

On September 26, 2023, EPA's Office of Brownfields & Land Revitalization held a live webinar to assist applicants with preparing the **Narrative portion** of their applications for the Fiscal Year 2024 **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.

Note that **general application submission, the Narrative Information Sheet, and Threshold requirements**, were covered in the recordings available on the [MARC Grant Application Resources – “Open Solicitations”](#) webpage under Pre-Recorded Videos on Minimum Grant Requirements.

If you have general questions about EPA's Brownfields Program, the content of the pre-recorded videos, 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: Where are the presentation slides posted?

A: A copy of the presentation and the webinar recording are available on the [MARC Grant Application Resources – “Open Solicitations”](#) webpage (see Grant Guideline Outreach Webinars - Narrative Ranking Criteria).

Q: Will a summary of the links from the chat be made available?

A: All the links provided in the webinar chat are also in the presentation slides. To access the respective links, please download a copy of the slides from the [MARC Grant Application Resources – “Open Solicitations”](#) webpage.

Q: Will a government shutdown affect the November 13th grant deadline?

A: At this point, it's too early to determine if a possible shutdown will impact the November 13th deadline. If EPA staff are not available, we recommend contacting the [Technical Assistance to Brownfields \(TAB\) provider](#) in your area.

Q: Who represents Rural/ Small communities/ the middle part of the country when decisions are made at EPA HQ? I know it's not going to change for this year, but taking over a week off the timeline for this year's competition especially impacts rural/ small communities who write their own grant proposal and gives a strong preference to communities who have access to experienced grant writers (i.e. consultants). Many entities also have internal reviews/ deadline to submit things in grants.gov and reducing the overall timeline gives them even less time to put a proposal together in time to meet those deadlines. I'm guessing there was some internal timeline that EPA was trying to adhere to but this is another example of a decision that EPA makes that (inadvertently) negatively effects rural/small communities since they don't have a seat at the table.

A: Thank you for your comment and sharing your frustration. We strive to have funding opportunities open for longer than the required 45 days (typically about 60 days) and unfortunately we faced some challenges releasing the NOFOs as originally planned. We will take your comment back to EPA's management.

Q: In the last round, how many applications did you get, and how many were selected? Did this change after Bipartisan Infrastructure Law (BIL) funding?

A: In FY23, we received 478 MARC Grant applications and selected 267. Pre-BIL, we typically had enough funding to select approximately 150 applications.

Grants.gov Submission/Federal Forms

Q: Will www.grants.gov be affected if there is a federal government shutdown?

A: No, www.grants.gov should not be affected if there is a federal government shutdown.

Q: Question VII of the Preaward Compliance Review Report (EPA Form 4700-4) asks about having a policy/procedure related to discrimination in place. If we answer "No", what will happen to our application?

A: If the EPA Form reviewer identifies a deficiency in the applicant's response to Question VII (e.g., the response is left blank or is marked "No"), the EPA Form reviewer will contact the applicant's Point of Contact identified on the Form 4700-4 for additional information. If the applicant is unable to update/correct the information provided on the Form, EPA will request that the applicant enter into a written agreement with EPA to provide time for the applicant to remedy the identified deficiency to meet EPA's nondiscrimination regulatory requirements. If selected for funding, the agreement must be reached before the award processing will continue, but it will provide the applicant time even after the award has been made to complete the required actions. For additional information, please see [EPA's Tips for Completing EPA Form 4700-4](#) page. EPA's Office of External Civil Rights Compliance is also available to provide technical assistance.

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

Assessment Coalition Grants

Q: If a City and County are the same government entity, are they eligible to be a lead for an Assessment Coalition Grant?

A: Yes. But to confirm eligibility, please contact your Regional Brownfields Contact listed in Section VII. of the Guidelines to provide details on your proposed coalition arrangement.

Q: Can a Development District (EDA) be a lead for an Assessment Coalition Grant?

A: EPA will require additional information to determine eligibility. Please contact your Regional Brownfields Contact listed in Section VII. of the Guidelines to inquire if the EDA could be the lead of a coalition grant.

Q: Would a Land Bank count as a separate coalition entity?

A: Depending on how the land bank was established, it is possible for a land bank to either be an Assessment Coalition lead or a non-lead member. For example, if the land bank is an agency or instrumentality of the county government that was established pursuant to state

or county law, it would be eligible to be the lead coalition (provided that the county government did not also apply in the same competition year). An independent non-profit land bank would not be eligible as the lead. Each case is very fact-specific and EPA would need more details to determine eligibility. Please contact your Regional Brownfields Contact listed in Section VII. of the Guidelines regarding land bank eligibility for Assessment Coalitions.

Q: For Assessment Coalition Grants, when the lead applicant is a regional planning council, and the coalition partners are cities within the planning council's jurisdiction, the planning district still HAS TO HAVE their OWN target area in addition to each coalition member's city's target areas, correct?

A: That is correct. Every member of the coalition (including the lead) must propose separate target areas.

Q: When the lead is a regional council type entity, can their target area consist of their entire region for the purpose of creating an inventory of Brownfields in their region/district? Or does the target area have to be narrower than that?

A: The example you provided serves better as the geographic boundary than the target area. However, we leave it to the applicant to determine the target area. The geographic boundary, which is legally binding, will be the entire area in which work can be performed throughout the project period when funds remain after addressing sites within the identified target area.

Q: Why did the EPA eliminate quasi-governmental entities as the lead coalition member for a Coalition Grant? They were eligible for at least ten years before last year and again this year. In distressed communities, these quasi-governmental agencies can have much more capacity than local governments, and eliminating them as lead Coalition members is counterproductive.

A: Eligible lead entities for a coalition include Regional Councils established under governmental authority (e.g., regional planning commissions and Groups of General Purpose Units of Local Government established under Federal, state or local law (e.g., councils of governments) to function as a single legal entity with authority to enter into binding agreements with the Federal Government. A couple of years ago, EPA re-structured the coalition model to better align with the intent of the grant type - for one "lead" eligible entity to partner with two to four eligible entities that do not have the capacity to apply for and manage their own EPA cooperative agreement and otherwise would not have access to Brownfields Grant resources. Further, EPA has shifted the focus to organizations that cover a larger geographic area with multiple communities.

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

Multipurpose Grants

Q: Multipurpose Grants can be used for both assessment and cleanup. Can a cleanup occur on a property not owned by the applicant?

A: Multipurpose Grant funds may only be used to conduct cleanup at eligible properties owned by the grant recipient (i.e., the applicant). Please note that the applicant/grant

recipient does not need to own ALL of the cleanup sites at the time of application. The threshold requirement is that they must own AT LEAST ONE site at the time of application.

Q: In previous Multipurpose Grants, we had several target areas. I am planning to have several target areas in the FY24 application. Is that allowed/possible?

A: No, that would not be allowed. FY 2024 Multipurpose Grants are only allowed to have one target area.

Q: For a Multipurpose Grant, is a Phase II required if one has previously been conducted?

A: Multipurpose Grant recipients will be required to, at a minimum, conduct one Phase II environmental site assessment and remediate one site. The Phase II and remediation do not have to occur on the same site. Therefore, if a Phase II is has already been conducted at a site, the recipient must conduct the required Phase II at another site.

PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION QUESTIONS & ANSWERS

Q: Please explain the difference between noting the need for funding in the Community Need section and "the extent to which the grant will stimulate the availability of additional funds to support the completion of the environmental site assessment or remediation" noted in Leverage funding section. If we say that we can access State/Tribal TBA funds in the Leverage section, will that count against us in the Community Need section?

A: The *Community's Need for Funding* criterion focuses on the needs of their entire community for communities with small and/or low-income populations. The *Strategy for Leveraging Resources* sub-criterion on *Resources Needed for Site Reuse* focuses on what resources, you as the applicant, can leverage to make the project successful and complete the assessment or cleanup, and reuse of the priority site(s).

Q: Where can we go for more examples of climate protection that may affect assessment and cleanup activities?

A: We invite you to review resources that are included in Section S and T of the FY24 [FAQs](#).

COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS & ANSWERS

Q: What mapping tool can we use to determine if our community is an underserved community?

A: Applicants may use [EJScreen](#) and/or [CEJST](#) (referenced on slide 38 of today's "FY 2024 Multipurpose and Assessment Grant Narrative Ranking Criteria Outreach Presentation" on the [MARC Grant Application Resources – "Open Solicitations"](#) webpage) to determine if their community is underserved. CEJST was developed for Justice40 and identifies whether a census tract is considered disadvantaged.

Q: Under Community Need, does the “small population” apply to the target area or the Town/City the target area is in?

A: A small community may be a target area within a larger city or county.

Q: What is considered a small population? FAQ E.12. references a population of 20,000 as small, but does that mean in the target area or the entire community? If I am focusing on a certain target area inside a city, does the small population number only apply to the number inside that target area?

A: 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. [FAQ E.12.](#) provides additional details on what may be considered a small population.

Q: If only one priority site is in a disadvantaged census tract, will the proposal get full points for the Threats to Sensitive Populations section? Or is it a sliding scale (e.g., the more priority sites that are disadvantaged per CEJST, the higher the point value)? (Assuming the rest of the section criteria are met.)

A: If at least one priority site is located in a disadvantaged census tract according to CEJST, the response may potentially earn full points for the *Identification of Environmental Justice Issues* criterion. It is not a sliding scale.

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

Q: If a tank removal is anticipated at a site as part of a Phase II ESA on a Community-wide Assessment Grant, are those costs included under construction, or under Phase II?

A: If an Assessment Grant applicant plans to include a tank removal as part of their project, they should still follow the principal purpose of the contract test. If a QEP needs to hire a subcontractor to remove a tank (for sampling beneath the tank) the cost for that activity is unlikely to change the principal purpose of the assessment contract to construction. However, if the recipient uses a separate contract to pay for the tank removal, then that contract would need to be characterized as construction costs.

Q: Is a Multipurpose Grant less competitive if the cleanup costs are unknown?

A: No, a Multipurpose Grant application is not less competitive by default if the cleanup costs are just estimates at the time of application. Please keep in mind that Multipurpose Grant recipients will be required to, at a minimum, remediate one site (as well as conduct one Phase II environmental site assessment). To be eligible for Multipurpose Grant funding, an applicant must own a site(s) that meets the CERCLA § 101(39) definition of a brownfield. An applicant must own a brownfield site(s) within their target area where cleanup activities may be conducted by November 13, 2023.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE QUESTIONS & ANSWERS

Q: Is it appropriate (or advantageous) to summarize non-federal brownfield assistance (i.e., State Agency, etc.?)

A: Applicants must choose one of the three options in response to the *Past Performance and Accomplishments* criterion. If you have never received an EPA Brownfields MARC or 128(a) Grant, but have received other federal or non-federal assistance agreements (such as a grant or cooperative agreement including only receiving an Area-Wide Planning Grant or Environmental Workforce Development & Job Training Grant), the summarizing those resources would be appropriate.

Q: What's a "neutral score"?

A: Applicants that indicate that they do not have a history of performing assistance agreements will receive a “neutral” 8-point score for this factor (which is about half of the total available points). However, failure to indicate anything in response to this sub-criterion may result in zero points.