FY 2021 Brownfields Grant Guidelines

A Detailed Review of the
Multipurpose, Assessment, and Cleanup (MAC) Grant Guidelines

Welcome!

The purpose of this training webinar is to assist applicants with understanding the Multipurpose, Assessment, and Cleanup Grant Guidelines.

The Guidelines supersede any information provided in this presentation or by the presenters.

For site-specific questions on eligibility, please contact the Regional Brownfields Contact listed in Section VII. of the Guidelines.

Today's Agenda

- Competition Timeline

- General Overview

  - Types of Available Grants

  - Changes to the Program/Guidelines

  - Application Submission Requirements

  - Tips & Resources

- Overview of Threshold Criteria

- Overview of Ranking Criteria

- EPA Brownfield Program Contacts

EPA BROWNFIELDS AND
LAND REVITALIZATION

Revolving Loan Fund Grants

A solicitation for new Revolving Loan Fund Grants will <u>not</u> be issued in FY 2021.

EPA expects to solicit requests from existing, high-performing RLF grantees through a Federal Register notice for supplemental funding in early 2021.

Anticipated FY21 Competition Timeline

❖ **October 28, 2020**: Application submission deadline

❖ April – May 2021: Selections announced

❖ June – September 2021: Workplans and grant paperwork finalized

❖ September – October 2021: Grants awarded/funds become available

The submission due date will not change, however,

other dates listed above are subject to change.

Changes to the Guidelines

Eligible Applicants	• Applicants may only apply for Assessment Grant and/or Cleanup Grant funding **OR** Multipurpose Grant funding. • Organizations that were selected for an FY19 Multipurpose Grant may <u>not</u> apply for funding.
Grants.gov Requirements	• The SF-424 B is no longer required to submit an application.
Funding Requests	• Request one funding amount to address sites contaminated by hazardous substances and/or petroleum.
COVID-19 Impacts	• Technical difficulties in applying due to operational impacts related to COVID-19. • Alternatives to in-person community engagement.
Point Distributions	• Multipurpose Grant applications can score up to 170 pts. • Assessment Grant applications can score up to 160 pts. • Cleanup Grant applications can score up to 175 pts.

In this presentation, text in magenta denotes information that is new/revised.

For a complete list of changes, please review the "**Summary of FY21 Brownfields Multipurpose, Assessment and Cleanup Grant Guidelines Changes**" available at https://www.epa.gov/brownfields/multipurpose-assessment-rlf-and-cleanup-marc-grant-application-resources.

Types of Available Grants

	Assessment Grants	Cleanup Grants	Multipurpose Grants
Common Eligible Grant Activities	inventory, characterize & assess sites; revitalization planning; site-specific cleanup & reuse planning; community involvement	cleanup activities; reuse planning; community involvement	assessment & cleanup activities; revitalization planning
Applicant Eligibility (see full list in Section III.A.)	Government, Quasi Government, Regional Council, Tribe, Nonprofit Organization (501(c)(3)), Qualified Community Development Entity (45D(c)(1))		
		Nonprofit organizations not organized primarily for profit (e.g., 501(c)(6) organizations)	
Amount of Funding Available for Sites Contaminated w/ Hazardous Substance and/or Petroleum	**Community-wide** • Up to $300,000 **Site-specific** • Up to $200,000 or up to $350,000 with a waiver **Assessment Coalition** • Up to $600,000 • EPA encourages the lead entity to partner with two or more entities with limited capacity	**Single-site** • Up to $500,000 per site **Multi-site** • Up to $500,000 per application Applicants may submit 1 application totaling up to $500,000	**Community-wide within ONE Target Area** • Up to $800,000
Cost share Requirement	n/a	20%	$40,000
Period of Performance	3 years	3 years	5 years
Anticipated # of Awards	87	26	10

Overview of What to Prepare

- **Narrative Information Sheet**

    o 2 pages, single-spaced

    o Place information on your organization's letterhead.

    o Attach the State/Tribal Acknowledgement Letter to the Narrative Information Sheet. (Does not count toward page limit.)

    More info on slide 41

- **Narrative**

    o 10 pages, single-spaced for Assessment and Cleanup applications.

    o 12 pages, single-spaced for Multipurpose applications.

    o Excess pages will be removed and not reviewed.

- **Required Attachments**

    o Limit attachments to required/relevant documents (i.e., threshold criteria, documentation of leveraged resources, etc.).

    See Section IV.C. and IV.E. for details

EPA BROWNFIELDS AND LAND REVITALIZATION

Naming Contractors or Subrecipients in Applications as Partners

- Before naming a third party who will receive funding under the Brownfields Grant, carefully review the "contracts and subawards" guidance in EPA's Solicitation Clauses (Section IV.H. of the guidelines).

- Contracts:
  - With the exception of states, all recipients must comply with the Procurement Standards of 2 CFR Part 200.

  - EPA has posted **Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements** as guidance for recipients other than states.

  - Naming a contractor (including consultants) as a "partner" in your application does not justify a sole source procurement. All contracts in excess of $10,000, with very few exceptions, are subject to competition.

  - You must describe the process you followed in selecting the contractor for EPA to consider the partner's qualifications.

- Subawards:
  - Subawards may be made to nonprofit organizations, units of government, and institutions of higher education without competition. Refer to Appendix A of EPA's Subaward Policy for additional guidance.

Applications Released Under FOIA

- Every year, EPA receives requests via Freedom of Information Act for copies of submitted applications.

- EPA recommends that you do not include confidential business information (CBI) in your application.

- However, if CBI is included, applicants must clearly indicate which portion(s) of their application they are claiming as CBI.

- If no claim of confidentiality is made, EPA is not required to make the inquiry to the applicant otherwise required by 40 CFR 2.204(c)(2) prior to disclosure.

Tips for Writing the Narrative

- Read the entire Guidelines for the grant type for which you're applying.

- Write as though the reader knows **<u>NOTHING</u>** about your community.

- Avoid using acronyms and technical/organizational jargon.

- Number pages and enumerate/identify the criterion.

- **Address <u>ALL</u> criteria. If a criterion doesn't apply, state that and explain why.**

- The **<u>quality</u>** of the response is extremely important (see Evaluation Criteria in Section V.).

- Organize attachments, for example:

  Attachment A: Threshold Criteria

  Attachment B: Cleanup Grant Leveraging Commitment(s)

- Use the Application Checklist in Section IV.C. (do not submit with application).

- Readability is important! Advise 1" margins; 12 pts font; Times New Roman/ Arial/Calibri font; no maps.

Application Writing Resources

- **Office of Brownfields & Land Revitalization Website**
  - FY21 Summary of Brownfields Guidelines Changes and Frequently Asked Questions
  - Brownfields Program Factsheets
    - ❑ Eligible planning activities (for Assessment and Multipurpose Grants)
    - ❑ Health monitoring activities
    - ❑ Social distance engagement ideas
    - ❑ Renewable energy & energy efficient approaches in brownfields redevelopment

- **Upcoming Regional EPA Events** – See the "Materials to Download" pod

- **Technical Assistance to Brownfields (TAB) Communities Providers**

New Jersey Institute of Technology (NJIT)
Serves EPA Regions 1, 3 and 4
Colette Santasieri
973-642-4165 - santasieri@njit.edu

Center for Creative Land Recycling (CCLR)
Serves EPA Regions 2, 9 and 10
Ignacio Dayrit
415-398-1080 x107 - ignacio.dayrit@cclr.org

Kansas State University (KSU)
Serves EPA Regions 5, 6, 7, and 8
Blase Leven
785-532-0780 - baleven@ksu.edu

CENTER FOR CREATIVE LAND RECYCLING
RECLAIM. CONNECT. TRANSFORM.

KANSAS STATE UNIVERSITY

NJIT
New Jersey Institute of Technology

Brownfield MAC Grants - Preparing a Competitive Application
Wednesday, September 30, 2020 | 1:00-2:15 pm CT

Sean Vroom
New Jersey Institute of Technology (NJIT)

Ignacio Dayrit
Center for Creative Land Recycling (CCLR)

Maggie Egbarts
Kansas State University (KSU)

Debi Morey
KSU TAB Partner

CLICK HERE TO REGISTER

EPA BROWNFIELDS AND LAND REVITALIZATION

Your www.grants.gov Application Package

1. Application for Federal Assistance (SF-424)

2. Budget Information for Non-Construction Programs (SF-424 A)

3. Preaward Compliance Review Report (EPA Form 4700-4)

4. EPA Key Contacts (Form 5700-54)

5. Project Narrative Attachment Form, as one file (if possible) include:
   - ✓ Narrative Information Sheet
   - ✓ Narrative (responses to ranking criteria)
   - ✓ Required Attachments

- A workplan is not required at time of submission. Applicants that are selected for funding will negotiate a workplan with EPA before the cooperative agreement is awarded.

- Sample forms are available on the Brownfields MARC Application Resources webpage.

Requirements to Submit an Application

REQUIREMENT	ACCEPT ✅	REJECT ❌
9-digit DUNS number	• The correct DUNS number for your organization/department is listed on the Standard Form 424 • The same DUNS number must be used on future applications	• Another organization's/department's DUNS number is listed on the Standard Form 424
Active www.sam.gov account through October 28, 2020	• Registered with the same, correct DUNS number • The account is active and matches the applying entity's info	• Inactive/expired account • Account is being updated, but is in "processing" status
Active www.grants.gov account	• Associated with same, correct DUNS number	• Application is not submitted through Grants.gov solely due to an incomplete registration/inactive account
Submission by the Authorized Organization Representative (AOR)	• Designated in Grants.gov by the E-business POC (listed in sam.gov) • Has a Grants.gov account • Submits the application in Grants.gov	• Someone other than the designated AOR submits the application

Resources:

❑ Applicant FAQs and training videos on the www.grants.gov website.
❑ Brownfields Frequently Asked Questions and Grants.gov Tip Sheet.

The Application Has Been Submitted – Now What?

After signing and successfully submitting the application package, within 24 to 48 hours the AOR should receive a series of notification emails from www.grants.gov.

If the AOR did not receive notification emails or the application package did not transmit successfully, immediately **contact the www.grants.gov Help Desk** (open 24/7; except federal holidays) at 1-800-518-4726. **Make sure to get a case number.**

Applications that are not successfully submitted **and 'validated'** by the deadline will be considered late and will be rejected.

Exceptions to Applying through Grants.gov

Limited or No Access to Internet

- Must request a waiver at least 15 calendar days before the deadline
- EPA must approve the request
- See procedures in Appendix 1 of Guidelines

NEW

Operational Impacts Due to COVID-19

Email your request to Jerry Minor-Gordon (minor-gordon.jerry@epa.gov) by **October 28, 2020 at 11:59 PM ET**. Your request must include:

- an explanation of the COVID-19 related issue you are experiencing;
- the specific reason you are unable to submit the application through www.grants.gov; and
- **the complete application**.

There's no guarantee EPA will approve the request.

Every effort must be made to complete all prerequisites in order to apply through www.grants.gov.

EPA BROWNFIELDS AND LAND REVITALIZATION

Questions & Progress Check

Introductions and Timeline

General Overview

NEXT: Overview of Threshold Criteria

Overview of Ranking Criteria

Project Area Description & Plans for Revitalization

Community Need & Community Engagement

Task Descriptions, Cost Estimates, & Measuring Progress

Programmatic Capability & Past Performance

Wrap-up

Threshold Criteria Overview

Every application must clear the Threshold Requirements.

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Threshold Criteria - Attach Responses to Application

MULTIPURPOSE (MP) APPLICATIONS	ASSESSMENT APPLICATIONS		CLEANUP APPLICATIONS
	Community-Wide and Coalition	Site-Specific	
Applicant Eligibility			
Community Involvement			Community Notification
NEW Planned Use of Grant Funds	Expenditure of Previous Assessment Grant Funds		Previously Awarded Cleanup Grants
Required Cost Share		Waiver of the $200,000 Limit (if applicable)	Statutory Cost Share
Target Area		Basic Site Information	
Affirmation of Brownfield Site Ownership			Site Ownership
Brownfield Site Definition		Brownfield Site Definition	
			Required Environmental Assessment
		Status and History of Contamination at the Site	
		Enforcement or Other Actions	
		Sites Requiring a Property-Specific Determination	
		Threshold Criteria Related to CERCLA/Petroleum Liability	
			Cleanup Authority and Oversight

Applicant Eligibility

- Describe how you are an eligible entity (complete list in Section III.A.)

  o For entities that are cities, counties, tribes, or states, affirm that the organization is eligible for funding.

  o For entities other than cities, counties, tribes, or states, attach documentation of your eligibility (e.g., resolutions, statutes, etc.).

  o For nonprofit organizations and qualified community development entities, attach documentation certifying the organization's status.

  o Assessment Coalitions must document how all coalition members are eligible entities.

    Attach a current *Memorandum of Agreement* or signed letters from all coalition members in which they agree to be part of the coalition.

Click here for an example MOA template

Community Notification (Cleanup)

Attach draft ABCA(s) to your application

■ Provide an opportunity for the community to submit comments on your application <u>and</u> the draft Analysis of Brownfields Cleanup Alternatives (ABCA).

■ Publish an ad (or equivalent) about intent to apply and notice of a public meeting.

■ Notify the community at least **2 weeks before submitting the application** and **no later than** October 14, 2020.

■ Include in ad:

➤ Date, time, and location of meeting
➤ Where the application/draft ABCA are located
➤ How the public can submit comments

■ Host the public meeting (in-person, virtually, and/or by teleconference) <u>after</u> the ad is published, but <u>before</u> submitting the application.

See full requirements in III.B.12. of the guidelines and additional guidance in <u>FAQ K.13.</u>

Community Involvement (Assessment and MP)

- Applicants must identify how you will "inform and involve the community and other stakeholders."

  - Tie this to your response to ranking criterion *2.b. Community Engagement*.

  - Ranking criterion *2.b.iii. Incorporating Community Input* now requests applicants to discuss "communication methods that offer an alternative to in-person community engagement in the event of social distancing or other restrictions as a result of COVID-19."

- Community involvement efforts can be implemented using existing meetings.

  If you are applying for Assessment Grant and Cleanup Grant funding, the Assessment Community Involvement threshold criterion can be satisfied by using the Cleanup Grant Community Notification process.

Use of Grant Funds (Multipurpose)

> **Assessment + Cleanup + Planning**

- Indicate on which page of the application information on your plan to conduct assessment and cleanup activities, and to develop an overall plan for revitalization of the target area, if a plan does not exist, can be found.

- If an overall plan for revitalization of the target area already exists, please state this in your response.

> **Information that is referenced can be in the written narrative or the budget table.**

EPA BROWNFIELDS AND LAND REVITALIZATION

Expenditure of Assessment Grant Funds (Assessment)

- Current EPA Assessment Grant recipients must draw down at least 70% of each Assessment cooperative agreement by **October 1, 2020** before applying for additional Assessment Grant funding. (*Section III.B.3.*)

  Attach a copy of a financial record displaying the amount of funds drawn down (e.g. a report from the Automated Standard Application for Payments (ASAP) or general ledger entries).

- Otherwise: Affirm you do not have an active EPA Brownfields Assessment Grant.

Previously Awarded Cleanup Grants (Cleanup)

Affirm that the proposed site(s) has not received funding from a previously awarded EPA Brownfields Cleanup Grant. (*Section III.B.2.*)

Required Cost Share (MP & Cleanup)

A cost share - also known as a 'match'

- The cost share can be contribution of money, labor, materials, or services from a non-federal source
  - Only for an eligible and allowable expenses
  - Must be incurred after grant is awarded (or up to 90 days prior to award)
    - ❖ Including administrative costs up to 5% of the requested funds
  - HUD CDBG funds can be used to meet the cost share
- Hardship waivers for Cleanup Grants can be requested by:
  - government entities with populations of 50,000 and fewer
  - tribes
  - nonprofit organizations
- Approved on a limited basis
- Must provide explanation as an attachment

Do not exceed the required match!

Cleanup = 20% of requested funds

MP = $40,000

No waivers for Multipurpose

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Target Area (Multipurpose)

- Identify <u>one</u> target area.
- Target area may include a number of neighboring towns, a district, a shared planning area, or a census tract.
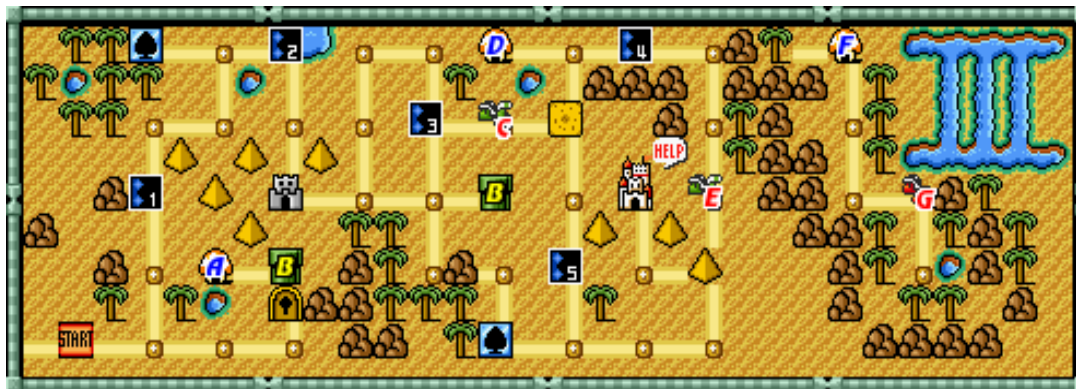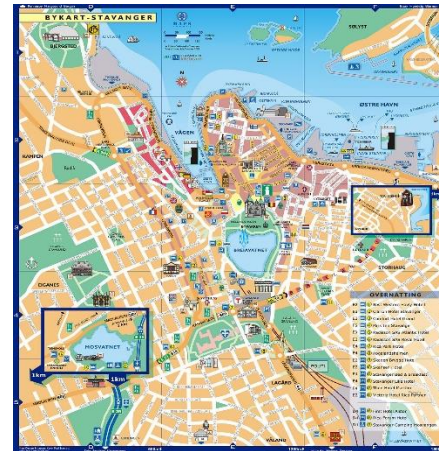
Site Ownership (MP & Cleanup)

By October 28, 2020:

- **Cleanup Grant applicants** must own site(s) listed in the application.
  - Fee simple title through a legal document (recorded deed)…
  - …unless EPA approves a different ownership agreement (for example, a nominee agreement or 99-year irrevocable lease) → **Talk with EPA NOW to make sure the arrangement will be approved**
- **MP Grant applicants** must affirm that they own a site in the target area that meets the definition of a brownfield. The applicant is not required to address this site if selected for funding.

Basic Site Information (Site-Specific Assessment & Cleanup)

Identify the name, address, and current owner of the site.

Status and History of Contamination
(Site-Specific Assessment & Cleanup)

Identify:

- whether this site is contaminated by hazardous substances and/or petroleum;

- the operational history and current use(s) of the site;

- environmental concerns, if known, at the site; and

- how the site became contaminated, and to the extent possible, describe the nature and extent of the contamination.

Brownfield Site Definition
(MP, Site-Specific Assessment & Cleanup)

Affirm that the site is:

- not listed or proposed for listing on the National Priorities List;

- not subject to orders under CERCLA; and

- not subject to the jurisdiction, custody, or control of the U.S. government. (*Note: Land held in trust by the U.S. government for an Indian tribe is eligible for brownfields funding.*)

Environmental Assessment Requirement (Cleanup)

A written ASTM E1903-19 or equivalent Phase II environmental site assessment report (a draft report is sufficient) must be completed prior to application submission. *(Cleanup Grant guidelines III.B.7.)*

- Describe the type of environmental assessments conducted at your proposed site (do not attach assessment reports).

- Provide the date of the Phase II or equivalent report.

Enforcement or Other Actions (Site-Specific Assessment & Cleanup)

Identify known ongoing or anticipated environmental enforcement or other actions related to the brownfield site…

…by describing any inquiries, or orders from government entities regarding the responsibility of any party (including the applicant) for the contamination, or hazardous substances at the site, including any liens.

NEW

Alternatively, affirm there are no known ongoing or anticipated environmental enforcement or other actions.

Sites Needing Property-Specific Determination
(Site-Specific Assessment & Cleanup)

Certain types of sites require a property-specific determination in order to be eligible for funding (rare cases).

- Refer to Section III.C.5. in the Assessment Guidelines, Section III.B.9. in the Cleanup Guidelines, or Section 1.5. of the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k) to determine whether your site requires a property-specific determination.

- Contact your Regional Brownfields Contact listed in Section VII. if you think your site requires a property-specific determination.

- If your site requires a property-specific determination, then you **must attach the information** requested in the Brownfields FAQs.

- If not required, **affirm that the site does not need a property-specific determination**.

Threshold Criteria Related to CERCLA/Petroleum Liability (Site-Specific Assessment & Cleanup)

Which Type of Site Contamination? → **Petroleum Sites** (Slide 38)

Hazardous Substance Sites

Defense to CERCLA Liability

i. Exempt from CERCLA
(Slides 33-35)

ii. Publicly owned sites acquired prior to 1/11/02
(Slide 36)

iii. Landowner Liability Defenses
(Slides 37-38)

Threshold Criteria Related to CERCLA Liability (Site-Specific Assessment & Cleanup)

Sites contaminated with hazardous substances, contaminants, pollutants, controlled substances, and mine scarred land wastes; and sites co-mingled with petroleum product where hazardous substances are the predominant contaminant.

i. **Exemptions to CERCLA Liability**

   1. Site Is Not Owned by the Applicant (*Assessment Grants only*)

   2. Indian Tribes

   3. Alaska Native Villages and Alaska Native Corporations

   4. Property Acquired under Certain Circumstances by State and Local Government

ii. **Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002**

iii. **Defenses to CERCLA Liability (e.g., the bona fide prospective purchaser defense)**

Threshold Criteria Related to CERCLA Liability (Site-Specific Assessment only)

i.   **Exemptions to CERCLA Liability**

    1. Site Is Not Owned by the Applicant

        – **Did the applicant cause or contribute to the contamination?**

        – **What's your relationship with the owner?**

        – **How will you gain access to the site?**

Threshold Criteria Related to CERCLA Liability (Site-Specific Assessment & Cleanup)

i. Exemptions to CERCLA Liability (cont'd)

2. Indian Tribes

    Indian tribes are exempt from demonstrating that they meet the requirements of a CERCLA liability defense to be eligible for a Brownfields Grant.

    – **Affirm the applicant is an Indian tribe.**

3. Alaska Native Village Corporations and Alaska Native Regional Corporations

    Acquired title to property under the Alaska Native Claims Settlement Act.

    – **How and when was the property acquired?**

    – **Did you cause or contribute to the contamination?**

Threshold Criteria Related to CERCLA Liability (Site-Specific Assessment & Cleanup)

i. Exemptions to CERCLA Liability (cont'd)

4. Property Acquired under Certain Circumstances by State and Local Government

Acquired title to a property by:

- Seizure or in connection with law enforcement activity;
- Bankruptcy;
- Tax delinquency; or
- Abandonment.

– **How and when was the property acquired?**

– **Did you cause or contribute to the contamination?**

– **Did you arrange for the disposal/transportation of contamination?**

Threshold Criteria Related to CERCLA Liability (Site-Specific Assessment & Cleanup)

ii. **Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002** (state or local governments only)

Public entities that acquired property <u>prior</u> to January 11, 2002.

Eligible even if the entity does not qualify as a bona fide prospective purchaser.

– **How and when was the property acquired?**

– **Did the applicant cause or contribute to the contamination?**

– **Did you arrange for the disposal/transportation of contamination?**

Threshold Criteria Related to CERCLA Liability
(Site-Specific Assessment & Cleanup)

iii. **Defenses to CERCLA Liability**

1. Asserting a bona fide prospective purchaser (BFPP) defense (the most common defense).

   Property acquired <u>after</u> January 11, 2002.

   – **How and when was the property acquired?**

   – **What environmental due diligence was performed before acquisition?**

   – **Did you arrange for the disposal/transportation of contamination?**

   – **What happened on the property after acquisition? What steps were taken to stop and prevent future releases?**

Threshold Criteria Related to CERCLA Liability
(Site-Specific Assessment & Cleanup)

iii. **Defenses to CERCLA Liability**

2. Non-public entities that acquired property <u>prior</u> to January 11, 2002 may be eligible for a Brownfields Grant.

- **How and when was the property acquired?**

- **What environmental due diligence was performed before acquisition? Was it customary at the time?**

- **Did you arrange for the disposal/transportation of contamination?**

- **What happened on the property after acquisition? What steps were taken to stop and prevent future releases?**

Threshold Criteria Related to Petroleum Liability
(Site-Specific Assessment & Cleanup)

- Sites contaminated with petroleum and petroleum product.

- State environmental agency (or EPA) will determine if the site is eligible.

- EPA will determine eligibility for Tribes.

- Petroleum Eligibility Letter must be attached to application.

Petroleum determination should be completed before submitting your application.

– **Who contaminated it?**

Who are the current and previous owners?

Current AND previous owner must not be responsible for contamination.

– **If current or previous owner is responsible…**

Are they financially viable?

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Cleanup Authority and Oversight Structure (<u>Cleanup</u>)

- Cleanup Oversight
  - Describe the oversight plan.
  - Indicate if you plan to enroll in state or tribal Voluntary Cleanup Program.
  - If not enrolling, describe how you will provide or acquire the necessary technical expertise to conduct and oversee the cleanup.

- Adjacent Property(s) Access Plan
  - Plan to obtain access to adjacent properties, if needed.

Required Attachment:
Letter from State or Tribal Environmental Authority

- Include a current letter acknowledging your specific application and your plans to apply for grant to conduct/oversee assessment and/or cleanup activities.

- State and Tribal environmental authorities do not need to provide a letter for themselves.

Do not substitute a letter from local or county oversight agencies.

Attach letter to the Narrative Information Sheet.

Do not use last year's letter.

Do not substitute an enforcement letter from the state regarding a specific site action.

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Questions & Progress Check

Introductions and Timeline

General Overview

Overview of Threshold Criteria

NEXT: Overview of Ranking Criteria

Project Area Description & Plans for Revitalization

Community Need & Community Engagement

Task Descriptions, Cost Estimates, & Measuring Progress

Programmatic Capability & Past Performance

Wrap-up

EPA BROWNFIELDS AND
LAND REVITALIZATION

Ranking Criteria

	Multipurpose	Assessment	Cleanup
Project Area Description and Plans For Revitalization	45 pts	45 pts	50 pts
Community Need and Community Engagement	35 pts	35 pts	35 pts
Task Description, Cost Estimates, & Measuring Success	55 pts	50 pts	60 pts
Programmatic Capability and Past Performance	35 pts	30 pts	30 pts
Total	**170 pts**	**160 pts**	**175 pts**

Criteria are further made up of sub-criteria

- **Provide the sub-criteria # in your application and follow it with a detailed response**

- Sub-criteria language and points may differ between grant types

Review your responses to the Ranking Criteria in Section IV. against the Evaluation Criteria in Section V.

EPA BROWNFIELDS AND LAND REVITALIZATION

1. Project Area Description & Plans for Revitalization – Overview

Here is:

- my community and the target area;

- the brownfield issues and their impacts on the community;

- how this grant fits into the community's revitalization plan;

- the anticipated outcomes and how the target area will benefit from revitalizing the brownfield sites; and

- the strategy to leverage resources to reuse the brownfield sites.

1. Project Area Description & Plans for Revitalization

Target Area and Brownfields

Background and Description of Target Area

- Provide cultural and industrial description of your community that demonstrates your brownfield challenges and their impact on the community.

- Describe the specific area (or areas) where work will be performed.

Clarity of the target area description will be scored

Multipurpose Grant projects may only have ONE target area

Depending upon the applicant, the community may be the city/town or other geographic area.
The target area is an area within that community.

1. Project Area Description & Plans for Revitalization

Target Area and Brownfields (cont'd)

Description of the Priority Brownfield Site(s)

- Identify and describe your brownfield sites.

    o **Multipurpose**: Describe the priority site(s) and discuss why the site is a candidate for assessment, cleanup and/or reuse.

    o **Assessment**: Describe the priority site(s); describe why it is a priority for assessment and redevelopment.

    o **Cleanup**: Describe the property(ies) targeted for cleanup.

- Describe past and current land uses, current site conditions (including structures), and potentially related environmental issues.

    o **Cleanup** and **Multipurpose**: Also describe the priority site's known contamination.

1. Project Area Description & Plans for Revitalization

Assessment and Cleanup Grant Applications Only

Revitalization of the Target Area

Reuse Strategy and Alignment with Revitalization Plans

- Describe:
  - The reuse strategy or projected reuse for the priority site(s).
  - How it aligns with government's land use and revitalization plans.

+Cleanup:

- If applicable, how the reuse takes into account that the priority site is in a federally designated flood plain.

- How public and project partners were involved in the development of the reuse strategy/projected reuse.

1. Project Area Description & Plans for Revitalization

Multipurpose Grant Applications Only

Revitalization of the Target Area

Overall Plan for Revitalization

Option 1: If an overall plan for revitalization <u>already exists</u>, discuss:

- How the proposed activities align with that plan.
- The extent to which a feasible site reuse strategy already exists for at least one of the priority sites.
- How the plan aligns with and supports the local government's broader land use and revitalization efforts.

Option 2: If an overall plan for revitalization <u>does not exist</u>, discuss:

- How the activities performed will result in an overall plan for revitalization of brownfield sites, including a feasible site reuse strategy for the priority site(s).
- How the plan will align with and support the local government's broader land use and revitalization efforts.

1. Project Area Description & Plans for Revitalization

Revitalization of the Target Area (cont'd)

Outcomes and Benefits of Reuse Strategy/Overall Plan for Revitalization

- Describe the potential of the project or revitalization plans to:
  - Stimulate economic development <u>and/or</u> facilitate non-economic benefits.
  - Help spur economic growth within an Opportunity Zone.
  - <u>If applicable</u>, promote the sustainable reuse of existing building structures.

- <u>If applicable</u>, describe how the redevelopment of the priority site will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.

If the priority/proposed site is not in an Opportunity Zone, will the outcome of this grant benefit an Opportunity Zone?

Click here for a factsheet on Renewable Energy and Energy–Efficient Approaches in Brownfield Redevelopment

Click here **for information on Opportunity Zones**

EPA BROWNFIELDS AND LAND REVITALIZATION

1. Project Area Description & Plans for Revitalization

Strategy for Leveraging Resources

Resources Needed for Site Reuse

- Describe:
  - your eligibility for monetary funding from other resources
  - key funding resources needed for environmental assessment or remediation, **and** subsequent reuse of the priority site(s)

- **+Cleanup**: Describe funding that has been secured and attach documentation that substantiates the commitment(s).

> **Do not duplicate sources discussed in 3.a., *Description of Tasks/Activities and Outputs* (all three grant types) and sources used to meet the cost share (MP and Cleanup).**

1. Project Area Description & Plans for Revitalization

Strategy for Leveraging Resources

Use of Existing Infrastructure

- Describe how this grant will facilitate the use of existing infrastructure at the priority site and/or within the target area.

- If additional infrastructure needs are key to the revitalization plans, describe the infrastructure needs and funding resources that will be sought to implement that work.

Infrastructure includes buildings, roads, and power supplies, transportation lines, etc.

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2. Community Need & Engagement – Overview

Here is:

– Why my small and/or low-income community is unable to fund brownfield activities.

– How this grant will help populations in the target area that have a high incidence of adverse health conditions and greater-than-normal incidence of diseases.

– How this grant will help populations in the target area that shares a higher burden of environmental justice.

– How the community will be involved.

– The plan for communicating project progress.

EPA BROWNFIELDS AND
LAND REVITALIZATION

2. Community Need & Engagement

Community Need

The Community's Need for Funding

- Describe why the small and/or low-income community is unable to secure funding for brownfield activities.

- Describe how this grant will meet the needs of the small and/or low-income community.

- *Assessment Coalitions*: Describe how funding will serve coalition members and communities that would otherwise not have access to resources to address brownfield sites.

2. Community Need & Engagement

Community Need (cont'd)

Threats to Sensitive Populations (in the target area)

- Identify children, pregnant women, minority or low-income communities, or other **sensitive populations**. Describe how this grant will address or facilitate the identification and reduction of threats to the health <u>or</u> welfare of such groups.

- Describe how this grant will address or facilitate the identification and reduction of threats to populations that suffer from **greater-than-normal incidence of diseases or conditions (including cancer, asthma, or birth defects)** that may be associated with the brownfield sites.

- Describe how this grant will address or facilitate the identification and reduction of threats to populations that have **environmental justice challenges** and/or **disproportionately share the negative environmental consequences** resulting from industrial, governmental, and/or commercial operations or policies.

2. Community Need & Engagement

Community Engagement

Project Involvement

- Identify the local organizations/entities/groups (i.e., project partners) that will be involved in the project.

Project Roles

- Discuss:
  - o the role each identified partner will play in the project
  - o how partners will be involved in making decisions with respect to site selection, cleanup, and future reuse of the brownfield sites.

Name of organization/entity/group	Point of contact (name, email & phone)	Specific involvement in the project or assistance provided
Add rows as needed		

The local project partners may include community organizations (e.g., neighborhood groups, citizen groups, business organizations, etc.), as well as property owners, lenders, developers, and the general public.

Involve different types of partners

Involve partners that are relevant to your project plans.

Do NOT include letters of support

2. Community Need & Engagement

Community Engagement (cont'd)

Incorporating Community Input

- Discuss plan for communicating progress to:
  - the local community
  - project partners
  - residents/groups in (or in close proximity to) the target area/site
- Include:
  - the frequency of communication
  - the communication method(s) (including methods that offer an alternative to in-person community engagement in the event of social distancing or other restrictions as a result of COVID-19)
  - how input will be solicited, considered, and responded to

Click here to view the factsheet on Socially Distant Engagement Ideas

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Wrap-up

3. Tasks, Costs, & Measuring Progress – Overview

Here is my step-by-step plan for implementing the brownfield project in the target area.

— What tasks need to be accomplished and when.

— Who's involved and who's the lead in implementing those tasks.

— How funding will be budgeted to pay for those tasks, and how we came up with those numbers.

— How we will track and measure the project progress and results.

3. Tasks, Costs, & Measuring Progress

- **All Grant Types**
  - *Local government applicants* may use up to 10% of the total grant award for health monitoring activities.
  - Administrative costs (direct costs and indirect costs) may not exceed 5% of the total requested EPA funds.

- **Multipurpose Grant Applications**
  - Projects will be reviewed more favorably when:
    - ❖ At least 70% of funds are allocated for tasks directly related to site-specific work, including site assessments, remediation, and associated tasks
    - ❖ At least $200,000 is allocated for tasks directly associated with site remediation.
  - $40,000 cost share.

- **Assessment Grant Applications**
  - Projects will be reviewed more favorably when at least 50% of funds are allocated for tasks directly associated with Phase I and Phase II environmental site assessments.
  - *Assessment Coalition applicants* – projects that assess a minimum of 5 sites and at least one site in each members' jurisdiction will be reviewed more favorably.

- **Cleanup Grant Applications**
  - 20% cost share.

3. Tasks, Costs, & Measuring Progress (Cleanup)

Proposed Cleanup Plan

- Outline the cleanup plan(s) proposed for the site(s).

- Briefly describe the contaminated media to be addressed, cleanup method(s) and disposal requirements.

> This description can use the same language as submitted in the draft Analysis of Brownfields Cleanup Alternatives (ABCA) attachment (or attachments if applying for multiple sites).

> Ensure the Cleanup Plan description is included in the narrative and not just in the attached draft ABCA(s).

EPA BROWNFIELDS AND LAND REVITALIZATION

3. Tasks, Costs, & Measuring Progress

> i.   Project Implementation
> ii.   Anticipated Project Schedule
> iii.   Task/Activity Lead
> iv.   Outputs

Description of Tasks/Activities and Outputs

Project Implementation

- Discuss major tasks/activities that will occur during the grant period.

- **Assessment:** If anticipated, discuss EPA-funded tasks/activities to occur beyond priority sites or outside target area(s).

- If applicable, identify tasks/activities that will be funded from other sources; such as in-kind resources or funding contributed by your organization.

> **Develop a list of the EPA-funded tasks/activities to implement the project.**

> **Group them logically into 4-5 major tasks (that will coincide with the project tasks in the budget table).**

> **Do not duplicate sources listed in 1.c.i. *Strategy for Leveraging Resources.***

EPA BROWNFIELDS AND LAND REVITALIZATION

3. Tasks, Costs, & Measuring Progress

Project Implementation (cont'd)

Typical eligible tasks/activities may include:

- <u>Program Management (all)</u> – procuring a Qualified Environmental Professional, EPA reporting, financial and records management, internal progress meetings, etc.

- <u>Assessment related</u> – inventory work, site selection, securing site access, community engagement, Phase I and Phase II investigations, cleanup and reuse planning for a specific site, coordinated planning around multiple brownfield sites, etc.

- <u>Assessment & MP</u> – develop an area-wide plan, conduct a market feasibility study, evaluate infrastructure needs, etc.

- <u>Cleanup related</u> – cleanup and reuse planning, community engagement, cleanup oversight, site cleanup, etc.

- <u>Health Monitoring</u> – coordination with the local health agency on health monitoring activities.

**Relate to target area/priority sites.
Establish time frame in schedule.**

3. Tasks, Costs, & Measuring Progress

Description of Tasks/Activities and Outputs (cont'd)

Anticipated Project Schedule

- Discuss the anticipated schedule and timing for the EPA-funded activities during the grant period.

Task/Activity Lead

- For each task, identify the lead entity overseeing the work.

- If an entity(ies) other than the applicant is the lead, explain why the lead entity(ies) (and not the applicant) is appropriate to oversee the activity(ies).

> **Remember, the local health agency must be involved in health monitoring activities.**
>
> **See review EPA's**
> Health Monitoring Fact Sheet
> **for more information.**

3. Tasks, Costs, & Measuring Progress

Description of Tasks/Activities and Outputs (cont'd)

Outputs

- Identify and quantify, as appropriate, the anticipated outputs/deliverables for each activity/task.

> **Outputs may include, but are not limited to quarterly reports, site inventories, environmental site assessment reports, site cleanup plans, planning activity deliverables, number of community meetings, community involvement plans, cleanup plans, and final ABCAs.**

Optional: use table to present responses

Task/Activity:
i. Project Implementation: ▪ Discussion of EPA-funded tasks/activities for the priority site(s):   ▪ Discussion of EPA-funded tasks/activities for non-priority site(s), if applicable: ▪ Non-EPA grant resources needed to carry out task/activity, if applicable:
ii. Anticipated Project Schedule:
iii. Task/Activity Lead:
iv. Output:

3. Tasks, Costs, & Measuring Progress

Cost Estimates

- Use the sample table format to develop and present a budget for the tasks/activities previously described.

  - **Only include EPA grant funds [and the required cost share]** → Leveraged resources should <u>not</u> be included in the budget table.

  - Do <u>not</u> distinguish between hazardous substances funds from petroleum funds.

  - If applicable for Cleanup Grants, distinguish requested funds for each site.

- Describe how cost estimates for <u>each</u> task were developed (per budget category).

  - **MP/Cleanup**: Describe how the cost share was developed.

  - Where appropriate, present costs per unit.

3. Tasks, Costs, & Measuring Progress

Cost Estimates (cont'd)

Take note of the evaluation criteria in Section V.

Development of Cost Estimates
The degree of clarity on how <u>each</u> cost was developed and the extent to which costs per unit are presented in detail.

Application of Cost Estimates
The extent to which each proposed cost is reasonable and realistic to implement the project and clearly correlates with the proposed tasks/activities.

Funds Allocated Toward Environmental Site Assessments (Assessment only)
The degree to which grant funds are allocated for tasks/activities directly associated with Phase I and Phase II environmental site assessments.

Funds Allocated Toward Site-specific Work (MP only)
The degree to which grant funds are allocated for tasks/activities directly associated with site-specific work, including site assessments, remediation, and associated tasks.

Eligibility of Cost Share Activities (MP and Cleanup)
The extent to which the entire cost share will be met with eligible activities.

EPA BROWNFIELDS AND LAND REVITALIZATION

Cost Estimates – EXAMPLES

- **Prog. Mngmt/Personnel:** $24,000 - 480 hrs. Planner/Finance avg rate - $50/hr (per quarter est: 10-hrs EPA reporting/records management, 10-hrs. Monthly progress meetings, and 20-hrs site-specific and community engagement work). Additional hours required will not be charged to the grant.

- **Travel:** 2 people to attend Nat'l Brownfield Conference: $3,600 (per person: $500 airfare, 4 nights hotel $800, 4 days per diem and incidentals $500)

- **Cleanup Cost Share:** Providing clean fill $7,100 (est. 500 cu. yd. fill @ $10/cu.yd. = $5,000; three 8-hr days DPW equipment operator @ $25/hr= $600; 1-week front loader rental @ $1,500/week); etc.

- **Site-Specific Cleanup Planning:** $10,000 (finalize ABCA $1,000, prepare Remedial Action Plan $5,000, stormwater management design plans $3,000, State fee for entering VCP $1,000)

EPA BROWNFIELDS AND LAND REVITALIZATION

Assessment Grant Application Budget – EXAMPLE

Budget Categories	Project Tasks					
(programmatic costs only)	Program Management	Community Outreach	Phase I	Phase II	Cleanup Planning	Total
Personnel	$25,000	$15,000				**$40,000**
Fringe Benefits						
Travel	$6,000					**$6,000**
Equipment						
Supplies						
Contractual		$15,000	$40,000	$165,000	$30,000	**$250,000**
Other (specify)						
Total Direct	**$31,000**	**$30,000**	**$40,000**	**$165,000**	**$30,000**	**$296,000**
Total Indirect	**$2,500**	**$1,500**	**$0**	**$0**	**$0**	**$4,000**
Total Federal (Direct + Indirect)	**$33,500**	**$31,500**	**$40,000**	**$165,000**	**$30,000**	**$300,000**

Label Tasks

Should match SF-424 and SF-424A

Includes the up to 5% for administrative costs

Can charge up to 5% of the amount requested from EPA funds for administrative costs (direct costs for grant administration + indirect costs).

Costs must be classified as direct or indirect consistently and may not classify the same cost in both categories.

EPA BROWNFIELDS AND LAND REVITALIZATION

Cleanup Grant Application Budget – EXAMPLE

Budget Categories	Project Tasks				
(programmatic costs only)	Program Management	Community Outreach	Cleanup Oversight	Cleanup	**Total**
Personnel	$20,000	$5,000			**$25,000**
Fringe Benefits					
Travel					
Equipment					
Supplies	$5,000				**$5,000**
Contractual		$5,000	$15,000	$450,000	**$470,000**
Other (specify)					
Total Direct	**$25,000**	**$10,000**	**$15,000**	**$450,000**	**$500,000**
Total Indirect	**$0**	**$0**	**$0**	**$0**	**$0**
Total Federal (Direct + Indirect)	**$25,000**	**$10,000**	**$15,000**	**$450,000**	**$500,000**
Cost Share	$10,000	$10,000	$0	$80,000	$100,000
Total Budget	**$35,000**	**$20,000**	**$15,000**	**$530,000**	**$600,000**

Cost Share

Describe only eligible cost share activities

Don't exceed the required cost share

EPA BROWNFIELDS AND LAND REVITALIZATION

Multipurpose Grant Application Budget – EXAMPLE

Separate assessment, cleanup and planning activities

Budget Categories	Project Tasks				
(programmatic costs only)	Program Management	Community Outreach	Assessment	Cleanup	Total
Personnel	$35,000	$5,000			**$40,000**
Fringe Benefits					
Travel					
Equipment					
Supplies	$10,000				**$10,000**
Contractual		$10,000	$240,000	$500,000	**$750,000**
Other (specify)					
Total Direct	**$45,000**	**$15,000**	**$240,000**	**$500,000**	**$800,000**
Total Indirect	**$0**	**$0**	**$0**	**$0**	**$0**
Total Federal (Direct + Indirect)	**$45,000**	**$15,000**	**$240,000**	**$500,000**	**$800,000**
Cost Share	$10,000	$0	$0	$30,000	$40,000
Total Budget	**$55,000**	**$15,000**	**$240,000**	**$530,000**	**$840,000**

Cost Share

Describe only eligible cost share activities

Don't exceed the required cost share

EPA BROWNFIELDS AND LAND REVITALIZATION

3. Tasks, Costs, & Measuring Progress

Measuring Environmental Results: Anticipated Outputs/Outcomes

- Discuss your plan to track, measure, and evaluate progress in achieving project outputs, overall project results, and eventual project outcomes.

Tracking tools to consider

- Software products
- Progress reporting
- Scheduled team progress meetings
- Contractor support

Tracking your accomplishments - the big picture

- Status on leveraging other critical funding
- Strides toward accomplishing redevelopment vision plans

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Wrap-up

4. Programmatic Capability & Past Performance – Overview

Applicants should:

- Demonstrate ability to successfully manage the grant and produce the measurable results discussed in the application.

- Describe the organizational structure and key staff.

- Highlight past performance on Brownfield Grants, federal or non-federal grants.

Adhere to the total page limits:
10 pages for Assessment and Cleanup Grant applications
12 pages for MP Grant applications

4. Programmatic Capability & Past Performance

Programmatic Capability

Organizational Structure

- Explain how your team will be structured to ensure the grant will be carried out successfully.

- **Assessment Coalitions**: Describe the proposed governance/decision-making structure among your coalition members.

- **Multipurpose**: Describe experience working with the local community to successfully assess, cleanup and reuse sites.

Description of Key Staff

- Discuss key staff that will work together to successfully implement the grant.

Acquiring Additional Resources

- Discuss the systems in place to acquire any additional expertise and resources.

4. Programmatic Capability & Past Performance

Past Performance & Accomplishments

Three categories from which to choose:

Applicants who currently have/previously received a Brownfields Grant

– OR –

Applicants who have not received a Brownfields Grant but have received other federal/non-federal assistance agreements

– OR –

Applicants who have never received federal or non-federal assistance agreements

4. Programmatic Capability & Past Performance

Accomplishments & Compliance with Grant Requirements

Past/present Brownfield Grant recipients

BF Grants to Include	BF Grants/Resources to Exclude
• Multipurpose Grants • Assessment Grants • RLF Grants • Cleanup Grants • 128(a) Grants	• Area-wide Planning Grants • Environmental Workforce Development & Job Training Grants • Activities conducted under a Targeted Brownfield Assessment • Subawards issued from a Brownfields Grant

- Describe (for no more than three recent grants):
    - Accomplishments (specific outputs and outcomes)
    - Compliance with the workplan, schedule, and terms and conditions
    - History of timely and acceptable reporting of deliverables, including **ACRES!!**
    - Corrective action for past grant management issues (on any grant)
    - Plans to expend all remaining funds in open grants/explanation of why there were leftover funds on closed grants

4. Programmatic Capability & Past Performance

Purpose and Accomplishments & Compliance with Grant Requirements

Applicants who are not past/present Brownfield Grant recipients, but have received other federal or non-federal assistance agreements

- Describe (for no more than three recent/relevant/similar grants):
  - The awarding agency/organization, amount and purpose of funding
  - Accomplishments (specific outputs and outcomes)
  - Compliance with the workplan, schedule, and terms and conditions
  - History of timely and acceptable reporting
  - Corrective action for past grant management issues

EPA BROWNFIELDS AND LAND REVITALIZATION

4. Programmatic Capability & Past Performance

<u>Affirmative Statement of Not Receiving Assistance Agreements</u>

Applicants who have never received federal or non-federal assistance agreements

- Affirm that your organization has never received any type of federal or non-federal assistance agreements

- Will receive a neutral score

Respond to the correct
Past Performance & Accomplishments
criterion

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NEXT: Wrap-up

Regional Brownfield Contacts

Contacts are listed in Section VII. of the Guidelines

Updated!

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