

June 2, 2026



Crescent City Harbor District Grant Manager Services Proposal

Crescent City, California

Prepared for

**Crescent City
Harbor District**

Prepared by

**Sunstone Cities LLC
with Advocacy Chiefs LLC**

Primary Contact

Ryan Phong

Project Manager & Managing Member

 **Sunstone Cities LLC**

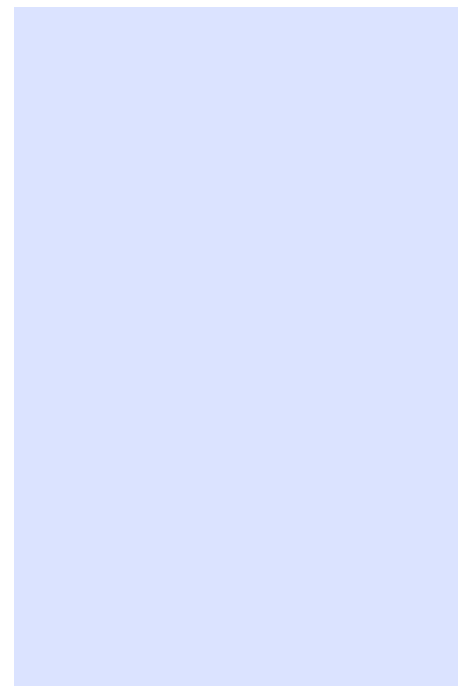
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Table of Contents

➤	Cover Letter	03
➤	Qualifications	04
➤	Relevant Project Experience	06
➤	Project Organization	09
➤	Project Approach	12
➤	Fees	14
➤	Timeline	15
➤	Federal Compliance	16



Cover Letter



Date: June 2, 2026

Kristina Hanks
Crescent City Harbor District
101 Citizens Dock Road,
Crescent City, CA 95531

Subject: Grant Manager Services Proposal for the Crescent City Harbor District

Dear Ms. Hanks,

Sunstone Cities, LLC is pleased to submit this proposal to provide Grant Manager services for the Crescent City Harbor District's U.S. Department of Transportation Maritime Administration Port Infrastructure Development Program (PIDP) awards. Sunstone Cities will serve as the prime consultant and single point of accountability. Advocacy Chiefs, LLC will serve as our subconsultant, bringing additional grant writing, grant administration, federal compliance, and stakeholder coordination capacity to the engagement. Scout will serve as the grant management technology partner, providing a centralized system for compliance tracking, document management, reporting support, risk monitoring, and audit-ready records.

We understand the District has secured two MARAD PIDP awards totaling \$15.3 million to advance a critical harbor resilience and working-waterfront project: a new seawall protecting Citizens Dock Road and the seafood packing and trucking area, and a new concrete-decked Citizens' Dock Pier 1 that will support on-dock businesses, improve cargo handling, and strengthen long-term port operations. This is not a routine reporting assignment. It is a grant management role tied to business continuity, commercial fishing, cargo movement, disaster resilience, and public infrastructure delivery.

Our approach is practical. We will convert the District's grant agreements, construction schedule, budget, contractor documentation, and federal requirements into a clear operating system for the project. That system will include a compliance calendar, reporting templates, monthly financial reconciliation, drawdown documentation, contractor and subrecipient monitoring, risk tracking, and grant closeout files organized so the District is prepared for MARAD review, Single Audit testing, and public accountability.

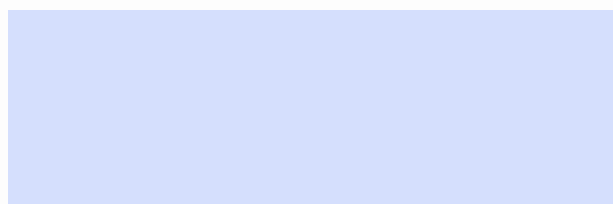
Sunstone Cities is a California economic development consulting firm that works with public agencies on implementation, grant management, infrastructure finance, staff augmentation, and public-sector strategy. Our team understands how federal funding requirements intersect with the day-to-day realities of city and district operations. Advocacy Chiefs complements that experience with grant writing, grant administration, public agency coordination, and federal compliance support for mission-driven and public-sector clients.

John P. Keisler, CEO & Managing Member of Sunstone Cities, is authorized to negotiate and commit the firm on this proposal. Contractual correspondence may be directed to John P. Keisler at 18881 Von Karman Avenue, Suite 500, Irvine, CA 92612, (949) 771-1764. Day-to-day proposal and project coordination may also be directed to Ryan Phong at Ryan.Phong@SunstoneCities.com.

We appreciate the opportunity to support the Crescent City Harbor District on a project that will protect critical waterfront infrastructure and strengthen the economic foundation of the harbor for years to come.

Respectfully,

John P. Keisler
CEO & Managing Member
Sunstone Cities LLC



Qualifications

▾ Firm Profile

Item	Response
Submitting Firm	Sunstone Cities LLC
Organizational Structure	California limited liability company; Sunstone Cities serves as prime consultant and Advocacy Chiefs, LLC serves as subconsultant.
Headquarters	18881 Von Karman Avenue, Suite 500, Irvine, CA 92612
Additional Office Location	1 World Trade Center, Suite 831, Long Beach, CA 90831
Number of Employees	11 employees, based in Southern California
Year Founded	2024
Designations	Small Business; Minority-owned business

Sunstone Cities is an economic development consulting firm built for public-sector implementation. The firm supports cities, special districts, ports, and public agencies with grant lifecycle management, economic development strategy, infrastructure financing, business support programs, staff augmentation, public-private partnership strategy, and communications that translate technical work into clear materials for decision-makers, funders, and the public.

For the District, that combination matters. The Grant Manager must protect federal funds and help the District tell a clear performance story: how the PIDP investment is improving safety, resilience, cargo movement, seafood industry operations, and the long-term competitiveness of Crescent City Harbor. Sunstone's economic development lens allows our team to manage compliance while also documenting the local value created by the project.

Why this team fits CCHD: Sunstone Cities brings municipal economic development, capital project, and implementation experience. Advocacy Chiefs adds grant writing, grant administration, compliance, and stakeholder coordination depth. Together, the team can manage the federal file while helping the District communicate the project's economic and operational value.

Qualifications

▾ Core Capabilities Relevant to the RFP

- Federal grant lifecycle management, including award setup, reporting calendars, drawdown support, documentation systems, closeout files, and audit readiness.
- Grant writing and funder-facing reporting, including quarterly narrative reports, performance summaries, board-ready updates, and federal grantor correspondence.
- Financial compliance support, including cost allowability review, budget-to-actual tracking, variance monitoring, match documentation, invoice support, and SF-425 coordination.
- Public infrastructure and capital project coordination, including construction milestone reporting, contractor documentation, and federal cross-cutting compliance.
- Economic development strategy, including business retention, workforce and industry analysis, infrastructure financing, and public-private partnership implementation.
- Stakeholder coordination, including agency coordination, public meeting support, contractor follow-up, and action-item tracking.

▾ Sunstone Cities Experience Base

Sunstone leadership has managed federal and public-sector funding environments at scales larger than the District's PIDP portfolio. Representative experience includes executive oversight of \$226 million in ARPA State and Local Fiscal Recovery Funds for the City of Long Beach; administration of \$5.3 million in U.S. Department of Defense Office of Economic Adjustment grants under 2 CFR Part 200; coordination of the \$43 million LB-MUST stormwater program involving the Port of Long Beach; and capital delivery experience connected to the \$520 million Long Beach Civic Center public-private partnership, which included the Port of Long Beach headquarters building.

▾ Advocacy Chiefs Qualifications

Advocacy Chiefs, LLC will support Sunstone Cities as subconsultant. The firm is led by Benjamin Cadranel, J.D., MAFM, and brings experience in grant writing, grant administration, public agency coordination, federal compliance, and multi-stakeholder engagement. Its work includes federal and state grant support for workforce, education, and public-sector clients; compliance audits; Comprehensive Local Needs Assessments; and grant portfolio administration. For this engagement, Advocacy Chiefs will support federal compliance review, reporting, stakeholder coordination, and grant documentation under Sunstone's direction.

▾ Scout Qualifications

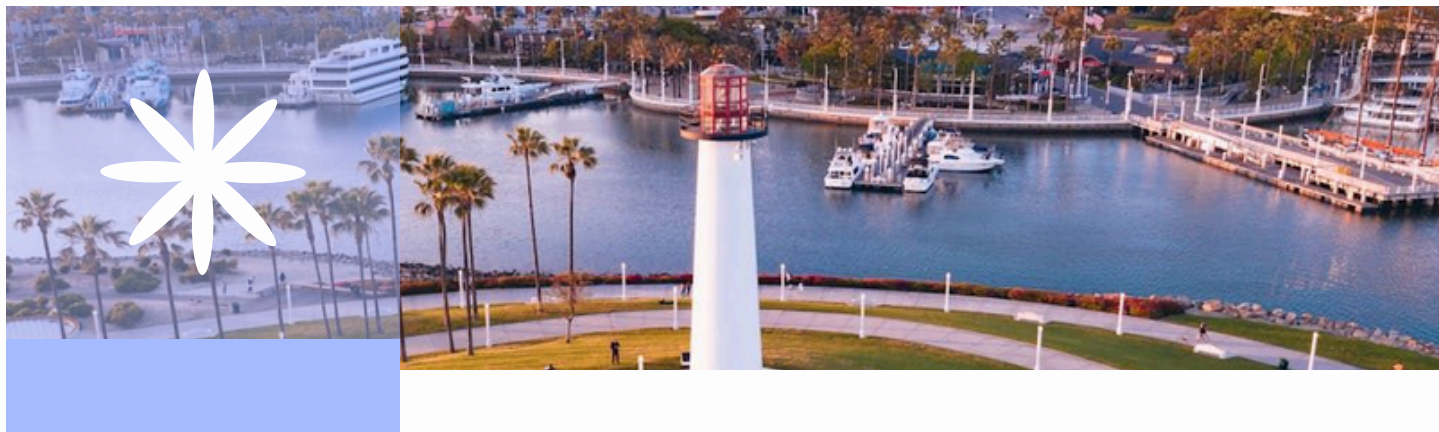
Scout will serve as the team's grant management technology partner. Scout is built for grant issuers managing modern funding programs and provides AI-powered tools for solicitation creation, applicant portal workflows, AI-assisted review, award administration, budget monitoring, performance tracking, compliance monitoring, fraud-risk detection, and audit trail maintenance. Scout will be used as the technology layer supporting the compliance calendar, audit-ready file structure, document management, reporting tracker, risk log, and performance dashboard. Sunstone will remain the prime consultant and single point of accountability; Scout will support the team's ability to maintain transparent, organized, and defensible grant records.

Relevant Project Experience

Project 1: Long Beach Workforce Innovation Network – Grant Acquisition, Administration, and Compliance

Category	Details
Client/Agency	City of Long Beach, Pacific Gateway Workforce Development Agency / Long Beach Workforce Innovation Network
Funding Programs	James Irvine Foundation workforce equity grants and HUD Community Development Block Grant funding
Approximate Funding	\$5.3 million across multiple grants, including a \$4.2 million Irvine Foundation award, a \$500,000 workforce equity grant, and a \$625,000 CDBG award
Period	October 2021 to present
Team Role	Advocacy Chiefs served as lead grant management and compliance advisor; Sunstone Cities is prime consultant for this CCHD proposal
Key Team Member	Benjamin Cadranel, J.D., MAFM

This engagement demonstrates direct grant management and reporting experience across a multi-year public-sector portfolio. Services included award setup, reporting calendar development, subaward structuring, expenditure tracking, match documentation, narrative reporting, partner coordination, and subrecipient oversight. The work required the same discipline the District will need for the PIDP awards: clear documentation, consistent reporting, and a grant file that connects approved uses of funds to measurable program outcomes. The project shows the team's ability to manage multi-year grant programs with public agency oversight, partner coordination, performance reporting, and documentation standards that support audit readiness.



Relevant Project Experience

▾ Project 2: City of Long Beach – APRA Federal Grant Administration

Category	Details
Client/Agency	City of Long Beach
Funding Programs	U.S. Department of the Treasury, American Rescue Plan Act State and Local Fiscal Recovery Funds
Approximate Funding	\$226 million
Period	2021-2024, including John Keisler's tenure as Director of Economic and Property Development
Team Role	Executive oversight of ARPA-funded economic development programs
Key Team Member	John P. Keisler

Under Mr. Keisler's leadership, the City implemented federally funded economic recovery programs with controls for eligibility, allowability, documentation, subrecipient coordination, and performance reporting. The work included expenditure tracking, reimbursement coordination, policy implementation, community partner management, and reporting for programs designed to support businesses, workers, and community recovery. Although ARPA differs from MARAD PIDP, the management functions are similar: federal funding must be tied to eligible uses, documented through a defensible file, reported on time, and managed in a way that protects the public agency from questioned costs and audit findings.



Relevant Project Experience

Project 3: Long Beach City College/Sierra College - Perkins V Federal Compliance and CLNA Support

Category	Details
Client/Agency	Long Beach Community College District and Sierra College
Funding Programs	U.S. Department of Education, Carl D. Perkins Career and Technical Education Act
Approximate Funding	Approximately \$6 million in annual Perkins funding under compliance and planning review
Period	2024 to present
Team Role	Federal compliance audit support, Comprehensive Local Needs Assessment support, and stakeholder coordination
Key Team Member	Benjamin Cadranel, J.D., MAFM

This work required federal compliance review, audit preparation, stakeholder coordination, documentation standards, and clear translation of compliance requirements into practical steps for an education agency. The CLNA work also required careful engagement with employers, faculty, students, and community partners to connect grant-funded work to workforce and economic outcomes. The engagement demonstrates Advocacy Chiefs' ability to support federal compliance, audit readiness, and stakeholder-driven documentation - all directly relevant to PIDP administration and the District's need for clear records throughout project delivery.

Additional Relevant Infrastructure and Economic Development Experience

Sunstone Cities also brings experience in infrastructure finance and economic development projects that inform this engagement. The team has supported economic development strategies, infrastructure financing concepts, business assistance programs, and public-sector implementation work for California agencies. That background will help the District frame the project not only as a construction effort, but as an investment in port resilience, commercial fishing, seafood processing, cargo movement, and working-waterfront competitiveness.



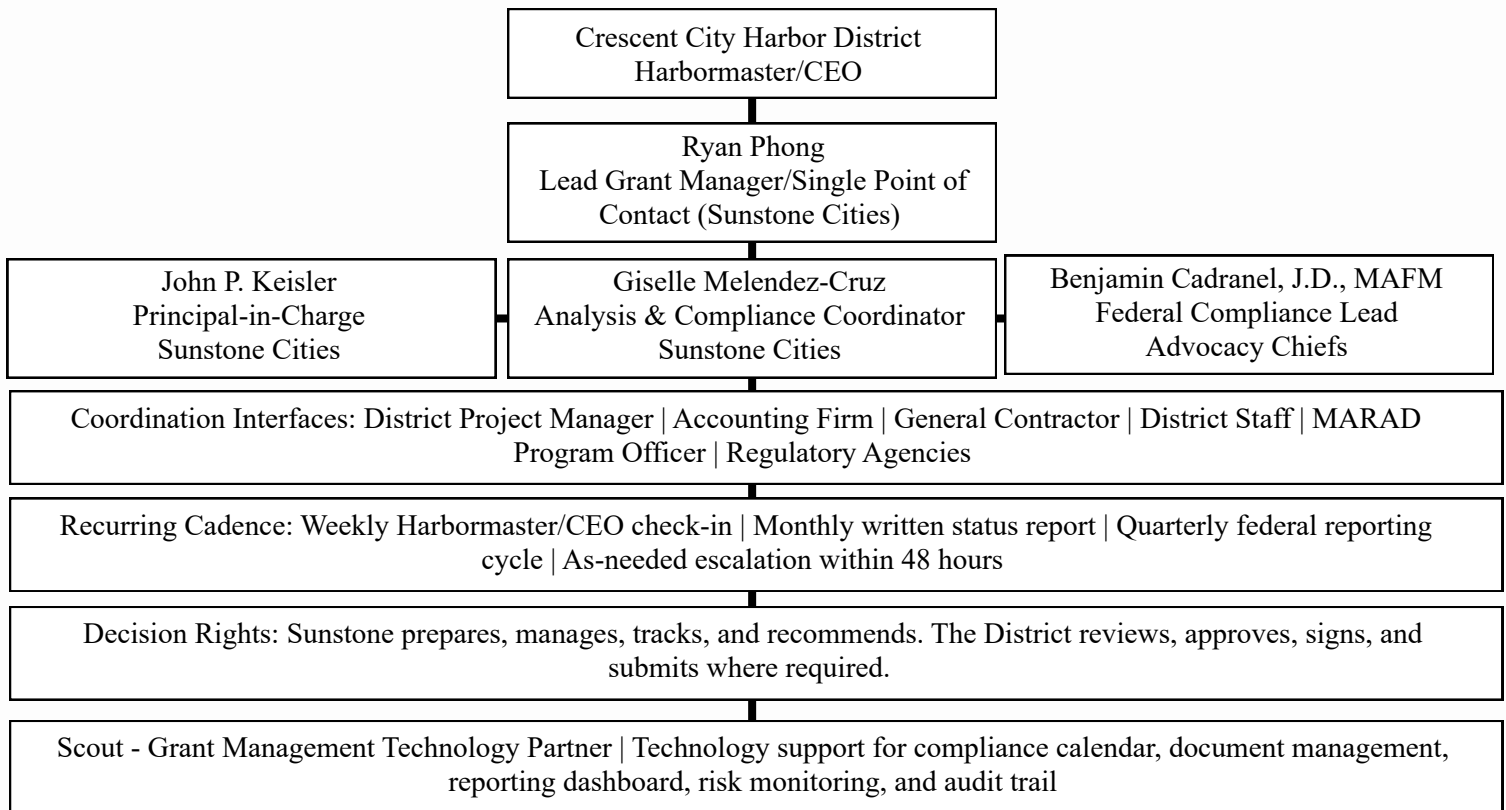
Project Organization

Delivery Structure

Sunstone Cities will serve as prime consultant and the sole contractual point of accountability to the District. Ryan Phong will serve as Lead Grant Manager and day-to-day point of contact, reporting directly to the Harbormaster/CEO. John P. Keisler will serve as Principal-in-Charge and executive escalation lead. Giselle Melendez-Cruz will support analysis, reporting, documentation, and dashboarding. Benjamin Cadranel of Advocacy Chiefs will serve as Federal Compliance Lead under Sunstone's direction. Tim Barnes of Scout will support the delivery structure as the grant management technology partner, helping the team maintain the compliance calendar, grant file, reporting dashboard, risk register, and audit trail in one organized system.

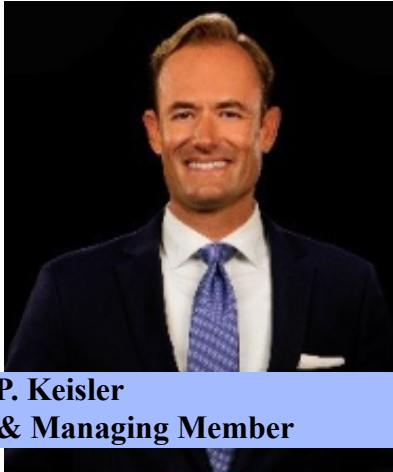
The team will coordinate with the District's Project Manager, Accounting Firm, General Contractor, District staff, MARAD, and other agencies as directed by the Harbormaster/CEO. The structure keeps the District's workflow simple: one lead contact, one project file, one reporting calendar, and one escalation path.

Organizational Chart



Project Organization

Project Team



John P. Keisler
CEO & Managing Member

Role: Principal Project Lead

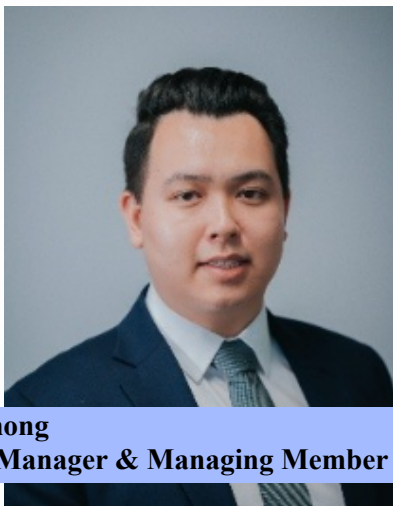
John Keisler brings more than 20 years of local government and economic development experience, most recently as Economic Development Director for the City of Long Beach, where he led one of California’s most active and recognized urban economic development departments for a city of approximately 500,000 residents. During his tenure, John directed implementation-oriented strategies across aerospace, port, university, innovation, and industrial sectors, oversaw public-private investment partnerships, and helped structure programs that bridged the gap between startup ecosystems and municipal policy goals. He has deep experience helping communities make the case for accelerator and incubator investments, structuring public-private funding frameworks, and ensuring those frameworks survive the scrutiny of elected officials, auditors, and outside funders.



Benjamin Cadranel
Principal & Founder, Advocacy Chiefs

Role: Federal Compliance Lead

Benjamin Cadranel, J.D., MAFM, is a seasoned philanthropy, development, and government relations executive with deep experience in higher education advancement, nonprofit leadership, and public-private partnerships. A licensed attorney holding a Masters in Accounting and Financial Management with more than 17 years of experience, Benjamin advises public agencies, municipalities, colleges, and mission-driven organizations on strategic funding, grants, governance, and partnership development, with a track record of securing over \$200 million in transformative funding support for workforce, entrepreneurship, and equity-focused initiatives. He also serves as Chair of the Yolo County Library Foundation, Treasurer of Yolo CASA, and Head of Government Relations at Scout Funding, bringing a distinctive blend of legal, financial, and policy expertise to every engagement. Known for advancing innovative, equity-centered solutions, Benjamin helps organizations turn complex funding opportunities into lasting community impact.



Ryan Phong
Project Manager & Managing Member

Role: Grant Manager Lead

Ryan Phong leads Sunstone Cities’ project management practice and serves as the day-to-day point of contact for public-sector clients. He manages consulting projects that advance economic development, infrastructure planning, and public-sector initiatives, with particular strength in developing research reports, policy memos, and council-ready presentations. Ryan also serves as program advisor for the annual USC Economic Development Challenge, where he manages relationships with client cities, mentors graduate student teams, and organizes final pitch events for innovative economic development strategies. His ability to translate complex analysis into clean, clear deliverables is a direct asset for this engagement.

Project Organization

Project Team



Giselle Melendez-Cruz
Research & Management Analyst

Role: Analyst & Compliance Coordinator

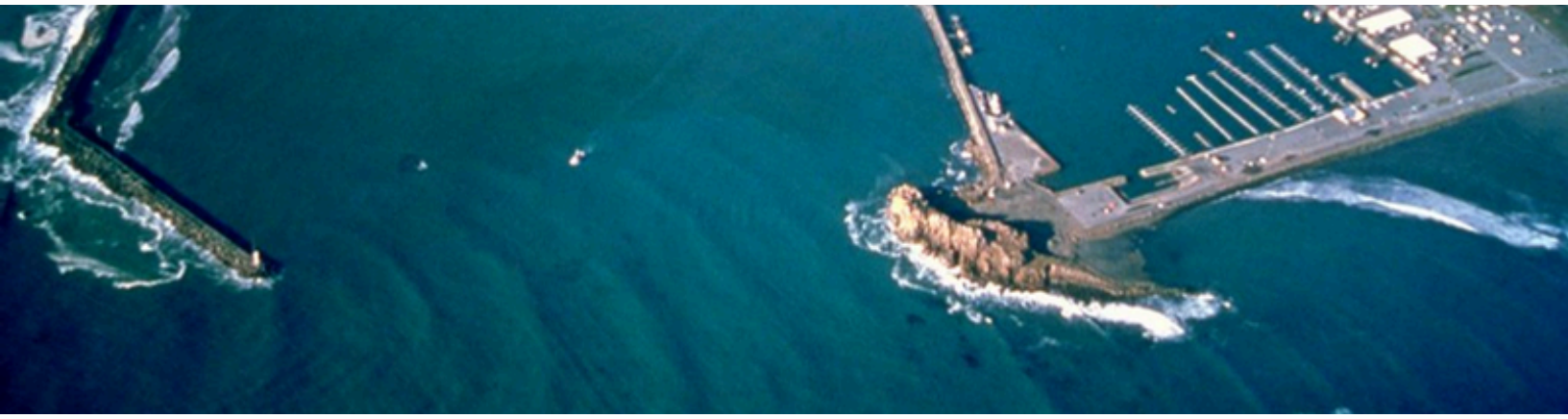
Giselle leads stakeholder coordination with public-sector clients and oversees the research and analysis components of Sunstone Cities' projects. Her work includes developing marketing and outreach materials, producing stakeholder reports, and supporting strategic planning efforts that advance economic development initiatives and public-private partnerships. She holds a Master of Public Administration from USC with a Graduate Certificate in City/County Management and brings specific experience in economic inclusion, community-based development, and cross-sector program coordination.



Tim Barnes
Co-Founder, Scout Funding, Inc.

Role: Technology Partner for Grant Management

Tim Barnes is the Co-Founder of Scout, where he is reimagining how organizations access non-dilutive funding by pairing AI technology with expert grant-writing support. Scout helps impact-driven organizations secure grants faster by matching them with relevant opportunities, automating much of the application-writing process, and managing ongoing compliance. Tim brings more than fifteen years of product and engineering leadership to this mission, with a track record of building and scaling solutions at high-growth companies. Across these roles, Tim has specialized in setting product vision and strategy, organizing and growing high-performing teams, and delivering scalable solutions that drive measurable business impact. His combination of technical depth, public health expertise, and proven leadership positions him to guide organizations through complex, high-stakes funding processes with efficiency and rigor.



Project Approach

The District needs a Grant Manager who can keep the project moving without creating extra administrative burden for harbor staff. Sunstone's work program is designed around that need. We will create a grant management operating system during the first 30 days, maintain it during construction, and use it to support federal reporting, financial management, contractor oversight, risk management, and closeout. Scout will provide the technology backbone for this operating system, allowing the team to track deadlines, documents, report inputs, risks, and audit records in a single structured environment.

The approach also uses a grant writing lens. Federal reporting is not just form completion; it is the written record of why the project matters, what was delivered, how federal funds were protected, and how the investment improved the working waterfront. Sunstone will help the District turn construction progress, compliance records, and community benefits into clear, credible, funder-ready documentation.

Task	Narrative Description	Key Deliverables
<p>1. Kickoff, Award Intake, and Grant Management Plan</p>	<p>Review PIDP grant agreements, notices of award, approved scope, approved budget, special conditions, reporting requirements, existing environmental documents, construction schedule, and procurement status. Confirm roles with the Harbormaster/CEO, Project Manager, Accounting Firm, and General Contractor.</p>	<p>Kickoff agenda; grant document request list; Grant Management Plan; responsibility matrix; decision and approval path.</p>
<p>2. Compliance Calendar and Audit-Ready File Structure</p>	<p>Build a master calendar for SF-425s, performance reports, BABA documentation, Davis-Bacon payroll reviews, DBE reporting, SAM registration, FFATA/FSRS reporting, closeout deadlines, and board or management updates. Establish a secure electronic file structure aligned to audit expectations. Scout will help manage the compliance calendar and automate the audit-ready file structure, including document categorization, version control, task reminders, and activity logs.</p>	<p>Master Compliance and Reporting Calendar; electronic grant file index; document naming protocol; retention protocol. Scout-enabled compliance tracker; automated audit-ready file framework.</p>
<p>3. Financial Management and Drawdown Support</p>	<p>Work with the Accounting Firm to reconcile invoices, budget categories, drawdowns, match documentation, and payment records. Review costs for allowability, allocability, reasonableness, and consistency with grant scope before drawdown support is prepared.</p>	<p>Monthly expenditure reconciliation; drawdown support package; cost allowability checklist; budget-to-actual dashboard.</p>
<p>4. Reporting and Performance Management</p>	<p>Prepare quarterly financial and performance reporting materials in MARAD's required format. Translate construction progress into concise narratives tied to safety, resilience, cargo efficiency, seafood business continuity, and port economic value. Scout will provide technology support for tracking report inputs, maintaining submission history, organizing source documents, and showing the status of review items before reports are finalized.</p>	<p>Draft SF-425 inputs; quarterly performance report; monthly dashboard; annual and ad hoc MARAD responses. Scout reporting dashboard; report-input tracker; submission history log.</p>
<p>5. Stakeholder Coordination and Project Updates</p>	<p>Coordinate with District leadership, District staff, the Project Manager, Accounting Firm, General Contractor, MARAD, and regulatory agencies as directed. Capture action items, decisions, issues, and deadlines in a shared log.</p>	<p>Weekly check-ins; monthly status reports; meeting notes; action item log.</p>

Project Approach

<p>6. Contractor and Subrecipient Oversight</p>	<p>Review contractor and lower-tier documentation for required flow-down clauses, SAM exclusion checks, Davis-Bacon payrolls, BABA certifications, DBE commitments and payments, and corrective actions. Coordinate with the Project Manager before payment on deficient documentation.</p>	<p>Flow-down matrix; contractor compliance checklist; Davis-Bacon review log; BABA register; DBE tracking log; corrective action memos.</p>
<p>7. Risk Management and Audit Support</p>	<p>Maintain a risk register covering schedule, cost, compliance, procurement, labor, environmental, and reporting risks. Escalate material issues within 48 hours and support MARAD monitoring or Single Audit requests.</p>	<p>Risk register; quarterly compliance review; audit support file; issue escalation memos; findings resolution log.</p>
<p>8. Grant Systems and Tools Management</p>	<p>Maintain the grant file, reporting tracker, dashboard, document logs, and account access inventory. Monitor SAM.gov and other federal registration requirements to avoid avoidable grant administration delays. Scout will serve as the grant management system for compliance tracking, award administration support, budget monitoring, performance tracking, risk alerts, immutable audit logs, and document management.</p>	<p>Systems access inventory; dashboard; compliance tracker; file maintenance record. Scout system configuration; Scout dashboard; audit trail export; compliance and risk tracking logs.</p>
<p>9. Closeout and Transition</p>	<p>Begin pre-closeout reconciliation before construction completion. Assemble final financial, performance, procurement, labor, BABA, DBE, environmental, equipment, and retention records for MARAD closeout.</p>	<p>Final SF-425 support; final performance report; closeout package; record retention memo; closeout briefing.</p>

Management Philosophy

- Make the federal requirements visible early. The first month establishes the calendar, file structure, roles, and reporting templates so the team is not reconstructing documentation after work is complete.
- Tie every drawdown to source documentation. Drawdown support will be built from invoices, payrolls, certifications, budget categories, and performance evidence that can withstand grantor and audit review.
- Keep reports useful for management. Monthly updates will be short, decision-ready documents that show budget, schedule, compliance, risks, and the next 60 days of deadlines.
- Tell the project story clearly. Performance reports will connect federal dollars to project outputs and economic development outcomes: resilience, safer cargo operations, seafood sector continuity, and port capacity.
- Communicate clearly, transparently, and diligently. Escalate issues before they become findings. Cost variances, reporting deadlines, missing certifications, BABA exceptions, Davis-Bacon concerns, DBE gaps, or environmental documentation gaps will be logged and elevated quickly.
- Use technology to reduce administrative burden. Scout will help centralize deadlines, documents, review status, risk alerts, and audit history so the District and consultant team can manage the grant file proactively rather than reconstructing records after the fact.

Fees

The District intends to contract on a time-and-materials, not-to-exceed basis and reserves the right to remove elements from the final award. This fee proposal assumes a one-year grant management budget. If the District requests a two-year budget or continued support through full project closeout, Sunstone can provide a revised second-year allocation for monthly coordination, reporting, compliance monitoring, Scout platform support, and closeout services.

▾ Labor Rate Schedule

Role/Labor Category	Firm	Fully Loaded Rates
Principal-in-Charge: John P. Keisler	Sunstone Cites	\$250/hour
Lead Grant Manager - Ryan Phong	Sunstone Cites	\$175/hour
Analysis & Compliance Coordinator - Giselle Melendez-Cruz	Sunstone Cites	\$150/hour
Federal Compliance Lead - Benjamin Cadranel, J.D., MAFM	Advocacy Chiefs	\$250/hour
Technology Platform Grant Lead - Tim Barnes	Scout	\$1,000/month

▾ Task-Level Fee Allocation

#	Scope Element	Est. Hours	Not-to-Exceed Fee
1	Grant Award Setup and Administration	60	\$9,000
2	Financial Management and Compliance	100	\$15,000
3	Reporting and Performance Management	120	\$18,000
4	Stakeholder Coordination	80	\$12,000
5	Subrecipient and Contractor Oversight	100	\$15,000
6	Compliance, Risk Management, and Audit Support	110	\$16,500
7	Grant Closeout	50	\$7,500
8	Grant Systems and Tools Management	40	\$6,000
9	Ongoing District Coordination, Updates, and Issue Identification	90	\$13,500
10	Scout Grant Management Platform	N/A	\$12,000 (12 months)
	Total Not-to-Exceed Amount	750	\$124,500

The blended rate for our staff is \$150/hour. Invoices will itemize labor by role, task, hours, rate, and description of work performed. Subconsultant charges will be separately identified. No out-of-scope work will be performed without written authorization from the District through the change process in the Professional Services Agreement.

Project Timeline

Sunstone is prepared to begin work immediately upon authorization from the District. The timeline below assumes notice to proceed in June 2026 and continues through construction closeout and PIDP grant closeout. The District's RFP schedule identifies major construction activity from 2026 through December 2027, including in-water seawall work in 2026, Pier 1 construction in 2027, and project closeout activities in late 2027. Sunstone's grant management timeline is structured around those milestones.

Scope Element	Start	End	Key Timing Notes
Grant Award Setup and Administration	Weeks 1-4 after NTP	Month 1	Complete grant management setup before first major drawdown package and contractor payment review.
Financial Management and Compliance	Month 1	Through closeout	Monthly reconciliation; peaks during active construction, major material purchases, and closeout reconciliation.
Reporting and Performance Management	Month 1	Through final report	Quarterly financial and performance reporting; monthly dashboard; ad hoc MARAD responses.
Stakeholder Coordination	Month 1	Through closeout	Weekly Harbormaster/CEO check-ins; monthly status reports; meeting notes and action item tracking.
Subrecipient and Contractor Oversight	Procurement /mobilization	Through final contractor closeout	Flow-down review, certified payrolls, BABA documentation, DBE tracking, corrective actions, and contractor compliance records.
Compliance, Risk Management, and Audit Support	Month 1	Through final contractor closeout	Risk register, quarterly control reviews, MARAD desk review support, Single Audit support, and issue escalation.
Grant Closeout	90 days before project closeout	Final MARAD closeout acceptance	Final SF-425 support, final performance report, compliance summaries, equipment/supply disposition, retention memo.
Grant Systems and Scout Tools Management	Month 1	Through transition	Electronic file structure, dashboard, calendar, access inventory, and document logs maintained throughout. Scout platform configuration, dashboard maintenance, compliance calendar tracking, and audit trail exports will be maintained throughout the one-year budget period.
Ongoing District Updates and Issue Identification	Month 1	Through closeout	Monthly written updates and 48-hour escalation for material risks or compliance exceptions.

Federal Compliance

Federal compliance will be built into the work plan from the first month, not treated as an end-of-project checklist. Sunstone will translate the requirements in the RFP, Exhibits 3 and 4, the PIDP grant agreements, and MARAD guidance into a working compliance matrix with responsible parties, due dates, required evidence, and file locations. That matrix will be tied to the compliance calendar and contractor documentation review process.

2 CFR Part 200/1201 Uniform Guidance

Maintain written procedures and grant file controls for cost allowability, allocability, reasonableness, procurement documentation, internal controls, equipment records, records retention, and closeout.

2 CFR Parts 180/1200 Debarment and Suspension

Verify SAM.gov exclusion status for covered transactions; collect lower-tier certifications where required; document checks before contract execution and during the period of performance.

Build America Buy America/2 CFR Part 184

Maintain a BABA register for iron, steel, manufactured products, and construction materials; collect manufacturer and supplier certifications before installation; track any waiver needs.

Davis-Bacon and Copeland Anti-Kickback

Collect weekly certified payrolls and statements of compliance; review wage classifications, wage rates, fringe benefits, deductions, and apprenticeship documentation; log exceptions and resolutions.

DBE Requirements/49 CFR Part 26

Track DBE commitments, payments, commercially useful function documentation, substitutions, and good-faith efforts; prepare required DBE reporting support.

Civil Rights and Nondiscrimination

Support Title VI, ADA, Section 504, Age Discrimination Act, and related flow-down documentation; track complaints or issues if any arise.

Environmental and Resource Commitments

Track NEPA FONSI, CEQA Mitigated Negative Declaration, permit conditions, mitigation measures, and evidence of completion against construction milestones.

Lobbying/49 CFR Part 20

Prepare lobbying certification support and SF-LLL documentation if triggered; confirm no federal funds are used for prohibited lobbying.

FFATA / FSRS Reporting

Identify reportable subawards or covered obligations and prepare FSRS reporting support within required timelines.

Tax Delinquency / Felony Conviction Certifications

Collect required certifications for covered transactions and support mandatory SAM checks and MARAD notification if any issue is identified.

Conflict of Interest and Public Records

Maintain conflict disclosure procedures; support CPRA-sensitive document handling; clearly mark confidential materials only where appropriate.

Texting While Driving and Other Flow-Down Terms

Track required federal clauses in the flow-down matrix and confirm inclusion in applicable contractor and subconsultant agreements.