

On December 11<sup>th</sup>, 2018, EPA Office of Brownfields & Land Revitalization held a webinar to assist applicants with preparing the FY19 Multipurpose, Assessment, and Cleanup Grant proposals. All questions posed by participants were responded to by an EPA representative. The recorded webinar is available at <https://epawebconferencing.acms.com/phqtl76hqsmz/>. If you have additional questions, please contact your Regional Brownfields Contact list in Section VII. of the Guidelines.

### GENERAL QUESTIONS AND ANSWERS

Q: I can apply for one cleanup and one assessment grant, correct?
A: Yes. You may apply for Assessment Grant funding and Cleanup Grant funding in the same competition year.
Q: Just making sure - there will be no RLF grants this round?
A: That is correct. The next RLF Grant competition will be in FY2020.
Q: Is the Cleanup Grant annual, when would the next grant period be?
A: The Brownfields Program issues an annual Cleanup Grant competition approximately the same time each year.
Q: Can applicants from all EPA regions utilize the TAB EZ tool?
A: Yes.
Q: How do I register to get in on further webinars?
A: This will be the only national webinar for the 2019 Brownfields Multipurpose, Assessment, and Cleanup Grant competition, however, each region will conduct their own information sessions. Please contact your regional contact found in Section VII of the Guidelines.
Q: Where are these 10 planning info sheets?
A: The planning information sheets are available on our website at <a href="https://www.epa.gov/brownfields/information-eligible-planning-activities">https://www.epa.gov/brownfields/information-eligible-planning-activities</a> .
Q: Do applications with Health Impact components receive priority?
A: No. Applications that include public health and health monitoring activities will be reviewed alongside all other proposals. Please review Section V. of the Guidelines for additional information on how the applications will be evaluated.
Q: Is there any opportunity to move funding from Assessment or Cleanup Grants to Multipurpose Grants if there is considerable interest in that new grant option?
A: No, the Assessment, Cleanup and Multipurpose Grant competitions are separate competitions and the BUILD Act limits EPA to spend no more than 15% of the fiscal year's appropriation on Multipurpose Grants.

<p>Q: I recall that previous applications allowed 15 pages. Required info doesn't seem to have changed so where is the cut back in narrative expected?</p> <p>A: There are fewer criteria in the FY19 competition.</p>
<p>Q: So all sections 1-4 where applicant Demonstrates, Describes, highlights, explains, outlines, details, addresses, etc. all to now fit in 10 pages? Has this ever been done before?</p> <p>A: We have fewer criteria to respond to this year (which is new). In turn, EPA has reduced the page limits. We encourage applicants to simply respond to the criterion and not include extraneous information that is not requested.</p>
<p>Q: So the narrative (former cover letter) is not included in the 10-page limit?</p> <p>A: That is correct. The Narrative Information Sheet is not included in the narrative page limit (10-page limit for Assessment and Cleanup Grants; 12-page limit for Multipurpose Grants).</p>
<p>Q: Are these cost tables part of the 10-page limit?</p> <p>A: Yes.</p>
<p>Q: Please confirm if a State Acknowledgement letter is required in a Community-wide Assessment Grant Application?</p> <p>A: Yes, the letter from the State or Tribal Environmental Authority acknowledging your grant activities is required for all Brownfield Grant applications.</p>
<p>Q: If the state agency is not the environmental regulator, will an acknowledgment letter still be necessary?</p> <p>A: Yes, a letter is required. Please check with your regional contact regarding this requirement.</p>
<p>Q: EPA encourages the lead assessment coalition entity to partner with 2 or more entities that have limited capacity. What if 2 of the members provide support to one entity that has limited capacity?</p> <p>A: That's fine. Please note, however, that assessment coalition grant applicants will be evaluated to the extent to which the funding will serve coalition partners and communities that would otherwise not have access to resources to address brownfield sites.</p>
<p>Q: Can EPA provide a MOA template for assessment coalitions?</p> <p>A: A sample MOA template is available on our website at <a href="https://www.epa.gov/brownfields/brownfields-assessment-coalitions-memorandum-agreement">https://www.epa.gov/brownfields/brownfields-assessment-coalitions-memorandum-agreement</a>. Additionally, please check with your regional contact found in Section VII of the Guidelines.</p>
<p>Q: Can Assessment Grants (community-wide) be sub-granted to entity where site is in private ownership for Phase I assessment?</p> <p>A: No, the private owner of the site is considered potentially liable for any contamination and also, they might or might not be an eligible entity.</p>

Q: Do the three deliverables under the Multipurpose Grant need to be completed for the same property?

A: The Multipurpose Grant activities can be completed on the same or different properties.

Q: If the brownfields owner applicant acquires a new brownfields site after the application deadline can Multipurpose Grant funds be used on that new site?

A: Yes. If selected for funding, you may expend Multipurpose Grant funds on another site that you own. At that time, you will provide additional information about the site for EPA or the state to determine if it is eligible for funding.

### THRESHOLD CRITERIA QUESTIONS AND ANSWERS

Q: What are the site ownership requirements for applicants?

A: Site ownership requirements will be covered in the Threshold section of this presentation. If you have further questions after that, please contact your regional office (listed in Section VII of the Guidelines).

Q: Is acquisition by a local government for purposes of economic development or blight removal considered an exercise of its sovereign function for purposes of CERCLA liability defense?

A: There are different requirements regarding eminent domain. Please check with your regional office for their legal opinion regarding this matter.

#### **Assessment Grants:**

Q: For the 70% expenditure of funds - what if you have committed funds (for additional or ongoing assessments) but your contractor has not yet invoiced you for the work. Can you document with planned approved work plans and associated costs?

A: No. The recipient must have received payment/reimbursement from EPA by January 1, 2019.

Q: If my municipality has a site that is being addressed by my county's current Assessment Grant, is my municipality eligible to apply for Assessment Grants on our own behalf before the county's funds are drawn down by 70%?

A: Yes, the municipality is be eligible to apply for their own Assessment Grant.

Q: Can a single entity applicant community-wide assessment apply for \$300K hazardous substances AND \$300K petroleum Or total of \$150K hazardous substances and \$150K petroleum?

A: The total is \$300K; which means you can divide it up between both hazardous substance and petroleum funding however you see fit.

Q: Do Assessment Grants require owner permission? (if the owner is not the grant applicant)

<p>A: EPA does not require owner permission at the time you submit the proposal for a Community-wide Assessment Grant. However, you will need to obtain the property owner's permission and secure access to the site before expending any grant funds.</p>
<p>Q: Is the MOA required for coalitions or are letters from coalition members sufficient?</p> <p>A: The letters from the coalition members is sufficient for submitting the proposal. However, if an MOA is already in place, the MOA can be submitted instead of the letters from each coalition member. Note, the MOA must be in place prior to the expenditure of any funds that are awarded.</p>
<p>Q: If several Counties form a regional Coalition to serve the cities and towns therein, do cities or towns that contain a target area need to be official members of a Coalition? Or is a letter sufficient? Will other communities within those counties still be eligible for grant funding?</p> <p>A: All partners of the coalition must provide a letter and plan to address at least one site in their jurisdiction. Also, members of the coalition are not eligible to apply for additional Brownfields funds. Counties that are members of the coalition would be able to assess properties for those other cities or towns.</p> <p>The individual city and town (that are not coalition partners) do not need to provide a letter and those communities are eligible to apply for their own funding.</p>
<p><b><u>Cleanup Grants:</u></b></p>
<p>Q: If a community currently has an open Cleanup Grant and has not billed 70% worth of expenses yet, would this make them ineligible or does this rule apply to only Assessment Grants?</p> <p>A: The rule/requirement only applies to current Assessment Grant recipients applying for FY19 Assessment Grants.</p>
<p>Q: Does a Cleanup Grant applicant have to attach documentation of ownership?</p> <p>A: You do not have to attach the deed, but you will need to provide information of site acquisition. Please see Section III.B. of the Cleanup Grant Guidelines.</p>
<p><b><u>Multipurpose Grants:</u></b></p>
<p>Q: Since the Multipurpose Grant includes funding that can be used for assessments, does an applicant that's previously received assessment money need to have spent 70% of it before applying for a Multipurpose Grant?</p> <p>A: No. The 70% drawdown requirement only applies to current Assessment Grant recipients who would like to apply for an Assessment Grant.</p>
<p>Q: If the applicant of a Multipurpose Grant has sites that have had previous Cleanup Grants can they use Multipurpose clean-up money at those sites?</p> <p>A: No.</p> <p>Correction to information provided during the webinar: Yes, sites on which Cleanup Grant funding has been expended may receive funding through a Multipurpose Grant.</p>

Q: Can a county apply for a Multipurpose Grant, with multiple target areas within, say, three small cities within the county?

A: Yes.

Correction to information provided during the webinar: Multipurpose Grant applicants may only identify one target area in which work will be performed.

Q: For the Multipurpose Grant: 1) Can the grant have co-applicants (with a lead applicant)?  
2) For the site ownership, can the site be owned by one of the applicants other than the lead?

A: 1) There may not be a co-applicant for Multipurpose Grants. 2) The site must be owned by the one applicant.

Q: Why does the Multipurpose Grant have a flat cost share contribution?

A: The Multipurpose Grant cost share of \$40,000 is based on a 20% match of a \$200,000 of the funding being used to remediate sites.

#### **PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION QUESTIONS AND ANSWERS**

Q: For Assessment Grants, when describing priority sites, do we need to show owner has agreed to have assessment and granted access?

A: No, not at that time. However, if selected for funding, you will need to obtain the property owner's permission and secure access to the site before expending any grant funds.

Q: For Assessment Grants, does the EPA have a preference (which will be scored higher) regarding outlining priority sites- 1 or 2 vs. 5?

A: Applicants should determine the number of priority sites to address with the grant and that can be described in the given page limit.

Q: Given the limit in pages, coalitions (RPCs) may have 4-8 coalition members. How can their individual TAs be described adequately (as required)?

A: Given the current space/page requirements, you might want to reconsider the number of coalition members...it can be as few as 3.

Q: Why is EPA concerned about projects near bodies of water? Are they given priority? Do they need to address adaptation scenarios?

A: Congress included information regarding projects adjacent to a body of water in the BUILD Act. As such, EPA is asking applicants to state whether their project is adjacent to a body of water. These projects may receive additional consideration during the final selection process (as outlined in Section V.B. of the Guidelines).

A: What constitutes a federally designated floodplain. FEMA flood zone A for example?

Q: Yes! A FEMA flood zone is a great example.

Q: How does the applicant demonstrate a potential renewable energy end use? Does that need to be in an existing revitalization plan? How does EPA verify that redevelopment? Can you provide any examples of what you have in mind?

A: It's a good idea to discuss if renewable energy is part of the community's revitalization plan and if it is, explain that in your proposal. Renewable energy can include wind, solar, geothermal, etc.

Q: I'm working with communities with abandoned timber mill sites. A lot of the time they are being reused for forest biomass energy projects. Does renewable energy from biomass count?

A: Yes.

Q: How population-specific do you expect health assessment data/information to be? I work in a small rural community and data is only available at the County level.

A: Please use the most specific data that are available for your town and be sure to document the source.

#### **COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS AND ANSWERS**

Q: Do we need support letters for community partners? excluding govt?

A: No, support letters from community partners is not required as part of the FY19 grant competition.

Q: For the Community Involvement section, is it acceptable to include JUST the sample format list, or should this be accompanied by narrative plans as well?

A: We leave it up to the applicant to determine how information will be presented. You may consider choosing one or the other to make sure you're able to include all of your responses within the page limit.

#### **TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS QUESTIONS AND ANSWERS**

Q: Does the applicant for a coalition assessment need to specify the amount of funding to be used for petroleum vs hazardous substances?

A: Yes. All applicants must specify the amount of hazardous substance and/or petroleum funding being requested.

Q: Can you define what activities are considered clean up?

A: Please refer to page 6 of the Cleanup Guidelines for information on eligible grant activities.

Q: How will reviewers rank proposals that have a significant amount of their budget dedicated to brownfield planning activities, as opposed to assessment tasks?

A: Please review the evaluation criteria in Section V. of the Guidelines for information on how EPA will evaluate applicant responses. Note, that projects that allocate at least 50% of the grant funds toward Phase I and Phase II environmental site assessments will be reviewed more favorably.

Q: Can you discuss the difference between direct and indirect costs? I don't anticipate having indirect costs, but need to understand it better.

A: Direct costs are those that are directly related to conducting the grant project while indirect cost are those that contribute but are not direct...such as overhead costs. Please review the Brownfields Frequently Asked Questions for more information on direct/indirect costs at <https://www.epa.gov/brownfields/frequently-asked-questions-about-multipurpose-assessment-rlf-and-cleanup-grants>.

Q: So there is no need to include indirect if we are only charging for direct costs? or just say that indirect costs will not be charged to the grant?

A: That's correct.

#### **PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE QUESTIONS AND ANSWERS**

Q: Can you use RLF awards as a recent brownfield grant example?

A: Yes - if you are the direct recipient of the RLF Grant that has the authority to issue the loan/subgrant.

Q: If applying as a coalition, do we speak to Brownfields grants received individually by partners, or speak to coalition awards only?

A: Only the lead applicant will need to discuss their past performances.

Q: For the final criteria that we include a statement about federal/non-federal assistance agreements, would an assistance agreement include any kind of grant from any external source?

A: Yes, any grants or assistance agreement from a federal or non-federal source that is of similar size and scope of the proposed project. Please reference Slide #72 in the presentation and provide that information on your past activities.