

On September 29, 2022, EPA's Office of Brownfields & Land Revitalization held a webinar to assist applicants with preparing applications for the Fiscal Year 2023 **Community-wide Assessment Grants, Assessment Coalition Grants, Community-wide Assessment Grants for States and Tribes, and Multipurpose Grants**. Below is a transcript of questions submitted by participants and EPA's response. Responses below may include additional information than what was provided during the webinar.

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, please visit the "APPLICANTS" tab on the grants.gov website for information.

GENERAL QUESTIONS & ANSWERS

Q: Are bullet points acceptable for the narrative?

A: The only formatting requirements are that all application materials must be in English, the Narrative Information Sheet and the Narrative must be typed, single-spaced, on letter-sized (8.5 x 11-inch) paper, and should use standard Times New Roman, Arial, or Calibri fonts with a 12-point font size. EPA encourages applicants to carefully consider and accurately respond to all criteria.

Q: Do EPA Technical Assistance to Brownfields Communities (TAB) providers charge for their services?

A: No, TAB providers' services are all free. The TAB Program is funded by EPA and available to all stakeholders. Visit EPA's [Brownfields Technical Assistance, Training and Research webpage](#) to find your Region's TAB provider and contact information.

Q: Does a Tribe need to have a Section 128(a) Grant to be able to qualify for an Assessment Grant (or a Multipurpose, Cleanup or RLF Grant)?

A: No. Tribes do not have to be a CERCLA 128(a) recipient to be eligible to apply for an Assessment Grant (or a Multipurpose, Cleanup or RLF Grant).

Q: We received a debriefing for an unsuccessful application. In the general comments, it was suggested that we should write our responses to the evaluation criteria and not the ranking criteria. Can you please expand upon this thought?

A: Applications should prepare response to the information requested in Section IV. Of the guidelines. Reviewers will review your responses using the criteria in Section V. of the guidelines. As stated on slide 53, EPA encourages applicant to review your Narrative information against the Evaluation criteria in Section V. of the guidelines. EPA employees can't advise you on how to write a competitive application.

Q: Would we be able to do any kind of region wide inventory and mapping project?

A: In your application, you will be asked to identify a geographic boundary where you plan to conduct work. Your inventory and mapping would be limited to where you plan to conduct work.

Q: How are evaluations made regarding if other recent government awards in adjacent (or concurrent) areas have been made- as long as awards DO NOT serve same EPA criteria/goals?

A: There are no criteria that consider government awards in adjacent areas. However, applicants may discuss other funding that is relevant to the project proposed in the application.

Q: How can I sign up for the Brownfields Listserv?

A: Please submit your contact information here to sign up for the Brownfields Listserv: <https://lp.constantcontactpages.com/su/SVbfoYx/BrownfieldsListserv>

Grants.gov Forms

Q: Will all the Brownfields grants follow the same submittal instructions?

A: Yes, all Brownfield Grant types follow the same submittal instructions.

Q: Are there any resources to help with SAM.gov enrollment?

A: PTAC (Procurement Technical Assistance Center) advisors can help with SAM.gov enrollment: <https://www.aptac-us.org/>.

Community-wide Assessment Grants – No general questions were submitted for this grant type.

Assessment Coalition Grants

Q: Why have cities been excluded from being lead coalition members? Some cities have capacity and experience to share with neighboring entities that do not.

A: The focus of the coalitions is to fund organizations that cover larger geographic areas than individual cities.

Community-wide Assessment Grants for States & Tribes - No general questions were submitted for this grant type.

Multipurpose Grants

Q: If assessments were already conducted, how old should Phase I and Phase II ESAs be? Can we use multipurpose grant to update Phase I/II?

A: Please consult with the regional EPA Brownfields contact in your area as more information is needed to provide a complete response. Depending on the circumstances in which the Phase I/II reports are being used changes to the site conditions may require additional assessment to be performed. Updates to Phase I/II reports are eligible activities as long as the subject site meets all of the eligibility criteria.

THRESHOLD CRITERIA QUESTIONS AND ANSWERS GENERAL QUESTIONS & ANSWERS

General

Q: October 1 is a Saturday, does that mean the drawdown requirement is really tomorrow (September 30)? Also, does this mean the drawdown must be submitted in ASAP, or the funds transferred to us?

A: If ASAP does not show that 70.00% was drawn down by Oct 1, then you may attach a copy of a financial record displaying the amount of cooperative agreement funds drawn down -

e.g., a general ledger entry. EPA may then confirm that our financial records support the documentation provided and shows the draw down shortly after.

Contractor/Subawards

Q: If we have already procured professional services, we understand that we have to provide documentation that the procurement was done in accordance with EPA/Federal requirements. What does that documentation need to consist of?

A: You must describe the competitive process that was followed and explain why you selected the contractor. Note--you must not have consulted, used a sample RFP or otherwise allow any firm that assisted in preparing the RFP to compete for the contract as required by 2 CFR 200.319(b). EPA provides detailed guidance on complying with the regulations. If EPA has questions about the information provided, EPA may ask for documentation. Please see the threshold criterion on *Contractors and Named Subrecipients* in Section III.B. of the grant guidelines for requirements and section D. of the [FY23 FAQs](#) for additional information.

Q: For the dual procurement mentioned earlier, does a signed contract need to be included as part of the procurement documents package?

A: No. EPA is only asking for a description of the competitive process applicants followed in hiring consultants and other contractors. If EPA needs more information or documents, we will do so as part of the application review process.

Q: We procured 6 QEPS in Sept 2021 and our Master Agreements with them extends through Sept 2025. Do we have to list them now and describe that competitive RFQ process we already carried out?

A: Yes.

Q: Should applicants following specific state procurement guidelines?

A: Unless you are applying as a state agency covered by 2 CFR 200.317, you must follow the Federal rules in 2 CFR Part 200 and 2 CFR Part 1500. You must also comply with applicable state law if those laws apply to entities other than state agencies which may be the case for some local governments.

Q: Would any local governments working with us under this grant need to be named as sub-recipients?

A: EPA does not require that you name subrecipients, but you can do so if their qualifications are relevant. Local governments may receive EPA funding as subrecipients.

Q: Can EPA provide any example RFPs/RFQs?

A: No, but TAB providers are a superb resource for providing example RFPs/RFQs or reviewing an RFP/RFQ that an organization has prepared. Some TAB providers can also provide a summary of responses to RFPs/RFQs according to established selection criteria, but cannot, however, make recommendations or be on the selection committee that reviews responses to the RFP/RFQ.

Q: What % of funding MAX can be utilized to provide A&E services, design outreach & product and deliverables on a singular priority site redevelopment?

A: There is no cap on allowable Architecture & Engineering (A&E) services other than the statutory limit on compensating individual consultants described in 2 CFR Part 1500.

Community-wide Assessment Grants

Q: What are the target area requirements for community-wide applications?

A: Applicants are asked to discuss at least one target area.

Q: Will applicants receive fewer points for having just one target area?

A: Applicants for Community-wide Assessment Grants may have one or more target areas, and applicants will not be evaluated less favorably if they only have one target area. Please note that Community-wide Assessment Grants for States and Tribes, and Assessment Coalition Grants have different target area requirements.

Q: For community-wide assessment grants: if you desire to conduct eligible project activities outside of your target area can you only conduct eligible activities in areas that have the same demographics as your target area?

A: If grant funds remain after you have addressed your target area(s) and priority site(s) identified in your application, you may conduct work outside of your target area as long as that work is within your identified geographic boundary and the additional sites meet your identified prioritization criteria.

In response to criterion *1.a.i. Overview of Brownfield Challenges and Description of Target Area*, you are asked to clearly identify the geographic boundaries where you plan to conduct grant activities and your target area(s) within those boundaries. In response to *3.a.ii. Identifying Additional Sites*, you are asked to describe how additional sites will be identified in the event that grant funds remain and what criteria you will use to prioritize additional sites for selection, including criteria that consider underserved communities.

Assessment Coalition Grants

Q: Could an assessment coalition project area include a Region of Cities and Counties with varied non-lead coalition members (for example, two Cities and one County)?

A: Yes - the coalition can include two cities and one county - keep in mind that the non-lead members may not have an open MARC Grant or one that closed in 2015 or later. Additionally, coalitions that include non-lead members that lack capacity to apply for and manage their own grant will be evaluated more favorably.

Q: Can a regional planning Board and a county both be members of a coalition if the County is a represented member?

A: EPA will need more information to answer this. For example, does the County executive or legislative body appoint all of the board members? Is the Board staffed by County employees? These are the types of questions you need to be able to answer. EPA may need to review relevant documents (e.g., charters, ordinances) that describe the relationship between the Board and the County to make a determination.

Q: You mentioned that under coalition grants, it is required to assess two properties under each coalition member's jurisdiction. The application guidelines say to outline one property

under each priority geography. Is the requirement to assess two properties over the life of the grant, or would you like us to include the two properties in the application?

A: In the Assessment Coalition Grant application Narrative, the applicant should identify at least one area in each non-lead member's geographic boundary(ies), and specifically highlight at least one priority site in the lead member's target area and at least one priority site in each non-lead member's target area. If selected, An Assessment Coalition Grant recipient must assess at least two sites within each coalition member's geographic boundary during the grant period of performance.

Q: If our non-lead members don't have a defined geography (a community organization), do they still need to have a target area? They can't just be support for the other non-lead members?

A: Yes, applicants are asked to identify a target area for each coalition member (i.e., the lead and non-lead members), and the target areas may not overlap. A response that does not identify at least one target area in each coalition member's geographic boundary/area will be evaluated less favorably.

Q: Is it a requirement for an Assessment Coalition to have a non-lead "nonprofit" member? Is it sufficient for each non-lead member to have community liaison "partners"?

A: It is not a threshold requirement for an Assessment Coalition to include at least one non-lead member that is a community-based organization/nonprofit. However, under evaluation criterion *1.a.i. Coalition Members*, if the coalition does not include at least one non-lead member that is a community-based organization, then the response to that criterion will be evaluated less favorably.

Community-wide Assessment Grants for States & Tribes

Q: Can you repeat how many sites are required for Target Areas and Priority Sites for Tribes?

A: For a Community-wide Assessment Grant for States and Tribes (up to \$2,000,000), applicants must propose at least three target areas and at least five priority sites, including at least one priority site in each target area. Tribes are also eligible to apply for a regular Community-wide Assessment Grant (up to \$500,000), which can have one or more target areas.

Multipurpose Grants

Q: For the Multipurpose Grant can state registered non-profit organizations without a 501(c)(3) apply through a fiscal sponsor/agent with a 501(c)(3)?

A: No. EPA does not award grants on the basis of a "fiscal sponsor" relationship. The applicant must be eligible for funding and is accountable for performing the grant and proper financial management. An eligible 501(c)(3) recipient may make a subaward to a nonprofit that does not have 501(c)(3) status consistent with certain requirements specified in the EPA Subaward Policy.

Q: If a City owns a site located within a target area ON the application deadline, but then conveys that site to a developer AFTER that date but while the application is being reviewed, does that transfer render the application ineligible?

A: It depends. If the site identified in the application is the ONLY site the applicant owns in the target area, then yes, it could render the application ineligible.

Q: What if the City-owned property in the target area is conveyed to a developer AFTER the date of the EPA award? In that case, could the awarded EPA funds still be used to pay for remediation activities on the transferred property?

A: No. Grant funds can only be used to remediate properties that are owned by the recipient during the period of performance. Please see page 4 of the Multipurpose Grant guidelines.

PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION QUESTIONS & ANSWERS

Q: Can a geographic area be identified by Qualified Census Tracts?

A: It may. Note, if you denote your geographic area by Qualified Census Tracts, all the work performed under the grant would be limited to those Qualified Census Tracts listed in the application.

Q: Is stating the target area is the same as the city's jurisdictional limits an adequate definition of the target area or must the street names that make up the boundaries be included?

A: If you are a city, your city limits/jurisdiction are an acceptable geographic boundary. You are not required to include the street names that make up the city's limits/jurisdiction.

Q: If an Assessment Grant application is more drafted for inventory activities, and does not have (yet) prioritized sites or plans for reuse after assessment determined, will this application still be competitive? Or are you looking for more detail on priority sites?

A: Applications that can respond to the criteria will be evaluated more favorably. For example, we ask applicants to discuss priority sites and strategies for site reuse.

COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS & ANSWERS

Q: Would you be able to define "birth defects" and indicate if measures such as low birth weight and infant mortality fall under birth defects?

A: The Centers for Disease Control and Prevention (CDC) and the National Institute of Child Health and Human Development (NICHD) of the National Institutes of Health (NIH) define a birth defect as: Structural changes present at birth that can affect almost any part or parts of the body (e.g., heart, brain, foot). These structural changes include changes to how the body is built and functional changes to how the body works. Birth defects may affect how the body

looks, works, or both and can cause physical disability, intellectual and developmental disorders, and other health problems.

Low birth weight and infant mortality are important indicators of population health and maternal and child health and may indicate unmet health care needs but are not considered birth defects.

Low birth weight is defined internationally as an infant born weighing 5.5 pounds (2500 grams) or less. A low birth weight may occur when an infant is born too early (premature or pre-term) or due to other factors.

Infant mortality is defined as a child death between birth and their first birthday.

Q: Are there resources or will there be a webinar on the Community Need (2a.) section of the application? Specifically, on using EJScreen and CEJST data to address health/welfare, adverse health conditions, and EJ.

A: Criterion 2.a. *Community Need* was covered in today’s webinar. Please refer to FAQ C.13. and Appendix 1 for more information and demonstrations on how to use EJScreen and FAQ E.8 for information on the Climate and Economic Justice Screening Tool (CEJST) and Justice40: <https://www.epa.gov/brownfields/frequently-asked-questions-about-multipurpose-assessment-rlf-and-cleanup-grants>. You may also reach out to the [TAB Provider](#) in your region for assistance.

Q: What is the threshold for a small population?

A: There is no federal definition of what is considered a “small” population, so we leave it to the applicant to make their case as to why the community is small. However, the Brownfields Program considered communities of 10K and less as “micro” communities, 20K and less = “small”, 50K and less = rural, less than 100K = nonurban. Certainly, communities with less than 50K in population may be considered small.

Q: Can a small community be a target area within a larger city or county, and if so, how do they qualify as small for purposes of this competition, such as a neighborhood isolated by highways or other man made or natural barriers?

A: Yes, a small community may be a target area within a larger city or county. Since there is no federal definition of a “small community,” we leave it to the applicant to make the case/argument to how the community they identified is considered small.

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

Q: Does a local match/leverage offered in the application increase the points awarded?

A: No – it does not. EPA will not evaluate a voluntary match for additional points. See Section IV.F. of the RFA for more information.

Q: Follow-up question, is inventory activities considered a secondary or priority activity?

A: You will need to determine the community's needs. If you plan to conduct inventory work, we recommend discussing that in your application so that activity is already reflected in your plan.

Q: Under section 3.a., the new guidelines require applicants to include a header: "ii. identify additional sites". Is this header required for each Task or only applicable tasks? For example, this language would be pertinent to task 4: Cleanup Planning and Planning Activities. Additionally, this new header is not included in the chart on page 26 of the Community Wide Assessment Guidelines.

A: In the published guidelines, the roman numerals for the sample table are off. We've corrected them in today's presentation and you can respond to Criterion 3.a.ii. *Identifying Additional Sites* outside of the optional table. You do not need to respond to 3.a.ii. in relation to each task/activity.

Q: Including criteria for identifying and selecting your additional sites is required for Community-wide Assessment Grant applicants? Or just State/Tribal/coalition?

A: This criterion applies to all FY23 grant types, except for Cleanup Grants.

Q: Does Site-specific re-use planning fall within the % guideline for site specific work. For example, if a Coalition spends \$50,000 on a site-specific plan, does that get included in the 60% guideline or does it fall outside of the 60% guideline?

A: No. As indicated on page 42 of the Assessment Coalition guidelines, the 60% for site-specific work includes site-specific cleanup planning. The list does not include site-specific reuse planning.

Q: Is the 5% limit on Administrative Costs only applicable to indirect costs?

A: No, Administrative Costs include indirect costs and direct costs for grants administration. By statute, administrative costs for Brownfield Grants are limited to 5% of the amount of funds made available under a Brownfields Grant. See Section O. of the [FY23 FAQs](#) for additional information on Administrative Costs.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE QUESTIONS & ANSWERS

Q: For past Brownfield Assessment Coalition Grants, do we only include those in which we were the lead for past accomplishments?

A: Yes - we only want past performance information for the lead applicant.

Q: Would we remain a past applicant if we had a brownfield assessment grant 15 years ago?

A: Yes, if you have ever received an EPA Brownfields Multipurpose Grant, Assessment Grant, Revolving Loan Fund Grant, Cleanup Grant, and/or 128(a) Grant you are a past recipient.