

On September 14<sup>th</sup>, 2020, EPA's Office of Brownfields & Land Revitalization held a webinar to assist applicants with preparing the Fiscal Year 2021 Multipurpose, Assessment, and Cleanup Grant applications. Below is a transcript of questions submitted by participants and EPA's response. Additional guidance provided after the webinar is written in green font.

The recorded webinar is available at <https://epawebconferencing.acms.com/pjtlwlf4abks/>.

If you have general questions about EPA's Brownfields Program or questions about a specific site for which you're seeking funding, please contact your Regional Brownfields Contact listed in Section VII. of the Guidelines. If you have questions on how to submit an application through [www.grants.gov](http://www.grants.gov), please visit the "APPLICANTS" tab on the grants.gov website for information.

GENERAL QUESTIONS & ANSWERS	
Q: Would environmental insurance costs be an eligible cost that could be covered by awarded grant funds?	A: Yes, depending on the specific insurance project. Please see <a href="#">FAQs F.6. and F.7.</a> for additional information.
Q: For the Multipurpose Grant, awards are limited to 10 nationally, not 10 per region, correct?	A: Correct, EPA intends to award 10 Multipurpose Grants nationally.
Q: For the assessment and cleanup grants, is an applicant restricted from applying this year if one or both were awarded to the same applicant last year?	A: For Assessment Grants, here is the language in the guidelines: "Current EPA Brownfields Assessment Grant recipients must demonstrate that payment has been received from EPA (also known as 'drawn down') for at least 70% of each Assessment cooperative agreement they have with EPA by October 1, 2020, in order to apply for additional Assessment Grant funding under this solicitation." (p.15)  For Cleanup Grants, applicants may not apply for funding for a site that was previously remediated with a Cleanup Grant.
Q: For the Community wide Assessment can you explain what the definition of a community is?	A: "Community-wide" for community-wide and coalition assessment grants, just means that the applicant plans to expend funds on more than one brownfield within the areas that they define as target areas within their application. Please see <a href="#">Section I.A. of the Assessment Guidelines</a> for additional information.
Q: I thought the SF-424 was not required for the application. Please clarify.	A: The SF-424 and SF-424A are required. The SF-424B is no longer required.

## Procurement and Subawards

Q: On contractor selection and mentioning in applications: can existing who were selected using federal procurement procedures who are currently performing the same scope of work as is being proposed, be listed as a 'pre-selected' contractor and continue work under a new Brownfields grant., should the application be selected? Thanks

A: Yes, provided the procurement process is not too "stale." EPA considers procurements conducted within 5 years to be current. Please refer to page 12 of [EPA's Procurement Best Practices Guide](#).

Q: Do we need to issue an RFP to post the potential assessment or cleanup and have that ready for the grant application?

A: If you mean a request for bids from contractors that would work on the grant(s) should you receive them...you can post that AFTER you get the grant, if you were to be awarded. You can also request bids from contractors prior to submission of the grant application. The RFP should indicate that the contract is contingent on your organization receiving a grant from EPA. This approach allows you to include the selected contractor's qualifications in your application.

Q: I have a question about naming contractors as partners in the application. If you have more than one consultant does each one need to follow the Procurement Standard? And do we have to name the consultant as a "partner" in the application?

A: To question 1 - Yes unless your organization has an agreement with a state that allows local governments to use consultants who are under contract with the state. On question 2 - EPA does not require applicants to name consultants as partners in their application.

## THRESHOLD CRITERIA QUESTIONS AND ANSWERS GENERAL QUESTIONS & ANSWERS

### General

Q: Is there a pre-application?

A: **No. There is no pre-application or separate screening process.** All of the application materials are due on October 28, 2020.

Q: Are Alaska native corporations that are for-profit eligible for funding?

A: AK Native Corporation per ANCSA are eligible. You can find it in the Eligibility Information and Threshold Criteria section of each of the guidelines.

Q: Are school districts considered eligible?

A: School districts are eligible so long as they are considered Units of Local Government **as provided in 2 CFR 200.64.**

Q: Are public community colleges eligible to apply as the lead?

A: **Yes, community colleges may be eligible as the lead applicant on an assessment coalition application as long as they are either a government entity created by the state legislature or**

have tax exempt status under section 501(c)(3) of the Internal Revenue Code . Please confirm with your Regional Brownfield Contact.

Q: Can sites be privately owned for assessment or cleanup grants?

A: Sites may be privately owned for Assessment Grants (where an eligible entity that receives that grant conducts the assessment on the private owner's behalf.) Site may not be privately owned for Cleanup Grants.

### Assessment Grants

Q: No match is required for assessment only grants, correct?

A: Correct. Assessment Grants do not require a cost share.

Q: For Community wide assessment applications, are there specific ownership requirements? If we are applying as a city do we have to own the sites we are writing about?

A: You do not need to own the properties you are writing about, but you have to be sure that you can get an access agreement(s) signed to be able to assess the priority site(s) you are discussing. EPA does not require the access agreements to already be completed or in progress before applying. However, you may choose to discuss your plan to gain site access for sites the city doesn't own within the narrative.

Q: Are ASTM E1903-19 required for community wide assessments grant applications?

A: No, the ASTM Phase II Environmental Site Assessment requirement only applies to Cleanup Grants.

### 70% Drawdown Requirement for Assessment Grants

Do not draw down funds unless you have incurred allowable costs that need to be paid. Under the terms of EPA agreements, recipients must disburse substantially all of the amount drawn down within 5 business days.

Q: Coalition members (not the lead member) do not have to demonstrate payment of 70% draw down of funds for assessment grants if they have been awarded Assessment Grants in the last few years?

A: If the member does not have their own existing Assessment Grant, the 70% drawdown does not apply to them.

Q: If we currently have an Assessment Grant and have not yet spent down 70%, can we join a new coalition as a member?

A: This approach is allowable, however, the application would not score as favorable per the evaluation criteria on page 43 of the guidelines: 2.a.i. The Community's Need for Funding: "Additionally for Assessment Coalition applicants, the extent to which this funding will serve coalition members and communities that would otherwise not have access to resources to address brownfield sites."

Q: Existing Assessment Grants in the amount of \$400,000 are divided evenly between petroleum and hazardous substances. Is the demonstration of 70% drawdown to be shown per the full grant award or per petro/haz?

A: The 70% drawdown is for the total of the grant (\$400,000).

Q: Does the 70% drawdown apply to multipurpose applications or is it for assessment only?

A: The 70% drawdown applies to Assessment Grants only.

### Assessment Coalitions

Q: Can two state agencies be part of a coalition grant?

A: Generally, no since coalition members may not have the same geographic jurisdiction and must be separate legal entities. *There may, however, be unique situations under state law in which the two state agencies have different geographic jurisdictions and are legally separate. Please contact your Region if you believe that your situation is unique.*

Q: Are Economic Development Authorities (Virginia) eligible to apply as the lead?

A: Yes - any eligible entities as listed in Section III.A. of the guidelines may apply as a lead.

### Cleanup Grants

Q: For Clean Up Grants, does Community Notification require holding a meeting? Would it be possible to use virtual tools to gather public input instead of hosting a meeting?

A: Yes, a 'meeting' is required to meet the Community Notification requirement. And yes, you may use virtual tools. Please refer to [Frequently Asked Question K.13](#).

Q: Do we need to demonstrate that the property owned by the grantee was obtained using All Appropriate Inquiries requirements?

A: If the applicant plan to qualifies as a bona fide prospective purchaser, then yes. The applicant will need to discuss how the property was acquired and what pre-purchase investigations were conducted. *Please review the site-specific threshold criteria in Section III. of the Guidelines.*

### Multipurpose Grants

Q: Is there a cost-share waiver available for the multi-purpose grant?

A: No, applicants cannot request a waiver for the Multipurpose Grant cost share. All applicants must discuss how they will meet the \$40,000 cost share.

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

Q: Can you define "sustainable reuse" in terms of buildings on the property?

A: EPA does not have a set definition of "sustainable reuse", but consider how you can use existing buildings in a way to promotes sustainability. The EPA's new factsheet may provide

guidance that is helpful/relevant to your project: <https://www.epa.gov/brownfields/are-you-considering-renewable-energy-or-energy-efficient-approaches-your-brownfields>

Q: For slide 47 is it correct that the speaker indicated that it must explain the reuse strategy and how it aligns with federal revitalization plans--the emphasis being on federal. Is that correct or is it to be demonstrated to align with local plans?

A: Applicants should demonstrate that their plans align with LOCAL GOVERNMENT PLANS. Sorry for the confusion.

Q: What if the local governmental body does NOT have a revitalization plan or strategy in place?

A: Please do your best to address the criterion. Discuss any efforts made that will result in a revitalization plan and/or reuse strategy.

#### COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS & ANSWERS

Q: Is EPA looking for data demonstrating how COVID-19 has impacted local businesses and residents in the Community Need section?

A: The guidelines simply state: EPA is not looking specifically for COVID-19 related impacts, but if that's one of the issues that is factored into the community's need, then it can be discussed.

The evaluation criterion reads: "The extent to which this grant will meet the needs of the community that has an inability to draw on other initial sources of funding to carry out environmental assessment or remediation, and subsequent reuse in the target area(s) because of the small population and/or low income of the community.

Additionally, for Assessment Coalition applicants, the extent to which this funding will serve coalition members and communities that would otherwise not have access to resources to address brownfield sites."

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

Q: Could a Vision to Action workshop be included in a multi-purpose grant?

A: Please review the list of eligible Planning activities under the Multipurpose Program: <https://www.epa.gov/brownfields/information-eligible-planning-activities>

Q: In what section of the application would you discuss eligible planning activities? Does this just need to be noted in the Tasks/Activities section or does it need to be described in multiple sections?

A: It should be discussed in your Description of Tasks/Activities and Outputs criterion. However, you may decide to include relevant information in responses to other sections as needed.

Q: If a task such as grant outreach or grant reporting will be covered by other funding, should it still be included in the task description and budget table (with \$0) as they are necessary for the project implementation? Do they need to be included in the task description table or can they be summarized in a paragraph?

A: In-kind resources should be discussed under Project Implementation. The budget table and cost estimates should only relate to the work funded by the EPA grant (and the cost share for Cleanup and Multipurpose grant applications).

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

Q: The Compliance with Grant Requirements section (4.ii.b.2.) is worth 10 points now. What type of information are you looking for?

A: EPA is asking applicants to provide the same information as in previous years. The criterion is now broken into two subcriteria - each worth 5 points.

Q: Can the past performance be on EPA Brownfields Job Training grant?

A: Please see slide 77 (in the presentation). Job Training Grants do NOT count toward past/performance for current/past brownfield grants. Therefore, please respond to criterion 4.b.ii. "Has Not Received an EPA Brownfields Grant, but has Received Other Federal or Non-Federal Assistance Agreements."

Q: Do TRP grants be used as former Brownfield grants or just grants that were addressed in this presentation?

A: Please see slide 77 (in the presentation) for a list of grants that are considered Brownfield Grants. [These include, EPA Brownfields Multipurpose, Assessment, Cleanup, Revolving Loan Fund Grant, and/or 128(a) Grant.]

Q: If an applicant has 3 or more previous grants, are they required to describe 3 grants or can they only note 1 or 2 most relevant grants (given space limitations)?

A: Please try to include the three if the description fits within the page limit. If you're unable to describe your three most recent grants, consider what information would be most relevant and responsive to the criterion.