u>	Budget Adjustment            \$            5,000.00
	Remaining Budget            \$            5,000.00

V20210527

**Purchase Order Number:** \_\_\_\_\_

**Previous Ordinance or Resolution #** 319-20; 129-21

**Change Order Number:** \_\_\_\_\_

**Approval Date:** 12/15/20; 05/04/21

**Original Contract Number:** \_\_\_\_\_

**Comments:**



**MEETING OF DECEMBER 6, 2022**

**TO:** Mayor and City Council

**THRU:** Susan Norton, Chief of Staff  
Jonathan Curth, Development Services Director

**FROM:** Britin Bostick, Long Range Planning/Special Projects Manager

**DATE:** November 18, 2022

**SUBJECT:** **Application for a Certified Local Government Grant from the Arkansas Historic Preservation Program for the 2023 grant year in the amount of \$20,370 with a proposed \$5,000 cash match:** Submitted by CITY OF FAYETTEVILLE STAFF. The request is for a grant application requesting \$20,000 for a Historic Context Statement for the University Heights/Haskell Heights neighborhood, \$370 for Historic District Commission training, and a budget amendment for a grant match of \$5,000.

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**RECOMMENDATION:**

City staff recommends approval of a grant application for a Certified Local Government (CLG) Grant from the Arkansas Historic Preservation Program (AHPP) for the 2023 grant year in the amount of \$20,370 with a proposed \$5,000 cash match for a total project budget of \$25,000 for a historic context statement and \$370 for Historic District Commission training.

**BACKGROUND:**

In 2020 the Fayetteville City Council approved a request from staff to apply for an AHPP CLG grant to include a historic context statement of the University Heights/Haskell Heights neighborhood and a citywide Historic Preservation Master Plan. The approval included a budget amendment for a \$20,000 grant match. Although the grant application was approved, COVID-related staffing issues at both the AHPP and the City, and the strict grant timeline proved infeasible. In October of 2021 the grant was canceled at staff's request, and staff developed an updated request and grant application for the 2022 CLG grant cycle. The citywide Heritage & Historic Preservation Master Plan is underway with support from a \$50,000 CLG grant, but the historic context statement portion was not funded in that cycle. After discussing the historic context statement with AHPP staff and refining the grant application to focus on the University Heights/Haskell Heights neighborhood context statement project, staff is bringing the request for grant funding back to the Council to submit for the 2023 grant cycle, and requesting approval of a \$5,000 cash match as one-fifth of the project budget. The Historic District Commissioners considered this project and grant proposal in their regular meeting on October 13, 2022 and concurred with staff's recommendation to submit the project for the grant application. Additionally, this year an in-person training will be available to the Historic District Commissioners and Long Range Planning staff in Fort Smith, Arkansas, with training details

including training date forthcoming. Training funds are encouraged by AHPP to be submitted with this grant application as the training funds are eligible for grant funding.

## **DISCUSSION:**

The proposed projects for this grant application are the University Heights/Haskell Heights Historic Context Statement (1) and CAMP training for the City of Fayetteville's Historic District Commissioners and supporting staff (2). The documents attached are required for the grant application submittal.

### **1. University Heights/Haskell Heights Historic Context Statement**

The proposed project is a historic context statement for the University Heights and Haskell Heights neighborhoods. The University Heights and Haskell Heights neighborhoods are located directly to the west of the University of Arkansas main campus in Fayetteville. The approximate borders of the neighborhoods are Cleveland/Wedington Drive to the north, Razorback Road and Garland Avenue to the east, Nettleship Street to the south, and Sang Avenue to the west (see attached map). AHPP conducted a site visit in 2017 and followed with a letter recommending an architectural survey and noting the potential importance of early farmhouses and houses with connections to faculty from the University of Arkansas. The neighborhoods comprised a total of 414 parcels and 389 structures in 2021, with at least 253 or 65% of the structures being greater than 50 years old, according to public records.

This project has had strong advocates for the past several years, including a Fayetteville City Council Member, who continues to advocate for the project, with the concurrence of the Historic District Commission. Due to development pressure, low housing supply and high demand, and a rapid increase in enrollment at the University of Arkansas, this neighborhood is at risk for redevelopment. Approximately 3,000 additional students were admitted to the University of Arkansas in 2022, and student housing complexes on available parcels near the main campus are regularly being submitted for development review. Additionally, homes in the University Heights neighborhood are increasingly becoming investment properties used for short-term rentals as University of Arkansas athletics and events have become a year-round draw. Large residential structures are being constructed between Razorback Road and Markham Hill, putting historic structures – particularly those on large lots – at high risk for redevelopment and removal of the remaining historic structures, particularly those owned as investment properties. Compounding that pressure is the lack of zoning protections for the historic structures in the neighborhood. The importance of this project is the research and documentation of the history of these neighborhoods to begin the process of survey work, to support National Register nominations (one of which, the Anderson House, was recently submitted for consideration), and to provide for neighborhood engagement on the process and requirements for the establishment of a local ordinance district with zoning protections. Without the research and writing to establish the historic context, property owners will need to complete their own context work and research and city staff and commissioners will not have a basis for future considerations for these historic neighborhoods. Additionally, the context statement will produce knowledge about

development patterns, history, and recognition of the potential historic significance of structures or groupings in the area. The context would provide background support for a future architectural resources survey and help prioritize survey work. As defining neighborhood boundaries can be challenging, one of the anticipated outcomes of this project is a clear neighborhood boundary to assist with any future surveys or policy proposals.

This context survey would require a project consultant to complete the work, both to provide needed capacity to perform the work and to meet the Secretary of the Interior's qualifications for this type of project work. Staff has solicited cost estimates from qualified and experienced professionals and has received a cost range of \$17,750-\$27,500 for the context statement. The range in prices is due to the location of prospective consultants relative to Fayetteville and associated travel costs, time and resources needed for research, and the anticipated written deliverables. As Fayetteville staff requested pricing for this project in 2021 prior to submitting the project as part of the grant request for 2022, project budget numbers are available for the last two years, consistently showing about a 10% increase in the high end of consultant's estimates from last year, but relatively stable overall. Last year's project estimates for the University Heights context survey ranged from \$18,000-\$25,000. This year the low range has remained stable with the high range increasing by 10%. Project budget estimates were gathered by communicating the information in this application document to project consultants who are active in the historic preservation field and experienced in this type of work, as well as who meet the SOI qualifications for the project work.

Should this project receive a grant award, the outcomes and work products will provide the Fayetteville Historic District Commission with a more clear understanding of the process to select and administer a neighborhood research and documentation project, an avenue for connecting with historic neighborhoods to understand their status and history, an advocacy tool for additional steps in the preservation process, and an important next step in both following through with a longtime request and in maintaining momentum as the Citywide Heritage & Historic Preservation Master Plan process comes to a close. As there continues to be strong hesitation in Fayetteville about the benefits of local historic zoning protections, even in the face of development pressures, the Fayetteville Historic District Commission has expressed a desire to build trust by demonstrating that not only is valuable historic preservation work available without rigorous property controls, but that it can and should be preceded by a thoughtful process to research, document, and evaluate the historic resources that are in need of protection and stewardship.

## **2. CAMP training for the City of Fayetteville's Historic District Commissioners and supporting staff**

The City of Fayetteville has seven appointed Historic District Commission Commissioners, most of whom have not yet attended a CAMP training. Additionally, one of Fayetteville's two staff supporting the Historic District Commission have not yet attended a CAMP training. Although the City of Fayetteville currently has only one structure protected by historic

zoning, the community is considering whether to adopt additional zoning protections for neighborhoods as we work through our Citywide Heritage & Historic Preservation Master Plan, which is primarily funded by a CLG grant. Should additional historic zoning be an option, the Fayetteville HDC Commissioners will need to be trained on best practices for review of Certificates of Appropriateness, one of the aspects of the CAMP training. Additionally, most of the HDC Commissioners are new, and have expressed enthusiastic interest in an opportunity for additional training, particularly with their peers across the state. All seven of the commissioners and both staff would like to attend the training, which would be a total registration fee cost of  $9 \times \$25 = \$225$ . Travel costs would only be for travel to and from Fort Smith in the same day as it is a close distance from Fayetteville, and with the number of commissioners and staff proposed to travel and the current federal mileage rate, the cost for travel would be approximately  $2 \text{ vehicles} \times 116 \text{ miles round trip} \times \$0.625 \text{ per mile} = \$145$ . This would be a total of \$370, the amount requested.

**BUDGET/STAFF IMPACT:**

\$5,000 from general fund

**Attachments:**

- Project Budget
- OMB Circular A-133 Audit Certification Form
- U.S. Department of the Interior Certification form regarding Debarment, Suspension and Other Responsibility Matters, Drug-Free Workplace Requirements and Lobbying

### CLG-23 Grant Application Supporting Line Item Budget

Project/Item	Item	Cost	Description	Source
University Heights/Haskell Heights Historic Context Statement	Consulting Fees	\$25,000	Consulting fees to develop a historic context statement for the University Heights/Haskell Heights neighborhood, which is approximately 414 land parcels and 389 structures.	Qualified Project Consultant Estimates*
	<b>Total</b>	<b>\$25,000</b>		
CAMP Training Spring 2023	Attendee Registration	\$225	7 Historic District Commissioners and 2 Staff Members at a registration cost of \$25 each	AHPP Staff for registration fees
	Attendee Travel	\$145	116 mile round trip from Fayetteville to Ft. Smith with 2 vehicles at \$0.625 per mile	Google Maps and IRS
	<b>Total</b>	<b>\$370</b>		
	<b>Total Project Costs</b>	<b>\$25,370</b>		
City Cash Match	Proposed	\$5,000	20% of historic context statement project budget proposed as cash match.	Fayetteville City Council
	<b>Total</b>	<b>\$5,000</b>		
<b>Grant Request</b>	<b>Total Requested from AHPP for 23-CLG</b>	<b>\$20,370</b>		

\*Project consultants were asked to provide a cost estimate for the project given the project description and area. Estimates ranged from \$17,750 to \$27,750, with travel being one of the major cost dependencies. Staff is using a weighted average for the \$25,000 cost estimate.

# OMB Circular A-133 Audit Certification Form

Audits of States, Tribal and Local Governments, and Non-Profit Organizations

*For Most Recent Fiscal Year Ending \_\_\_(month) 20\_\_\_*

<b>Grantee:</b>	
<b>EIN:</b>	<b>DUNS:</b>
Name of Authorized Chief Financial Officer:	
Address:	
Email:	Phone:

**Purpose:** The National Park Service (NPS) is required under the Office of Management and Budget (OMB) to monitor the Single Audit requirements of its grant recipients. This requirement ensures that federal funds are used for their authorized purposes. It also confirms that non-federal entities **expending** \$500,000 or more in FY 2014 (or \$750,000 or more in FY 2015) **in federal funds from all federal sources** during *their* most recently completed fiscal year, have submitted a Single Audit. OMB Circular A-133 can be found at <http://www.whitehouse.gov/omb/circulars>, and should be consulted when completing this form.

**Directions:** Your agency's Chief Financial Officer (CFO) must certify whether or not your agency/organization is subject to the Single Audit requirement by checking the appropriate box in Sections A and B and signing and dating the form. Failure to return a completed form will result in delay in processing your next grant award, withholding of federal awards or disallowance of costs, and suspension or termination of federal awards.

SECTION A Check Appropriate Box:	
<input type="checkbox"/>	We <b>did not exceed</b> the \$500,000/\$750,000 federal expenditure threshold for the FY referenced above. A Single Audit or a Program Specific Audit is not required for this fiscal year. <b>If checked, skip Section B.</b>
<input type="checkbox"/>	We <b>have exceeded</b> the \$500,000/\$750,000 federal expenditure threshold for the fiscal year referenced above. <b>If checked, complete Section B.</b>

SECTION B Entities that ARE subject to the requirements of OMB Circular A-133	
<b>Complete the information below and check the appropriate box:</b>	
<input type="checkbox"/>	We completed our last A-133 Audit on _____ for Fiscal Year ending _____. <b>There were <u>no findings</u></b> related to federal awards. No follow-up action is required. Was a complete copy submitted to the Federal Audit Clearinghouse? <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	We completed our last A-133 Audit on _____ for Fiscal Year ending _____. <b>There <u>were findings</u></b> related to federal awards. (If findings provide/email a copy of the audit with this form.) Were any findings related to CFDA 15.904? <input type="checkbox"/> Yes <input type="checkbox"/> No Was a complete copy submitted to the Federal Audit Clearinghouse? <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	Our completed A-133 Audit will be available on _____ for Fiscal Year ending _____. We will forward a copy of the audit report to the Federal Audit Clearinghouse at that time. If there are findings related to federal awards, we will also provide NPS a copy at that time.

I hereby certify that I am an individual authorized to complete this form. Further, I certify that the above information is true and correct and all relevant material findings contained in audit report/statement have been disclosed.

Signature of Authorized CFO: \_\_\_\_\_ Date:  
\_\_\_\_\_

Print Name & Title:  
\_\_\_\_\_

Form Revised 08/2015



## Frequently Asked Questions

### Single Audit Certification Forms

<b>Question:</b>	<b>Why am I being asked to certify Fiscal Year 2014 when it is 2015?</b>
Answer:	Grantees that <i>EXPEND</i> \$500,000/\$750,000 or more of federal funds in <i>THEIR</i> 2014/2015 most recently completed fiscal year must conduct a single audit. This form is a way for NPS to monitor its grantees audit status, as required by the Office of Management and Budget (OMB).
<b>Question:</b>	<b>Who needs to fill out this form?</b>
Answer:	Your agency's Chief Financial Officer (or designee).
<b>Question:</b>	<b>Who must sign the Audit Certification Form?</b>
Answer:	The Chief Financial Officer of the agency, or his or his designee.
<b>Question:</b>	<b>Does NPS need a copy of the audit?</b>
Answer:	<i>ONLY</i> submit a copy of the audit to NPS if there are "findings" listed in it specific to CFDA 15.904 (Historic Preservation Grants-in-Aid). However, a complete copy of the audit <b>MUST</b> be submitted electronically to the Federal Audit Clearinghouse.
<b>Question:</b>	<b>What is an audit finding?</b>
Answer:	Audit findings are significant issues identified in the audit report, which are commonly items related to non-compliance with terms and conditions in an award. Findings typically include lack of timely reporting, internal controls not being in place to fulfill grant requirements, etc.
<b>Question:</b>	<b>What if there is a finding related to CFDA 15.904?</b>
Answer:	The NPS will review the finding and request a Corrective Action Plan from the grantee, outlining how this issue will be resolved.
<b>Question:</b>	<b>Does the audit requirement apply to our subgrantees who received federal pass-through funds?</b>
Answer:	Yes. Subgrantees are subject to A-133, Single Audit requirements as well. Grant funds can be used to pay for the audit process.
<b>Question:</b>	<b>Who do I contact if I have questions about this form?</b>
Answer:	Contact your NPS grant manager.

U.S. Department of the Interior

**Certifications Regarding Debarment, Suspension and Other Responsibility Matters, Drug-Free Workplace Requirements and Lobbying**

Persons signing this form should refer to the regulations referenced below for complete instructions:

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - Primary Covered Transactions - **The prospective primary participant further agrees by submitting this proposal that it will include the clause titled, "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.** See below for language to be used or use this form certification and sign. (See Appendix A of Subpart D of 43 CFR Part 12.)

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions - (See Appendix B of Subpart D of 43 CFR Part 12.)

Certification Regarding Drug-Free Workplace Requirements - Alternate I. (Grantees Other Than Individuals) and Alternate II. (Grantees Who are Individuals) - (See Appendix C of Subpart D of 43 CFR Part 12)

Signature on this form provides for compliance with certification requirements under 43 CFR Parts 12 and 18. The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of the Interior determines to award the covered transaction, grant, cooperative agreement or loan.

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**PART A: Certification Regarding Debarment, Suspension, and Other Responsibility Matters- Primary Covered Transactions**

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*CHECK \_\_\_ IF THIS CERTIFICATION IS FOR A PRIMARY COVERED TRANSACTION AND IS APPLICABLE.*

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
  - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
  - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
  - (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
  - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

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**PART B: Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions**

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*CHECK\_xx\_\_\_ IF THIS CERTIFICATION IS FOR A LOWER TIER COVERED TRANSACTION AND IS APPLICABLE.*

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

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**PART C: Certification Regarding Drug-Free Workplace Requirements**

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*CHECK  IF THIS CERTIFICATION IS FOR AN APPLICANT WHO IS NOT AN INDIVIDUAL.*

Alternate I. (Grantees Other Than Individuals)

- A. The grantee certifies that it will or continue to provide a drug-free workplace by:
- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
  - (b) Establishing an ongoing drug-free awareness program to inform employees about--
    - (1) The dangers of drug abuse in the workplace;
    - (2) The grantee's policy of maintaining a drug-free workplace;
    - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
    - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
  - (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
  - (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
    - (1) Abide by the terms of the statement; and
    - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
  - (e) Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
  - (f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted --
    - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
    - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
  - (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a) (b), (c), (d), (e) and (f).
- B. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

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Check  if there are workplaces on files that are not identified here.

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**PART D: Certification Regarding Drug-Free Workplace Requirements**

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*CHECK  IF THIS CERTIFICATION IS FOR AN APPLICANT WHO IS AN INDIVIDUAL.*

Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to the grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

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**PART E: Certification Regarding Lobbying**  
**Certification for Contracts, Grants, Loans, and Cooperative Agreements**

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*CHECK \_\_\_ IF CERTIFICATION IS FOR THE AWARD OF ANY OF THE FOLLOWING AND THE AMOUNT EXCEEDS \$100,000: A FEDERAL GRANT OR COOPERATIVE AGREEMENT; SUBCONTRACT, OR SUBGRANT UNDER THE GRANT OR COOPERATIVE AGREEMENT.*

*CHECK \_\_\_ IF CERTIFICATION FOR THE AWARD OF A FEDERAL LOAN EXCEEDING THE AMOUNT OF \$150,000, OR A SUBGRANT OR SUBCONTRACT EXCEEDING \$100,000, UNDER THE LOAN.*

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

As the authorized certifying official, I hereby certify that the above specified certifications are true.

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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

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TYPED NAME AND TITLE

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DATE