



# **EPA Brownfields Grant Guidelines A National Q&A**

## **Understanding the Proposal Guidelines**

October 16, 2008

Presented by:

The Office of Brownfields & Land Revitalization  
US EPA HQ, Washington, DC



## EPA Speakers

### Moderator

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(located in Appendix 1)

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## Agenda

- Brownfields Overview
- Types and Amounts of EPA Brownfields Grants
- Brownfields Competitive Grant Process
- Overview of Threshold Criteria
- Overview of Ranking Criteria
- Useful Application Preparation Tips
- Additional Resources
- Questions!

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## Brownfields Mission

- EPA's Brownfields Program is designed to empower states, communities, and other stakeholders in economic redevelopment to work together in a timely manner to prevent, assess, safely clean up, and sustainably reuse brownfields. The Program provides financial and technical assistance for brownfield revitalization, including grants for:
  - Assessment
  - Cleanup
  - Revolving Loan Fund

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## Types and Amounts of EPA Brownfields Grants





## Brownfields Competitive Grant Program

*EPA Brownfields ARC grants are very competitive. Applicants should be prepared to put time and effort into constructing a winning proposal.*

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## FY2008 Brownfields ARC Grant Program

- EPA received 845 proposals
- Selected 314 grants nationally (\$74 million)
  - 194 assessment grants
  - 108 cleanup grants
  - 12 RLF grants

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## FY2009 Application Timeline

- November 14, 2008 – Proposal Submission Deadline
- Spring 2009\* – Approx. \$72 million awarded nationwide

*\*tentative*

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## Brownfields ARC Grants – Getting Started

- FY2009 Proposal Guidelines for ARC Grants are at:  
[www.epa.gov/brownfields](http://www.epa.gov/brownfields)  
or  
[www.grants.gov](http://www.grants.gov)
- ❖ This Q&A session is *NO SUBSTITUTE* for reading and closely following the detailed Guidelines!

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## Assessment Grant Program

Assessment grants can be used to inventory, characterize, assess, and conduct planning and community involvement related to brownfield sites.

**Community-wide** Up to \$200,000 for hazardous substance (including asbestos, lead paint, other environmental hazards, or up to \$200,000 for petroleum).

- Applicant can apply in **ONE community-wide assessment proposal** for \$200k Hazardous Substance and \$200k Petroleum, for a combined total of \$400k.

**Site-specific** (single site) Up to \$350,000 for one eligible site.

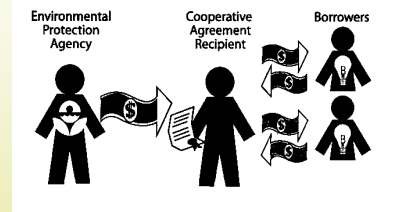
**Assessment Coalition Grants** Up to \$1 million for hazardous substance and/or petroleum (e.g. \$500k hazardous, \$500k petroleum) for 3 or more eligible entities. Must assess a minimum of 5 sites! Coalition members are not eligible to apply for individual Community-wide or Site-specific Assessment grants in the year they apply as part of a coalition.

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## Revolving Loan Fund Grant Program

- To make low interest loans (or subgrants) to carryout cleanup activities at brownfields properties.
- Up to \$1M per eligible entity
- Coalitions may apply
- (Minimum) 60% loans
- (Maximum) 40%-cleanup subgrants
- Cost share requirement of 20%



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- An eligible entity can apply for up to \$1M for a RLF grant. This grant is a three tier process, the funds flow from EPA-Grant Recipient-Loan Recipient. These funds are generally used to provide no-interest or low interest loans to Site Owners, Developers and others; including non-profit organizations
- Up to 40% can be used for RLF Cleanup subgrants and 60% or more to capitalize a RLF
- With RLF grants, there is a 20% match share requirement, unless a hardship waiver is granted (Can be in the form of a contribution of labor, money, labor, material or services as well as fees from loan recipients)
- Grant funds can be use to purchase insurance



## Cleanup Grant Program

- To carry out cleanup activities at brownfield sites
- Up to \$200K per property
- Hazardous substances or petroleum contamination
- May apply for up to 3 properties: Separate proposals for each property
- Applicant applying for both hazardous substance and petroleum cleanup grant funding at the same site must submit ONE proposal, which cannot exceed \$200,000
- Non-profits may apply
- Cost share requirement of 20%
- Community Notification (Threshold Criteria Only)
- *Must have FEE SIMPLE TITLE* by June 30, 2009

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## Overview of ARC Threshold Criteria





## Threshold Criteria – Must Pass

- **Applicant Responses to Threshold Criteria**
  - Regional Review
    - Pass/Fail
    - Must Pass All
    - Failure Means- the proposal will not be entered in the national competition

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## Applicant Eligibility (ARC Applicants)

- All applicants must describe how they are an eligible entity in order to receive an ARC grant(s).
- Eligible entities are:
  - General Purpose Unit of Local Government (as defined under 40 CFR Part 31)
  - States and Tribes
  - Quasi-government entities (e.g., regional councils, redevelopment authorities, economic development agencies, etc.)
  - **501(c)(3) Non-profits (Cleanup Grants Only)**

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## Applicant Eligibility (*con't*) (RLF/Assessment Applicants Only)

### Coalition Applicants

- Three or More Coalition Members (Assessment Only);  
Two or More Coalition Members (RLF only)

- All Separate Legal Entities
- All Eligible Applicants

Include in proposal:

- Documentation that all members are eligible entities
- Coalition Members' Letters agreeing to be part of Coalition





## Letter from State or Tribal Environmental Authority (ARC Applicants)

- Provide a *current* letter from the state or tribal\* environmental authority acknowledging that the applicant plans to conduct or oversee assessment and/or cleanup activities and to apply for grant funds.
- If you are applying for multiple types of grant program activities, you need to submit only one letter acknowledging the relevant grant activities. *However, you must provide the letter as an attachment to EACH proposal.*
- Provide your state/tribal environmental authority sufficient notice.

*\*Except for State or Tribal Environmental Authority*

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## Site and Property Ownership Eligibility (Site-Specific Assessment and Cleanup Applicants Only)

- The Brownfields Law prohibits EPA from providing grant funds to an entity that is considered potentially liable under CERCLA Section 107.
- CERCLA contains very broad liability provisions.
- Liability for site owners is highly dependent on *HOW* and *WHEN* the site was acquired.
- Therefore, site eligibility is dependent on *HOW* and *WHEN* the site was acquired.
- **Work w/ your EPA Brownfields Coordinator now to settle site eligibility questions!**

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## Site and Property Ownership Eligibility (Site-Specific Assessment and Cleanup Applicants Only) (con't)

### Sites That Are *NOT* Eligible

- Property on, or proposed for listing on, the National Priorities List
- Property subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees
- Property subject to the jurisdiction, custody, or control of the U.S. government\*

*\*Lands held in Trust by the U.S. Government  
are generally eligible for funding*

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## Site and Property Ownership Eligibility (Site-Specific Assessment and Cleanup Applicants Only) (con't)

- **Hazardous Sites**
    - EPA Is Decision Maker
    - Applicant Can Not Be Potentially Liable (CERLCA)
  
  - **Petroleum Sites**
    - State Is Decision Maker (**Except for Tribes**) (*if state is unwilling or unable EPA will make the determination*)
    - State Petroleum Eligibility Letter
      - Request Early
      - Unique From State Acknowledgement Letter
      - Proposal Attachment
- \* Petroleum site applicants must provide answers to the petroleum threshold questions to the appropriate state contact in sufficient time for them to make an eligibility determination.*

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## Site and Property Ownership Eligibility *(con't)* (Cleanup Applicants Only)

- Requires an AAI compliant Phase I is complete.
- Requires an ASTM E1903-97 or equivalent Phase II site assessment report completed prior to proposal submission in order to best describe cleanup plan and estimated costs.
- Be sure to respond to all threshold criteria for Hazardous Substances and Petroleum! (Petroleum also requires Phase I & II complete!)

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## Community Notification (Cleanup Applicants Only)

- Cleanup Applicants Only must provide the community with notice of its intent to apply for an EPA brownfields grant and an opportunity to submit comments by:
  - ✓ Placing an ad (or equivalent) in your local newspaper that covers the area targeted by your proposal **at least two weeks prior to the submittal date.**
  - ✓ Clearly communicating that a copy of the grant proposal is available for public review by indicating in your ad where the draft proposal is located (e.g. town hall library, website).

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## Community Notification (Cleanup Applicants Only) *(con't)*

- ✓ Indicating that you will accept comments on the draft proposal.
- ✓ Stating the date and time of a public meeting that you must hold prior to proposal submission.
- ❖ Applicants who are submitting more than one proposal may plan to have a single community notification ad and meeting. However, all targeted communities must receive the notification and be provided an opportunity to comment on the proposal(s) relevant to their community.

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## Overview of ARC Ranking Criteria







## Ranking Criteria

- Proposal must have passed the “Threshold Criteria” to be “Ranked.”
- 4 Ranking Criteria Sections for ARC Applicants:
  1. Community Need
  2. Project Description and Feasibility of Success
  3. Community Engagement and Partnerships
  4. Project Benefits

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## Ranking Criteria *(con't)*

- Each criterion is made up of Sub-criteria.
  - Answer each individually!
  - Sub-criteria may be the same or different per Ranking Criterion per Grant Type!
- Total possible points for each grant type is 100.



## 1. Community Need (ARC Applicants)

- Community Need - Under this criterion, ARC proposals will be evaluated on:
  - Applicant's description of the health, welfare, environmental, *and*
  - Financial needs of the targeted community as it is affected by the presence of brownfields.
- ❖ *Responses should clearly identify the sources of information used in this section.*

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Health, Welfare, and Environment *Provide information on the number and size of the brownfields and the health, welfare, and environmental impacts of these sites in your targeted community.*

Brownfields Effect On Target Community

Type, Number, Size, Location Of Sites

Typical Contamination

Sensitive Population In Community

For example: minorities, children, and women of child-bearing age

Financial- Provide factors explaining why other financial resources are Not available for assessment of brownfields



## 2. Project Description/Feasibility of Success (ARC Applicants)

- Project Description and Feasibility of Success - Under this criterion, proposals will be evaluated on Applicant's ability to Demonstrate:
  - Reasonable approach to the project;
  - Sufficient resources to complete the project, and
  - Capability to complete the project in a timely manner.



## 2. Project Description/Feasibility of Success (ARC Applicants) (con't)

- *ALL ARC Applicants must describe the project they are proposing to be funded.*
- For Cleanup Proposals, Also Describe
  - *Proposed Cleanup Plan*
  - Institutional and/or Engineering Controls, and
  - Site Reuse Plans

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## 2. Project Description/Feasibility of Success (RLF Applicants Only) *(con't)*

- For RLF Proposals, Describe
  - Your **brownfields redevelopment program** and how the requested RLF grant funding will be used to support that program
  - Fund Sustainability Plan
  - Expected Borrowers & Subgrantees
  - Marketing Plan For Customers & RLF Program
  - Plan For RLF Success
    - For Example: Staff or Program Manager Commitment, Entire Team, Organization, Customer Selection, Lending Practices, Protective Cleanups

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## 2. Project Description/Feasibility of Success (ARC Applicants) (con't)

### **Budget**

- Table (**Sample Format for Budget**)
- Narrative
  - Describe Each Task (Please No Acronyms e.g. ESA - spell it all out)
  - Give outputs (e.g., 5 Ph I, 2 Ph II) and associated costs where possible
- Know Cost Eligibility (**Administrative Cost Ban**, Purpose Of Grant)
  - Administrative costs are prohibited. Programmatic costs are allowable.
  - It is always useful to explain and justify equipment and/or supply budget items. Equipment is generally expected for cleanup applicants only.
- 10% Health Monitoring for Local Gov't

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## 2. Project Description/Feasibility of Success (ARC Applicants) (con't)

**Programmatic Capability** – All ARC Applicants must **clearly** demonstrate your ability to manage a grant and oversee the work (i.e. demonstrate sufficient resources to complete the project and a capability to complete the project in a timely manner).

- **Prior** and Current Brownfields Grantee/Other assistance agreements recipients
  - Past Grant(s) Management & Performance
    - Funding Expenditure, Compliance, Accomplishments
    - Adverse Audit Findings
    - Corrective Action For Past Grant Management Issue

\* An applicant with no history of funding will be given a neutral score.

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### 3. Community Engagement and Partnerships (ARC Applicants)

**Community Engagement and Partnerships** - Under this criterion, proposals will be evaluated on:

- Applicant's plan for engaging the targeted community in the project to be funded under this grant;
- Extent to which the applicant has identified and established relationships with the partners necessary to achieve the project's goals; and
- Extent to which the support letters provided by community-based organizations involved with the project demonstrate specific and valuable commitments to the project.

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### 3. Community Engagement and Partnerships (ARC Applicants) (con't)

**Community-based Organizations** - Provide a **description of, and role of, the key** community-based organizations involved in your project.

- Support Letter From EACH Organization
  - Proposal Attachment
  - Must Describe Role
  - Must Describe Commitments
- Community-based organizations are NOT your congress persons or other elected officials. It is NOT the Mayor's office.
- Support Letters **Required**

\*EPA will focus on the unique contributions and strength of partnerships, instead of the sheer number of letters an applicant submits.

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## 4. Project Benefits (ARC Applicants)

**Project Benefits** - Under this criterion, proposals will be evaluated on the extent to which your project's anticipated outcomes:

- Promote general welfare through the improvement of the public health and safety, economy, and environment of the targeted community; **and**
  - Contribute to your overall community "vision" for the revitalization of brownfield sites.
- ❖ Consideration will be given to how public health issues are addressed during the project, the anticipated benefits of redevelopment, and the incorporation of sustainable practices .

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## Useful Application Preparation Tips





## Encouraging Good Basic Proposal Prep

- Read entire *NEW* Guidelines and follow directions.
- Get mentoring from prior grantees (listed @ [www.epa.gov/brownfields/bfwhere.htm](http://www.epa.gov/brownfields/bfwhere.htm))
- Write as though the reader knows NOTHING about your community.
- Address *all* criteria!
- Use the Proposal *Check Lists* at the end of the Ranking Criteria section.
- Avoid using acronyms and technical/organizational jargon

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## Encourage Good Basic Proposal Prep *(con't)*

- Use “white space” and obey 18 page limits (not including the 2-page cover letter)!
- There is a 2 page cover letter limit.
- Total proposal pages may not exceed 20 (18 page narrative; 2 page cover letter). *Attachments are not included in page limits!*
- 1” margins; 12 pt font; no binders; no color
- Limit attachments to required and relevant documents and letters.
- Avoid maps and photos- these and any other unneeded attachments will not be reviewed.

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## Encourage Good Basic Proposal Prep *(con't)*

- Contact State/Tribe/EPA with eligibility questions **early**.
- Contact partners for assistance in preparing and/or reviewing your proposal!
- Contact State if applying for petroleum to get the determination letter.
- Set up public meeting and get meaningful public input.

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## Additional Resources and Final Questions







## Web-Based Resources

- **FY09 ARC Proposal Guidelines**  
<http://www.epa.gov/brownfields/>
- **PLEASE CAREFULLY REVIEW: FY09 ARC Frequently Asked Questions (FAQs) -**  
<http://www.epa.gov/brownfields/publications/fy2009faqs.pdf>
- **Fact sheet on Brownfield Assessment Coalitions –**  
[http://www.epa.gov/brownfields/publications/acfs\\_062408.pdf](http://www.epa.gov/brownfields/publications/acfs_062408.pdf)

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# Questions?





## Thank You

After viewing the links to additional resources,  
please complete our online feedback form.

**Thank You**

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