

# Frequent Questions about Columbia River Basin Funding Assistance Program Requests for Applications

*Last updated 3/9/2023 (updates are marked as “new” or “revised”)*

Below are answers to frequent questions about EPA's [Tribal Request for Applications](#) and [Toxic Reduction Lead Request for Applications](#) for the [Columbia River Basin Restoration Funding Assistance Program](#).

## Related information:

- [EPA Grants Home](#)
- [EPA Grants Management Training for Applicants and Recipients](#)

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## Contents

Frequent Questions about Columbia River Basin Funding Assistance Program Requests for Applications	1
Questions related to webinar materials/logistics:.....	5
1. Are the PowerPoint presentation slides from the webinars available for download? .....	5
2. Will there be recordings of the webinars available for download? .....	5
3. Will the webinars present the same materials, or will there be differences? .....	5
Questions related to project eligibility: .....	5
4. The webinars mention project categories as well as program priorities. Do projects need to address aspects of both lists? .....	5
5. Can these funds be used to fund work on private property? .....	6
6. Are the priority toxics for the Columbia River Basin Restoration Grant Program RFA those listed during CRBRA grant program webinar presentation: mercury, DDT, PBDE, etc.? .....	6
7. Do toxins include emerging chemicals of concern, such as pharmaceuticals? .....	6
8. Are microplastics considered toxins? .....	7
9. Can pollution or runoff containing fecal coliform bacteria, harmful algae blooms (HAB), or nutrients be considered a toxin for the purposes of the Columbia River Basin Restoration Grant Program RFA? .....	7
10. Do all grant proposals need to have a direct focus on toxics? .....	8
11. Is there a focus on environmental justice and serving underserved and tribal communities? .....	8
12. Could you clarify what you mean by “underserved communities”? .....	8
13. Are small-scale restoration projects eligible for funding under the RFA? .....	8
14. If an applicant is awarded a multi-year grant, are consecutive years subject to changes in allocation by Congress .....	9

15. What does “incremental funding” mean? .....	9
16. Can EPA share examples of successful grant projects that were awarded in the FY19/20 and FY21/22 Columbia River Basin grant competitions.....	9
17. Who is eligible to apply under this RFA .....	9
18. Please clarify what is meant by lead applicant or lead entity? Could only one state agency per state apply to be “lead applicant” under the Toxic Reduction Lead RFA? .....	9
19. We have two partnership groups that we participate in planning to apply for the Toxic Reduction Lead RFA in March and we were wondering if we could include green stormwater related activities in both of those? .....	10
20. Are current Columbia River Basin Restoration Grant Program (CRBRP) grantees, who received FY2019-20 or FY2021-22 funding, eligible to apply under this RFA? .....	10
21. The RFA indicates that funding for clean-up actions to remove toxics is allowable so long as it does not duplicate similar work efforts of other EPA-funded programs including but not limited to CERCLA, RCRA, and Brownfields. Does this program support clean up actions in sites where CERCLA funding was used to conduct an assessment of the contamination, but never for clean up? .....	10
22. If a proposal requests funds to build a database with existing data and data to be collected in the future, will the database need to be made publicly available? .....	10
23. <b>NEW</b> Can subawards being proposed for the Toxic Reduction Lead RFA be allocated to permitted entities, such as MS4s? .....	11
Questions related to grant application requirements: .....	11
24. <b>NEW</b> If an entity submitted an application ahead of the RFA deadline, can they alter it? ....	11
25. <b>NEW</b> In the RFA, page 30, Section 5, C. STAFF AND RESOURCES, the text references “Section IV.G of this RFA” for additional information. I don’t believe this section exists. Am I missing it somewhere? .....	11
26. For proposals with multiple collaborators, do an applicant’s project partners need to be registered in the Data Universal Number System (DUNS), Unique Entity Identifier (UEI), and System for Award Management (SAM) in order to apply for a grant? .....	11
27. If two eligible entities are applying, can they be co-applicants? .....	12
28. Can another federal agency be included as a subawardee? .....	12
29. <b>NEW</b> Does the lead entity provide subaward funds to partners on a reimbursement basis or can those funds be passed through annually based on performance benchmarks being met during the prior period? Does the subaward organization have flexibility with respect to timing in allocating those funds, for example holding some funds in reserve into a new fiscal year based on increased project activity level planned during that time period? .....	12
30. <b>NEW</b> Can the subaward organizations include an administration fee for their fiscal management of the subaward funds or would those funds be entirely devoted to implementation? .....	12

31. Does the limit of 2 grant applications per the Tribal RFA or 1 application per the Toxic Reduction Lead RFA, apply to the entity or project lead? For example, could an entity submit more applications to one of the RFAs as long as an individual project lead doesn't exceed the limit of applications? .....	12
32. If an applicant does not have an Indirect Cost Agreement, is there a standard maximum value the applicant can include for indirect costs in the budget?.....	13
33. Does an applicant's Indirect Cost Agreement have to be current for fiscal year 2023? .....	13
34. A lead applicant's set Indirect Cost (IDC) rate is 48%. Would EPA pay the 48% IDC to the applicant or does EPA have a set IDC rate that is lower than the 48%? If so, what is the rate?.....	13
35. If a proposed project includes a subaward and the contractor has an indirect rate, does that indirect rate need to be included if the project applicant is not charging an indirect rate overall?	
13	
36. If the consultant's hourly rate exceeds the EPA allowable maximum rate for a consultant, does that mean the project proposal cannot include consultant type work? .....	13
37. Does the 15-page narrative limit include the cover page or is the cover page considered separate from the 15-page work plan? .....	13
38. Are references considered part of the 15-page limit? .....	14
39. It appears that 'budget detail' is part of the page limit. Can you clarify? .....	14
40. Would it be possible to provide an example of a letter of commitment for cost share? An example of a partnership letter? .....	14
41. The RFA's Past Performance Section asks for evidence of federally funded grants. Should we provide information about the individual applicant's (Principal Investigator's) federal grants, or a list of three federal grants from the entire entity (ideally EPA grants).....	14
42. <b>NEW</b> When completing the SF-424, how do I complete question #19; is the Application Subject to Review by State under Executive Order 12372 Process? .....	14
Questions related to budget:.....	15
43. Can you clarify how to round budget numbers as expected for the SF-424A? .....	15
44. Is there a mandatory cost-share/match requirement for these awards? .....	15
45. Can a tribal non-profit have the 25% match requirement waived? .....	15
46. Does an applicant need to provide budget details for just the grant funded portion of the funds or for both the grant portion and the matching portions of the funding? .....	16
47. When can costs be incurred that are used as match? Does it have to be during the project period? If yes, when does the project period start? .....	16
48. <b>NEW</b> When spending down on the 25% match, does this have to coincide with various stages of the project/budget period? Or could it be saved for the end of the budget period?.....	16
49. If a grantee has matching funds for the Toxic Reduction Lead RFA application, could they start spending them for the proposed grant activities in advance of any potential award and would they still count as matching funds towards that potential grant? .....	16

50. <b>NEW</b> If an entity has settled with a liable party and received mitigation funds which are now administered by the lead entity, could those funds be used to contribute as match? .....	17
51. On page 13 of the Toxic Reduction Lead RFA, it states that environmental mitigation funds may not be used to meet non-federal mandatory cost share requirements. Are Bonneville Power Administration (BPA) funds considered environmental mitigation funds per the language in the RFA? Can entities use BPA funds towards their match requirement? .....	17
52. Can eligible entities contribute to the cost-share requirements if they are collaborators?... 17	
53. <b>NEW</b> If the subaward organization is a Tribal government, does the match requirement for the lead entity still apply to those specific funds passed through to the Tribe? .....	17
54. Can a tribe acting under a sub-award on the project contribute cost share match using tribal funds that were awarded to the tribe from federal sources? Can they contribute cost share as in-kind services? .....	17
55. If a grant application plans to rely on eligible cost share funds that the entity does not currently possess due to budget timing differences (i.e. the funds are expected to be included in the entity's upcoming budget cycle), can the entity account for the expected funds in their proposed budget? .....	18
56. Can in-kind staff time be used as cost share? .....	18
57. <b>REVISED</b> For the Toxic Reduction Lead RFA, is the range of application amounts given expected to be inclusive of the 25% match, or do we add the 25% to the requested amount for a total project budget that is higher than that range? .....	18
58. How do I calculate match?.....	18
59. What is included in the Total Project Cost? Is Mandatory Cost Share included? Should I also include Other Leveraged Funds? .....	19
60. Can one partner cost-share commitment letter be used for more than one application? .....	19
61. Is land acquisition an eligible cost? .....	19
62. Would incentivizing landowners financially through conservation easements with the goal of preventing pesticides from entering the water be an eligible activity? .....	19
63. Do applicants need the same budget detail for each sub-award recipient as for the applicant? Can one include a single line item with the total needs for the sub-awardee's portion of the budget? Is there additional info needed? .....	20
64. Are construction costs allowable? Can you elaborate on what is considered construction?. 20	
65. How are some green infrastructure activities different from construction costs for the purposes of cost categorization? .....	20
66. How do I categorize labor implementation costs? .....	20
67. What Is the difference between Equipment and Supplies object class categories? .....	21
68. Can a grant project provide "prizes" to participants, volunteers, etc.? .....	21
69. Given that a key requirement for applicants to the Toxic Reduction Lead RFA is to award and manage subawards, is there an expectation for percentage of a total grant award that would be	

comprised of subawards? For example, would a project that devotes 50 percent of budget to subawards meet this grant program’s intentions? .....	21
70. NRCS Washington recently released details about a tiered incentive Riparian Buffer Program for agricultural producers to voluntarily plant riparian vegetation for pollutant controls. Direct compensation is ~\$313 per acre with five-year contracts for a total of ~\$1,565 per acre over those five years. The tiers give the option of 4 combinations of covers/buffers. Is this type of compensation program a permitted for this grant? If so, is there a proportional limit that can be set aside for incentives for the maximum grant award? .....	21
Questions related to grant management: .....	22
71. Can you describe the reporting requirements? .....	22
72. How often does EPA reimburse awarded grantees? .....	22
73. Is there flexibility on project start dates? .....	22
74. After this current RFA passes, when do you think the next RFA, and pot of grant funds will be released? Ex. Annually, every other year, etc.....	22

#### Questions related to webinar materials/logistics:

**1. Are the PowerPoint presentation slides from the webinars available for download?**

Answer: Yes, the presentation slides used during all webinars will be available upon contacting [ColumbiaRiverBasinGrant@epa.gov](mailto:ColumbiaRiverBasinGrant@epa.gov).

**2. Will there be recordings of the webinars available for download?**

Answer: The webinars will be recorded but will not be posted on the EPA website. If you would like to request a copy of a recording from either the Tribal or Toxic Reduction Lead webinar, please email [ColumbiaRiverBasinGrant@epa.gov](mailto:ColumbiaRiverBasinGrant@epa.gov).

**3. Will the webinars present the same materials, or will there be differences?**

Answer: EPA has hosted webinars specific to the Tribal RFA, as well as separate webinars specific to the Toxic Reduction Lead RFA. As the two RFAs are different, the presentation materials are slightly different. If you would like slides or a webinar recording from any of these webinars, please email [ColumbiaRiverBasinGrant@epa.gov](mailto:ColumbiaRiverBasinGrant@epa.gov). Also questions from attendees may differ between sessions. EPA will update a FAQ page to include answers to questions asked during each webinar.

#### Questions related to project eligibility:

**4. The webinars mention project categories as well as program priorities. Do projects need to address aspects of both lists?**

Answer: Pursuant to Clean Water Act 123(b)(3)(C) and (d), applications submitted under the Tribal RFA as well as the Toxic Reduction Lead RFA must address at least one of the following categories to be eligible for grant funds:

1. eliminating or reducing pollution;
2. cleaning up contaminated sites;
3. improving water quality;
4. reducing runoff;
5. protecting habitat; or

6. promoting citizen engagement or knowledge.

For these grant competitions, EPA also identified five additional priorities, shown below. Evaluation points (refer to Section V of the RFAs) may be given to projects which address one or more of the following priorities, in addition to addressing one or more of the required project categories above.

1. Agricultural best practices to reduce toxics.
2. Green infrastructure to reduce stormwater and improve water quality.
3. Pollution prevention to prevent toxics from entering the environment.
4. Clean-up actions to remove toxics which do not duplicate similar work efforts of other EPA-funded programs including but not limited to CERCLA, RCRA and Brownfields.
5. Community education and outreach to help the public take actions to reduce toxics in the Basin.

Evaluation scores will not depend on the number of priorities addressed, but rather on the quality with which the priorities are addressed.

**5. Can these funds be used to fund work on private property?**

Answer: It depends. It may be allowed if it is to further the public good. For example, if private property is being used as a pesticide collection event center and it may require some minor upgrades to be usable. Or, if private property is being planted to prevent sediment erosion into a neighboring stream. We would need to know more about the proposal to be able to answer your question and these costs would need to be pre-approved. Please refer to [2 CFR §200.445](#) for more information.

**6. Are the priority toxics for the Columbia River Basin Restoration Grant Program RFA those listed during CRBRA grant program webinar presentation: mercury, DDT, PBDE, etc.?**

Answer: EPA recognizes there are a wide range of toxic concerns throughout the Columbia River Basin related to urban runoff, legacy and emerging contaminants, agriculture, mining, and other sources or impacts. EPA hopes to receive applications that address concerns specific to the localities and/or region where the project work will be based. As a result, the RFA does not identify specific priority toxic contaminants.

**7. Do toxins include emerging chemicals of concern, such as pharmaceuticals?**

Answer: Yes, pharmaceuticals may be considered toxins. Information on toxic contaminants covered by these priorities can be found on the website and include, but are not limited to, mercury, dichlorodiphenyltrichloroethane (DDT), polychlorinated biphenyls (PCBs), polybrominated diphenyl ethers (PBDEs), the Columbia River Toxics Reduction Working Group list of priority pollutants <https://www.epa.gov/columbiariver/prioritization-toxics-columbia-river> and the updated [Contaminants of Concern Framework](#), as well as the toxic pollutants listed by reference in Section 307(a)(1) of the Clean Water Act (see [40 CFR 401.15](#)).

For additional toxics resources please see:

List of chemicals of concern in the Columbia River Basin (April 2020):

<https://www.epa.gov/sites/default/files/2020-03/documents/columbia-river-trwg-toxic-contaminants-reference-list.pdf>

Reference list of toxic contaminants in the Columbia: <https://www.epa.gov/columbiariver/columbia-river-basin-toxic-contaminants-reference-list> .

List of CWA 303(d) listings for toxics also found on our website also identifying where TMDLs have or have not been done: <https://www.epa.gov/columbiariver/toxic-impaired-waterbodies-303d-lists-columbia-river-basin>

[Lower Columbia River Estuary Plan - Comprehensive Conservation and Management Plan \(PDF\)](#) (2011)

<https://www.estuarypartnership.org/our-work/monitoring/toxics>

#### **8. Are microplastics considered toxins?**

Answer: For purposes of this RFA, EPA does not consider microplastics as a toxic contaminant. However, EPA is aware of specific products, such as tire wear particles and their associated breakdown contaminants, for example, that have recently been identified as causing salmon mortality through stormwater exposure. EPA recognizes there are a wide range of toxic concerns throughout the Columbia River Basin related to urban and industrial runoff, legacy and emerging contaminants, agriculture, mining, and other sources or impacts. EPA hopes to receive applications that address concerns specific to the localities and/or region where the project work will be based. As a result, the RFA does not identify specific priority toxic contaminants.

Information on toxic contaminants can be found on our website and include, but are not limited to, mercury, dichlorodiphenyltrichloroethane (DDT), polychlorinated biphenyls (PCBs), polybrominated diphenyl ethers (PBDEs), the Columbia River Toxics Reduction Working Group list of priority pollutants <https://www.epa.gov/columbiariver/prioritization-toxics-columbia-river> and the updated [Contaminants of Concern Framework](#), as well as the toxic pollutants listed by reference in Section 307(a)(1) of the Clean Water Act (see [40 CFR 401.15](#)). Please also see additional toxics resources listed in the above answer.

#### **9. Can pollution or runoff containing fecal coliform bacteria, harmful algae blooms (HAB), or nutrients be considered a toxin for the purposes of the Columbia River Basin Restoration Grant Program RFA?**

Answer: The Columbia River Basin Restoration Act Grant Program's focus is on toxic contaminants. Conventional pollutants such as nutrients, fecal coliform bacteria, or harmful algae blooms (HAB) are not considered toxic contaminants for this work. However, grant applicants can submit an application and their proposal will be evaluated against other applications based on the criteria specified in the RFA.

Information on toxic contaminants covered by these priorities can be found on the website and include, but are not limited to, mercury, dichlorodiphenyltrichloroethane (DDT), polychlorinated biphenyls (PCBs), polybrominated diphenyl ethers (PBDEs), the Columbia River Toxics Reduction Working Group list of priority pollutants <https://www.epa.gov/columbiariver/prioritization-toxics-columbia-river> and the toxic pollutants listed by reference in Section 307(a)(1) of the Clean Water Act (see [40 CFR 401.15](#)). For additional toxics resources check out the [Lower Columbia River Estuary Plan - Comprehensive Conservation and Management Plan \(PDF\)](#) (2011), and <https://www.estuarypartnership.org/our-work/monitoring/toxics>.

EPA's State Revolving Fund programs can help communities combat HABs. The factsheet below explains how the programs work, and provides project examples: [https://www.epa.gov/sites/default/files/2019-03/documents/habs\\_fact\\_sheet\\_and\\_case\\_studies\\_final.pdf](https://www.epa.gov/sites/default/files/2019-03/documents/habs_fact_sheet_and_case_studies_final.pdf)

**10. Do all grant proposals need to have a direct focus on toxics?**

Answer: If the grant proposal meets the required project categories and criteria laid out in the RFA, the project would be eligible for review and evaluation. While the project does not have to be entirely focused on toxics, the overall focus of the Columbia River Basin Restoration Grant Program is on toxics.

**11. Is there a focus on environmental justice and serving underserved and tribal communities?**

Answer: While a focus on environmental justice and serving underserved and tribal communities is not an eligibility requirement it is considered during merit review. The Toxic Reduction Lead RFA includes evaluation criteria and scoring points for how well the application addresses these factors. See Section I.C. of the Toxic Reduction Lead RFA for more information. The Tribal RFA does not include evaluation criteria based on these two factors. See Section I.C. of the Tribal RFA for more information.

All EPA programs have an overlay of addressing environmental justice and tribal communities consistent with Executive Order 13985: “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.”

**12. Could you clarify what you mean by “underserved communities”?**

Answer: For purposes of this competition and the evaluation of applications, “underserved communities” means people/communities of color, low income, tribal and indigenous populations, and other vulnerable populations such as the elderly, children, and those who have pre-existing medical conditions.

Applications will be evaluated based on the extent to which they demonstrate how the activities will address the disproportionate and adverse human health, environmental, climate-related and other cumulative impacts, as well as the accompanying economic challenges of such impacts, resulting from industrial, governmental, commercial and/or other actions that have affected and/or currently affect the underserved communities described in Section I of the RFAs.

**13. Are small-scale restoration projects eligible for funding under the RFA?**

Answer: In general, pursuant to CWA 123(b)(3)(C) and (d), eligible applications include any work efforts that address one or more of the following project categories:

1. eliminating or reducing pollution;
2. cleaning up contaminated sites;
3. improving water quality;
4. reducing runoff;
5. protecting habitat; or
6. promoting citizen engagement or knowledge.

For the Tribal RFA and the Toxic Reduction Lead grant competition, evaluation points (refer to Section V of the RFA) may be given to applications which address one or more of the following priorities:

1. Agricultural best practices to reduce toxics.
2. Green infrastructure to reduce stormwater and improve water quality.
3. Pollution prevention to prevent toxics from entering the environment.
4. Clean-up actions to remove toxics which do not duplicate similar work efforts of other EPA-funded programs including but not limited to CERCLA, RCRA and Brownfields.
5. Community education and outreach to help the public take actions to reduce toxics in the Basin.



Evaluation scores will not depend on the number of priorities addressed, but rather on the quality with which the priorities are addressed.

**14. If an applicant is awarded a multi-year grant, are consecutive years subject to changes in allocation by Congress?**

Answer: No, EPA will be using Infrastructure and Investment and Jobs Act (IIJA) to fund these awards. IIJA funds are not subject to annual allocation changes by Congress. EPA will be incrementally funding the awarded grants each year of the project.

**15. What does “incremental funding” mean?**

Answer: Incremental funding is the partial funding of a contract, with additional funds anticipated to be provided at a later time. EPA will provide funding for multi-year projects in smaller increments awarded each year.

**16. Can EPA share examples of successful grant projects that were awarded in the FY19/20 and FY21/22 Columbia River Basin grant competitions?**

Answer: More information on the grants that were awarded in recent Columbia River Basin grant competitions can be found on the [EPA website](#). In addition, EPA has published success story fact sheets describing the work being done by grantees to monitor, assess, and reduce toxics throughout the Basin. EPA has also developed a Story Map describing the Columbia River Basin Restoration Program which can be found at: [CRBRA Story Map](#).

**17. Who is eligible to apply under this RFA?**

Answer: Under the Toxic Reduction Lead RFA, State governments, tribal governments, regional water pollution control agencies and entities, local government entities, nongovernmental entities, or soil and water conservation districts. For more information see section III of the Toxic Reduction Lead RFA.

Under the Tribal RFA, only federally recognized Tribal Governments are eligible to apply. For more information see section III of the Tribal RFA.

**18. Please clarify what is meant by lead applicant or lead entity? Could only one state agency per state apply to be “lead applicant” under the Toxic Reduction Lead RFA?**

Answer: For the Toxic Reduction Lead (TRL) RFA there is a limit of one application per lead entity or organization. State governments are eligible entities for this funding, and an applicant could be a state government agency. Under the TRL RFA we can accept one application from each separate and distinct state government agency. We cannot accept more than one proposal from the same state government entity or applicant.

Using the State of Fruit as an example, both Fruit State Department of Agriculture and Fruit State Department of Citrus could submit separate lead applications. However, the Department of Agriculture could not submit two applications as the lead, neither could Department of Citrus. An entity could also be a partner on other proposals. For example, Fruit State Department of Agriculture could submit an application where they are the lead entity, and they could also be listed as a partner on another application with a different eligible entity as the lead. In another example, we could accept one application from the City of Apples and one from the City of Bananas. The City of Apples could be a

partner on the proposal from City of Bananas and on a proposal from Fruit Sate Department of Citrus. We could not accept two applications from the City of Apples. The same could be true for two non-profits, each could submit an application in which they are the lead, and they could partner on other applications. Entities, whether they are state government agencies, non-profit organizations, local governments, Tribal governments, etc., cannot submit multiple applications in which they are the lead applicant.

**19. We have two partnership groups that we participate in planning to apply for the Toxic Reduction Lead RFA in March and we were wondering if we could include green stormwater related activities in both of those?**

For the Toxic Reduction Lead RFA there is a limit of one application per lead entity or organization. So long as the two applications have different lead entities both can apply and address the eligible activities outlined in Section I.C. of our RFA, which could include green stormwater related activities. The two applications would need to be for different projects or in different geographies. A partner organization of both lead entities could participate in and be listed as a partner on both proposals. An eligible entity or organization could also apply as a lead on one application and be listed as a partner on the other.

**20. Are current Columbia River Basin Restoration Grant Program (CRBRP) grantees, who received FY2019-20 or FY2021-22 funding, eligible to apply under this RFA?**

Answer: Under the Toxic Reduction Lead RFA all current CRBRP grantees are eligible to apply. Under the Tribal RFA, federally recognized Tribal Governments are eligible to apply under this RFA, including any current or not current CRBRP grantees.

**21. The RFA indicates that funding for clean-up actions to remove toxics is allowable so long as it does not duplicate similar work efforts of other EPA-funded programs including but not limited to CERCLA, RCRA, and Brownfields. Does this program support clean up actions in sites where CERCLA funding was used to conduct an assessment of the contamination, but never for clean up?**

Answer: This program cannot fund projects which are duplicative of work efforts funded by other EPA programs. In the example above, an applicant would need to explain how the cleanup efforts are not duplicative of other EPA funded efforts, why CERCLA funds were not used for cleanup, and why the activity is an appropriate use of Columbia River Basin Funds. Another point of clarification, clean-up projects that are outside a CERCLA operable unit site boundary or address contaminants unrelated to the scope of the CERCLA, RCRA, or Brownfields type of action may be eligible as well.

**22. If a proposal requests funds to build a database with existing data and data to be collected in the future, will the database need to be made publicly available?**

Answer: The programmatic terms and conditions state that "All water quality data generated in accordance with an EPA approved Quality Assurance Project Plan as a result of this assistance agreement, either directly or by subaward, will be required to be transmitted into the Water Quality Portal (WQP) using either WQX or WQX web. Water quality data appropriate for the Water Quality Portal (WQP) include physical, chemical, and biological sample results for water, sediment and fish tissue. The data include toxicity data, microbiological data, and the metrics and indices generated from biological and habitat data. The Water Quality Exchange (WQX) is the water data schema associated with the EPA, State and Tribal Exchange Network." At this time, a database that is developed for a

project or program does not have to be public, but any data generated will have to be uploaded to the WQX system as well.

**23. Can subawards being proposed for the Toxic Reduction Lead RFA be allocated to permitted entities, such as MS4s?**

Answer: If your question is in regard to funding activities that do not directly implement a final NPDES permit; e.g., not explicitly required in a permit or plan required by the permit, then the answer is yes, those activities would likely be allowable. If you are asking about funding activities that are explicitly required as part of their MS4 permit, then we will need further information and to discuss with our legal department to determine the eligibility. If you have specific questions about a certain task within the project you are considering requesting EPA funding for, please email [ColumbiaRiverBasinGrant@epa.gov](mailto:ColumbiaRiverBasinGrant@epa.gov)

Questions related to grant application requirements:

**24. NEW If an entity submitted an application ahead of the RFA deadline, can they alter it?**

Answer: Yes, an entity which has already submitted an application and wishes to revise it before the deadline, may do so. The entity can reapply thru grants.gov. If there is a way for the applicant to indicate that this is a revised version that would be helpful. After the RFA closes and all the applications are received, when EPA sees two applications from the same entity, we'll reach out to verify which application is the final.

**25. NEW In the RFA, page 30, Section 5, C. STAFF AND RESOURCES, the text references "Section IV.G of this RFA" for additional information. I don't believe this section exists. Am I missing it somewhere?**

Answer: That is correct, Section IV.G does not exist. Section IV.G was removed in the final version of the Toxic Reduction Lead RFA and the reference point on page 30 was mistakenly left. If you have questions related to the Staff and Resources section of the work plan, please review the evaluation criteria in Section V.A. If you are looking for additional information on EPA provisions that apply to competitive grant solicitations and/or awards made under solicitations, please visit <https://www.epa.gov/grants/epa-solicitation-clauses>.

**26. For proposals with multiple collaborators, do an applicant's project partners need to be registered in the Data Universal Number System (DUNS), Unique Entity Identifier (UEI), and System for Award Management (SAM) in order to apply for a grant?**

Answer: The grantee is required to be registered in SAM, and have a DUNS or UEI, in order to apply for a grant. Prior to making subawards, the grantee must ensure each subrecipient has a DUNS or Unique Entity Identifier (UEI) number. This is found in the Subaward Policy (<https://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients>). Please see Appendix B of this RFA for more information.

*Starting April 2022 (after this RFA closes) DUNS numbers will no longer be used, instead grantees must use a Unique Entity Identifier (UEI). If your entity is registered in SAM.gov, your UEI is viewable in SAM.gov. The UEI is located below the DUNS Number. You must be signed in to your SAM.gov account to view. For more information visit: <https://www.gsa.gov/about-us/organization/federal-acquisition->*

**27. If two eligible entities are applying, can they be co-applicants?**

Answer: The application process requires one lead entity only and does not allow for co-applicants. However, in your workplan, you can designate other entities as partners or sub-awardees. The Columbia River Basin Restoration Program encourages partnerships. Please see [EPA's Subaward Policy](#) to understand the requirements and differences between subrecipients and contractors.

**28. Can another federal agency be included as a subawardee?**

Answer: Yes, an EPA grant recipient can enter into an agreement with a federal agency to perform services that will be paid for with grant funds provided the federal agency has statutory authority to retain and use the funds. Please reference Section 7.0 (b) of [EPA Subaward Policy](#) for further clarification.

**29. Does the lead entity provide subaward funds to partners on a reimbursement basis or can those funds be passed through annually based on performance benchmarks being met during the prior period? Does the subaward organization have flexibility with respect to timing in allocating those funds, for example holding some funds in reserve into a new fiscal year based on increased project activity level planned during that time period?**

Answer: A lead entity may determine how they manage and fund subawards. However, the lead entity must comply with applicable provisions of 2 C.F.R. Part 200, the [EPA Subaward Policy](#), and EPA's National Term and Condition for Subawards. Note that under 2 C.F.R.200.331 there are extensive requirements for subrecipient monitoring and management that apply to pass-through entities. Please also review Section I.C. of the RFA, *The applicant's plan to manage subawards should address; how solicitations for subaward proposals will be developed, what criteria and review processes will be used, how subaward performance will be monitored, and how subaward projects will implement the applicant's toxics reduction plan and overall program goals.*

**30. Can the subaward organizations include an administration fee for their fiscal management of the subaward funds or would those funds be entirely devoted to implementation?**

Answer: Yes, administrative, and overhead costs can be included in subawards budgets, assuming associated administrative costs are reasonable. Please refer to the [EPA Subaward Policy](#) for additional information.

**31. Does the limit of 2 grant applications per the Tribal RFA or 1 application per the Toxic Reduction Lead RFA, apply to the entity or project lead? For example, could an entity submit more applications to one of the RFAs as long as an individual project lead doesn't exceed the limit of applications?**

Answer: The limit of grant applications applies to the entity or organization, not to individual project leads. In the example above, the entity (Tribal Government) would be limited to a total of 2 grant applications if they are submitting to the Tribal RFA. In the Toxic Reduction Lead RFA, each lead entity is limited to 1 application.

**32. If an applicant does not have an Indirect Cost Agreement, is there a standard maximum value the applicant can include for indirect costs in the budget?**

Answer: If an applicant has never had an Indirect Cost Agreement, the applicant could use a de minimis rate of 10% for indirect costs in their proposed budget. For additional information, refer to the [Indirect Cost Guidance for Recipients of EPA Assistance Grants](#). Potential grant applicants can direct specific questions related to indirect cost agreements or other topics by sending an email to: [ColumbiaRiverBasinGrant@epa.gov](mailto:ColumbiaRiverBasinGrant@epa.gov).

**33. Does an applicant's Indirect Cost Agreement have to be current for fiscal year 2023?**

Answer: To apply for a grant, a project applicant does not need a current Indirect Cost agreement for fiscal year (FY) 2023. The RFA eligibility criteria and grant review process does not consider if an applicant has an FY2023 Indirect Cost Agreement. The details of an organization's Indirect Cost Agreement will only be a factor should a grant application be selected and EPA awards grant funds for the project. During the workplan negotiation period, the organization would need to have a current Indirect Cost Agreement to be able to draw down budgeted indirect costs. For additional information, refer to the [Indirect Cost Guidance for Recipients of EPA Assistance Grants](#).

**34. A lead applicant's set Indirect Cost (IDC) rate is 48%. Would EPA pay the 48% IDC to the applicant or does EPA have a set IDC rate that is lower than the 48%? If so, what is the rate?**

Answer: EPA would use the IDC rate that has been negotiated between the applicant and the federal government. If an applicant is selected, during the workplan negotiation period, the organization would need to provide EPA with a current Indirect Cost Agreement to be able to draw down budgeted indirect costs. If an applicant has never had an Indirect Cost Agreement, the applicant could use a de minimis rate of 10% for indirect costs in their proposed budget. For additional information, refer to the [Indirect Cost Guidance for Recipients of EPA Assistance Grants](#).

**35. If a proposed project includes a subaward and the contractor has an indirect rate, does that indirect rate need to be included if the project applicant is not charging an indirect rate overall?**

Answer: When it comes to subawards, EPA does not ask for a detailed budget for the subaward and therefore would not be reviewing the subrecipient's indirect rate.

**36. If the consultant's hourly rate exceeds the EPA allowable maximum rate for a consultant, does that mean the project proposal cannot include consultant type work?**

Answer: No, the applicant can still submit a work plan and budget that includes consultant type work, if the work supports the work plan and is reasonable, allocable, and allowable. However, EPA can only reimburse up to the maximum allowable amount. See [EPA General Terms and Conditions](#) for the consultant cap. The applicant would need to cover any remaining consultant costs using other funds.

**37. Does the 15-page narrative limit include the cover page or is the cover page considered separate from the 15-page work plan?**

Answer: It depends on how you define cover page. Cover Page, as defined in Appendix A of the RFA, is included in the 15-page limit. The Project Narrative must not exceed a maximum of 15 single-spaced typewritten pages. Pages more than the 15-page limit will not be considered. Please see Appendix A in the RFA for more detail on what should be included in the Project Narrative.

**38. Are references considered part of the 15-page limit?**

Answer: No. Attachments are not included as part of the 15-page limit. Attachments include cost share commitment letters, partnership letters, and resumes (optional). Please see Appendix A of the RFAs for more detail.

**39. It appears that 'budget detail' is part of the page limit. Can you clarify?**

Answer: Yes, the budget detail is part of the page limit. The page limit is for the Project Narrative which includes: cover page, work plan and budget detail. Supporting materials, such as partnership letters, cost share commitment letters, project team biographies, and negotiated indirect cost rate agreements can be submitted as attachments and are not included in the page limit. Please see Appendix A in the RFA for more detail on what should be included in the Project Narrative. Please also see Appendix C in the RFA, the Application Submission Checklist, to ensure that you are including all required materials in your application package.

**40. Would it be possible to provide an example of a letter of commitment for cost share? An example of a partnership letter?**

Answer: Here is an example: [Example Letter of Commitment \(Brownfields - Northern Kentucky Health Department\) \(PDF\)](#). Please go to the [EPA Grants website](#) for more help.

**41. The RFA's Past Performance Section asks for evidence of federally funded grants. Should we provide information about the individual applicant's (Principal Investigator's) federal grants, or a list of three federal grants from the entire entity (ideally EPA grants)?**

Answer: The Past Performance section of the Project Narrative is used by EPA to evaluate an applicant's ability to successfully manage their proposed project based on their past grant performance. Prior EPA grants are preferred; however any federally funded assistance agreements, grants, and cooperative agreements will fulfill the requirement. We are looking for both staff and organizational experience. The applicant is the entity submitting the application. To see how we will evaluate Past Performance, please see Section V of the RFA. Also, please see Section 4, Programmatic Capability and Past Performance, in Appendix A of the RFA for the description, as shown here below. For A and B, if you have no experience, then please state that as well to receive a neutral score.

Reference Appendix A, Section 4.A in the RFAs, for specific requirements.

**42. NEW When completing the SF-424, how do I complete question #19; is the Application Subject to Review by State under Executive Order 12372 Process?**

Answer: The Columbia River Basin Restoration Program (CRBRP) is subject to Executive Order 12372, depending on the activities included in the application. Here is a list of EPA Financial Assistance Programs Subject to Executive Order 12372: <https://www.epa.gov/grants/epa-financial-assistance-programs-subject-executive-order-12372-and-section-204>. CRBRP is listed on page 7., "66.962 Columbia River Basin Restoration Program when proposed financial assistance involves land use planning, construction of infrastructure or stabilization, cleanup or remediation of land contaminated with mining wastes."

If any of these activities are included in your application, you should contact your State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the State intergovernmental review process. However, as of October 2022 only the states of California and Utah have selected EPA programs and activities subject to Intergovernmental Review for SPOC review. Therefore if those listed activities are included in your proposal you will likely choose *b. Program is subject to E.O. 12372 but has not been selected by the State for review*. If the listed activities are not included in your proposal, you will likely choose *c. Program is not covered by E.O. 12372*.

Please note, there may be requirements for submission of Federal grant application to SPOC or other state agencies based on state law that are independent of [40 CFR Part 29](#). EPA encourages applicants to comply with state requirements but does not enforce those requirements. Your financial or grants management office will likely know if there are other state requirements for your state.

#### Questions related to budget:

##### **43. Can you clarify how to round budget numbers as expected for the SF-424A?**

Answer: Yes, please round up or down to the nearest dollar when filling out all budget details, SF-424A, SF-424, and any other documents that include budget information. Do not use cents. Please make sure all your totals add up correctly as well. This information is provided on [www.grants.gov](http://www.grants.gov). Email [ColumbiaRiverGrants@epa.gov](mailto:ColumbiaRiverGrants@epa.gov) for additional guidance.

##### **44. Is there a mandatory cost-share/match requirement for these awards?**

Answer: There is no cost-share requirement for Tribal Governments. Tribal Governments are receiving a match waiver under the IJJA. Please reference section III. Eligibility Information, B. Match/Cost Share Requirements, in the Tribal RFA for specific information.

For the Toxic Reduction Lead RFA, match is required for non-tribal applicants. Non-tribal applicants are responsible for cost-sharing at least 25% of the total cost with non-federal funds. Please reference section III. Eligibility Information, B. Cost-Sharing, in the Toxic Reduction Lead RFA for specific information.

##### **45. Can a tribal non-profit have the 25% match requirement waived?**

Answer: EPA has the discretion and authority to waive the match requirement through both Clean Water Act Section 123 (33 U.S.C. § 1275, amended by Pub. L. 115-270, title IV, § 4105, Oct. 23, 2018, 132 Stat. 3875), and the Infrastructure Investment and Jobs Act (Pub. L. 117-58, November 15, 2021, 135 STAT. 1396). The language authorizing and appropriating Geographic Program funds provides the Administrator the discretion to waive or reduce statutorily required non-federal cost shares on these funds. The authority to approve waivers or reductions of cost shares is delegated to the Regional Administrator overseeing each Geographic Program and may be re-delegated to other regional officials, subject to limitations specified in EPA's Delegations Manual.

For the Toxic Reduction Lead RFA, the 25% match requirement has been waived for Tribal Governments and is required for non-Tribal Government applicants. However, applicants such as tribal non-profits are able to request a match waiver. This should be included in their application and if an applicant is requesting a waiver they could submit their application without the 25% cost-share included in their



budget. An exception to the match requirement is not guaranteed. Please reference Section I.E. Statutory Authority, and Section III. Eligibility Information, B. Cost-Sharing, in the Toxic Reduction Lead RFA for specific information.

**46. Does an applicant need to provide budget details for just the grant funded portion of the funds or for both the grant portion and the matching portions of the funding?**

Answer: The budget, SF424, and SF424A must show the dollar amounts for both the federal portion being requested from EPA as well as the match. Both together constitute the total amount. Please see the example budget detail table in Appendix A of the RFA.

Please note, there is no cost-share requirement for Tribal Governments who wish to apply to either the Tribal RFA or Toxic Reduction Lead RFA.

**47. When can costs be incurred that are used as match? Does it have to be during the project period? If yes, when does the project period start?**

Answer: Yes. Except for eligible pre-award costs as defined in 2 CFR 200.458 and as authorized by 2 CFR 200.309 and 2 CFR 1500.8, no funds awarded under this RFA, or associated match, shall be used to cover expenses incurred prior to the project period. EPA will work closely with selected entities on appropriate project start dates. Projects are expected to begin between August and September 2023, with an expected project completion date of 24 months afterwards.

**48. When spending down on the 25% match, does this have to coincide with various stages of the project/budget period? Or could it be saved for the end of the budget period?**

Answer: There is no drawdown frequency requirement in this program. An entity could wait until the project/budget period end to produce their match. In the application the lead entity will need to show where cost share is coming from (cost share letters, in-kind volunteer hours, etc.). Please keep in mind that if an awarded grant's lifespan is cut short for any reason, the lead entity is still responsible for providing match. In summary, the lead entity is responsible and accountable for producing the records that validate that match was contributed.

**49. If a grantee has matching funds for the Toxic Reduction Lead RFA application, could they start spending them for the proposed grant activities in advance of any potential award and would they still count as matching funds towards that potential grant?**

Answer: Under [2 C.F.R. § 1500.8](#), EPA recipients may incur allowable project costs 90 calendar days before EPA makes an award. Expenses more than 90 calendar day pre-award require prior EPA approval. All costs incurred before EPA makes the award are at the recipient's risk. EPA is under no obligation to reimburse such costs if for any reason the recipient does not receive an award or if the award is less than anticipated and inadequate to cover such costs. Pre-award costs are allowable to the extent they would have been allowable if incurred after the effective date of the award.



**50. If an entity has settled with a liable party and received mitigation funds which are now administered by the lead entity, could those funds be used to contribute as match?**

Answer: Yes, as long as you deem that those liable parties have complied with their mitigation requirements, you would be eligible to use those funds as match. However, please note that non-tribal entities cannot use federal dollars as match. So as long as those mitigation funds are non-federal dollars, they would be eligible. Please see question #54 for more information on tribal entities who wish to use federal dollars as match.

**51. On page 13 of the Toxic Reduction Lead RFA, it states that environmental mitigation funds may not be used to meet non-federal mandatory cost share requirements. Are Bonneville Power Administration (BPA) funds considered environmental mitigation funds per the language in the RFA? Can entities use BPA funds towards their match requirement?**

Answer: The general definition and understanding is that environmental mitigation funds are either as SEP-related injunctive relief or 404 permit-related funds as condition-precedent to the permit being granted. Thus, we consider BPA funds to be federal funds and outside the “environmental mitigation” category. Therefore, BPA funds, according to the above definition regarding being federal funds, are an ineligible cost share for non-tribal applicants.

**52. Can eligible entities contribute to the cost-share requirements if they are collaborators?**

Answer: Yes. Any form of cost share must be included in the Budget Detail portion of the Work Plan, and the application must describe how and when the applicant will obtain the cost share and how the cost share funding will be used. Applicants may use their own funds or other sources for cost share if the standards of [2 CFR 200.306](#), are met. If the proposed cost share is to be provided by a named project partner, a letter of commitment is required. Only eligible and allowable costs may be used for cost share.

**53. If the subaward organization is a Tribal government, does the match requirement for the lead entity still apply to those specific funds passed through to the Tribe?**

Yes, the match requirement applies to the lead entity. The lead entity is responsible for demonstrating the full 25% cost share of the total budget. The lead entity will need to show documentation of match, either as financial contribution or in-kind services. Subawardees are allowed to contribute towards the lead entity’s match, however match could come from other sources as well.

**54. Can a tribe acting under a sub-award on the project contribute cost share match using tribal funds that were awarded to the tribe from federal sources? Can they contribute cost share as in-kind services?**

Answer: Tribes are allowed, in our program per our guiding statute, to use federal dollars as match. Tribes are also allowed to waive their match. However, the lead applicant, if not a tribe, will need to demonstrate the full 25% match. Any eligible entity is allowed to use in-kind services as match. For in-kind services, a dollar amount must be determined, and clearly stated in the cost share commitment letter. For example, it is not enough to say that X organization will contribute in-kind services. The letter must clearly state something to the effect... we are anticipating securing at least 20 volunteers to clean up trash for 8 hours, at a volunteer rate of \$20/hour; 20 people X 8 hours x \$20/hour = \$3,200 worth of

in-kind services. Or, in-kind services could be in staff hour contributions. For example, tribal staff X will participate on our project team for 10 hours per week x 52 weeks X salary/hour.

**55. If a grant application plans to rely on eligible cost share funds that the entity does not currently possess due to budget timing differences (i.e. the funds are expected to be included in the entity's upcoming budget cycle), can the entity account for the expected funds in their proposed budget?**

Answer: Yes. In their proposed budget, grant applicants can include funds even if they do not currently possess the money due to budget timing differences. Cost share or matching funds must be used by the end of the project period. For applicants that provide a mandatory and/or voluntary cost share, the Budget Detail must clearly specify the amount of federal funding and the cost share amount for each category. Any form of cost share included in the Budget Detail must also be included on the SF 424 and SF 424A.

**56. Can in-kind staff time be used as cost share?**

Answer: In-kind staff or volunteer time is allowed. However, the time hours will need to be monetized to show the specific match amount. For example, if you are anticipating hosting an outreach event using approximately 20 volunteers for 2 hours at \$20/hour, then the total = \$800 of in-kind match. See page 4 of the Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance (May 2019) found at: <https://www.epa.gov/sites/default/files/2019-05/documents/applicant-budget-development-guidance.pdf>

Cost sharing or matching specifics can also be found at [2 CFR §200.306 under the Code of Federal Regulations Part 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#).

**57. REVISED For the Toxic Reduction Lead RFA, is the range of application amounts given expected to be inclusive of the 25% match, or do we add the 25% to the requested amount for a total project budget that is higher than that range?**

Answer: The federal portion, or what an applicant is requesting of EPA, is the application amount range (\$3M-\$7M for the Toxic Reduction Lead RFA). The applicant's required cost share is in addition to the federal share. The 25% cost share is 25% of the total budget (EPA + Match), the EPA/federal portion will be 75% of the total, and match will be 25% of the total. For example, if the applicant is requesting the minimum \$3,000,000 in federal funds from EPA, then the total application amount is \$4,000,000; \$3,000,000 (federal funds) + \$1,000,000 (25% cost share of total budget). If the applicant is requesting the maximum \$7,000,000 in federal funds from EPA, then the total application amount is \$9,333,333; \$7,000,000 (federal funds) + \$2,333,333 (25% cost share of total budget).

**58. How do I calculate match?**

Answer: Match amount is 25% of the total budget, not just the federal share. There are two ways to calculate matching funds:

1) Calculate how much you will spend on the entire project, including the EPA federal funds you are requesting and your own and partner contributions. Divide by 4. The result is the minimum match required.

- Example: Total project cost is \$200,000. Divide \$200,000 by 4 and the result is \$50,000. \$50,000 is the amount of your matching funds and you would request \$150,000 from EPA.

2) Calculate how much you will request from EPA only. Divide by 3. The result will be the minimum match required.

- Example: You are requesting \$150,000 from EPA. Divide \$150,000 by 3 and the result is \$50,000. \$50,000 is the amount of your matching funds and the total cost of the project is \$200,000.

**59. What is included in the Total Project Cost? Is Mandatory Cost Share included? Should I also include Other Leveraged Funds?**

Answer: EPA Funding + Mandatory Cost Share = Total Project Cost. Mandatory cost share is 25% of the total project cost. Other Leverage Funds may be included, for description purposes only, but should NOT be included in budget, SF424, and SF424A calculations. Please see pages 34-35 in Appendix A of the RFA.

**60. Can one partner cost-share commitment letter be used for more than one application?**

Answer: Yes, a partner can express commitment for more than one application within one letter as long as the commitment for each application is clearly demarcated within the letter. But the letter must clearly express something to the effect of, "We [X partner] are committing to provide \$X in cost share towards [grant application title A]. (Plus include the details of what the cost share is and where it would be coming from.) We are also committing to provide \$X in cost share towards [grant application title B]. (Plus include the details of what the cost share is and where it would be coming from.) We are committed to providing each separately, or, in the event that both applications are selected and awarded, both portions of cost share."

Also, the commitment letter would need to be uploaded as part of each application package. Project partners who are providing in-kind or monetary assistance must demonstrate their specific commitment to meet the proposed cost share. Letters should be addressed to the applicant organization and included as attachments to the application. Please do not ask partners to submit letters directly to EPA. Please see the RFA for more details.

**61. Is land acquisition an eligible cost?**

Answer: No. EPA's general policy, as reflected on page 4 of the [Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance \(PDF\)](#), is that land acquisition must be authorized under the financial assistance program for the costs to be eligible. It is not authorized under this program and therefore is not eligible.

**62. Would incentivizing landowners financially through conservation easements with the goal of preventing pesticides from entering the water be an eligible activity?**

Answer: In general, a conservation easement program is an allowable type of expense. Your application would need to describe what you are proposing to do and how it will significantly reduce toxics at reasonable cost.

**63. Do applicants need the same budget detail for each sub-award recipient as for the applicant? Can one include a single line item with the total needs for the sub-awardee's portion of the budget? Is there additional info needed?**

Answer: Subawards are a distinct type of cost and get captured under the "Other" budget category. Subaward recipients must comply with applicable provisions of 2 CFR Part 200 and the [EPA Subaward Policy](#). In the Budget Detail, applicants must itemize costs related to personnel, fringe benefits, travel, equipment, installation (labor) supplies, contractual costs, other direct costs (subawards, participant support costs), indirect costs, and total costs. Please refer to Appendix B of this RFA for detailed guidance on funding projects and partnerships and how to correctly categorize these costs in the workplan budget.

**64. Are construction costs allowable? Can you elaborate on what is considered construction?**

Answer: Yes. Construction costs may be allowable under this RFA, particularly for construction necessary for green infrastructure activities that involve permanent improvements to real property and clean-up activities. The term "construction" as used in this RFA means "erection, alteration, or repair (including dredging, excavating, and painting) of buildings, structures, or other improvements to real property, and activities in response to a release or a threat of a release of a hazardous substance into the environment, or activities to prevent the introduction of a hazardous substance into a water supply." See [40 CFR 33.103](#). Construction costs included in the Construction budget category may include site preparation, demolishing and building facilities, making permanent improvements to facilities or other real property, and major renovations of existing facilities. In general, a project is considered construction if it includes building a permanent non-movable structure, such as pouring concrete, but can include other improvements to the property. Examples could include bioswales, permeable pavement, green streets, green roofs, and other examples found on the [EPA website](#). Note that although architectural or engineering services relating to a construction project are eligible construction activities, estimated costs for those services should be budgeted for in the Contractual category rather than the Construction category. More information can also be found in [EPA's Interim General Budget Development Guidance](#).

**65. How are some green infrastructure activities different from construction costs for the purposes of cost categorization?**

Answer: Whether a green infrastructure activity should be categorized as construction costs depends on the activity. [Green infrastructure](#) activities that do not result in permanent improvements to real property are generally not considered to be construction and are allowable as Supply, Equipment or Contractual costs. Examples include rain gardens, rain barrels, planter boxes, rainwater harvesting, or designing and planning other green infrastructure activities, etc. Green infrastructure activities which fall under EPA's definition of construction (see question above) may also be allowable. Awards will be accompanied with programmatic terms and conditions that will distinguish specific guidelines. If you have specific questions about a certain task within the project you are considering requesting EPA funding for, please email [ColumbiaRiverBasinGrant@epa.gov](mailto:ColumbiaRiverBasinGrant@epa.gov).

**66. How do I categorize labor implementation costs?**

Answer: Labor can be funded in many ways, and depending on which type of labor you use, the Object Class Category will be different. For example, paying for applicant staff time dedicated to the project comes under Personnel, consultant or partner staff time comes under Other as a sub-award, if you are contracting for commercial services then that would come under Contractual. And then you could also

have labor as a contribution from a partner and serve as cost share match. So, how you categorize labor costs does depend on what type of labor you are thinking of using.

**67. What Is the difference between Equipment and Supplies object class categories?**

Answer: Equipment is an item with a cost of \$5000 or more per unit and a useful life of more than one year. Items that cost less than \$5000 per unit are considered Supplies.

**68. Can a grant project provide “prizes” to participants, volunteers, etc.?**

Answer: Every purchase needs to be tied to the workplan outputs and the overall project outcomes. For example, if at a funded event frisbees are given away with no connection to the project, that would be unallowable. Grantees cannot give away “prizes” that appear random. However, if the grantee were to give away water bottles with their program’s website printed on them to encourage people to use reusable water bottles, this may be allowable. The grantee would work with their Grant Project Officer for specific activities.

**69. Given that a key requirement for applicants to the Toxic Reduction Lead RFA is to award and manage subawards, is there an expectation for percentage of a total grant award that would be comprised of subawards? For example, would a project that devotes 50 percent of budget to subawards meet this grant program’s intentions?**

Answer: There is not a requirement nor expectation for a percentage of the total grant award to be comprised of subawards. EPA is looking for applicants interested in being a Toxic Reduction Lead; an entity could lead through subawards as noted in our RFA, but also by creating a significant presence in the Basin through playing a major role in reducing toxics. A few roles identified in the RFA for Toxic Reduction Leads are to develop, implement, and manage a multi-phase or large-scale program or programs which leverage partnerships and include a comprehensive toxics reduction plan; lead program and policy development and provide technical assistance; award and manage subawards; and participate in the Columbia River Basin Restoration Program Working Group and provide periodic program updates at the bi-annual meetings. We are not requiring applicants to devote certain percentages of their budget towards any one activity, but rather are interested in learning of an applicant’s plan through their narrative and budget detail. EPA will evaluate all applications based on the evaluation criteria outlined in Section V of the RFA.

**70. NRCS Washington recently released details about a tiered incentive Riparian Buffer Program for agricultural producers to voluntarily plant riparian vegetation for pollutant controls. Direct compensation is ~\$313 per acre with five-year contracts for a total of ~\$1,565 per acre over those five years. The tiers give the option of 4 combinations of covers/buffers. Is this type of compensation program a permitted for this grant? If so, is there a proportional limit that can be set aside for incentives for the maximum grant award?**

Answer: EPA is looking for activities that substantially reduce toxics in the basin and have a foundational or lasting effect, per the scoring criteria found in the RFA (please see question #10 in the FAQ document). Based on the brevity of your statement, I am unsure if what you are proposing is eligible, but it does not seem ineligible. For example, a program considering using planting incentives as part of a larger outreach program to target significant reductions of toxins from high soil erosion areas would be

eligible. All proposals received will be reviewed for eligibility, merit and recommendations put forward to the Selection Official.

#### Questions related to grant management:

##### **71. Can you describe the reporting requirements?**

Answer: Quarterly check-ins, semi-annual progress reports and a detailed final report will be required. Semi-annual reports summarizing technical progress, planned activities for the next quarter and a summary of expenditures are required. The final report shall be submitted to EPA within 120 calendar days of the project end date. The final report must include: summary of the project or activity, outputs, outcomes, environmental results, advances achieved and costs of the project or activity. In addition, the final report shall discuss the problems, successes, and lessons learned from the project or activity that could help overcome structural, organizational, or technical obstacles to implementing a similar project elsewhere. The schedule for submission of quarterly reports will be established by EPA, after the grants are awarded. Award recipients may be provided with additional information and guidance on reporting performance measures and project progress after award.

##### **72. How often does EPA reimburse awarded grantees?**

Answer: Grantees will have access to a system called Automated Standard Application for Payments (ASAP) where they will drawdown as needed. As required by [2 CFR 200.305\(b\)](#), recipients must only draw funds for the minimum amounts needed for actual and immediate cash requirements to pay employees, contractors, subrecipients or to satisfy other obligations for allowable costs under the assistance agreement. The timing and amounts of the drawdowns must be as close as administratively feasible to actual disbursement of EPA funds. The payment policy states that any funds drawn must be expended within 5 business days.

##### **73. Is there flexibility on project start dates?**

Answer: Yes, there is flexibility on the project start date. EPA will work closely with selected entities on appropriate project start dates. Projects are expected to begin between August and September 2023, with an expected project completion date of the number of allowable project period years according to the RFA, 4-6 years for both the Tribal and Toxic Reduction Lead RFAs.

##### **74. After this current RFA passes, when do you think the next RFA, and pot of grant funds will be released? Ex. Annually, every other year, etc.?**

Answer: We do not have a position on the timing of future funding opportunities at this time. Visit the [Columbia River Basin Restoration Program website](#) for information on upcoming funding opportunities.