

On September 19, 2024, 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 2025 **Community-wide Assessment Grants, Assessment Coalition Grants, and Community-wide Assessment Grants for States and Tribes**. 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: Is there a link we can access to read through successful applications from FY24?	A: For examples of past applications, please contact KSU TAB: Scott Nightingale (scottnight@ksu.edu). You can also contact the TAB Provider for your EPA Region: https://www.epa.gov/brownfields/technical-assistance#Technical Assistance
Q: How can I be added to the EPA Office of Brownfields and Land Revitalization listserv?	A: Please sign up for the EPA Brownfields listserv here: https://lp.constantcontactpages.com/su/SVbfoYx/BrownfieldsListserv .
Q: Can a community liaison be an organization? Or must it be an individual, i.e. independent person?	A: Yes, a community liaison can be either a community based nonprofit organization (CBO) or an individual. Individuals may be compensated through participant support costs, and CBOs through subawards including small subawards of \$10,000 or less using micro-purchase procedures. (Refer to RAIN-2018-G04-R1). For the purposes of using participant support costs, recipients may use a portion of the Assessment Grant for eligible participant support

costs associated with one community liaison per target area who is not an employee of the grant recipient. This may include reasonable stipends to compensate an individual community member's time and travel costs for participating in project-related meetings (e.g., meetings with the community, meetings held by a brownfields advisory board, etc.) and time associated with other specific tasks that are directly tied to related community engagement efforts. but Only one individual per target area can be compensated using participant support costs.

Q: If the target area includes sites that may be ineligible for brownfield funding, do we need to describe their exclusion in our target area description?

A: No, your application should focus on identifying your target area and priority sites, namely priority sites that may be eligible for funding. Please contact the Brownfield representative listed in Section VII. of the Guidelines for questions about determining whether a site is eligible for Brownfields funding.

Q: Can a copy of the transcript for these slides also be provided?

A: The recorded training with closed captioning is available on the [MARC Grant Application Resources – “Open Solicitations”](#) webpage.

General Eligibility

Q: To what level do you need to demonstrate funds are drawn down to the 70%? Does it have to have been paid to the vendor or just submitted to procurement for payment?

A: To demonstrate you've met the draw down requirement, applicants must attach a copy of a financial record displaying the amount of cooperative agreement funds drawn down (e.g., a report from the Automated Standard Application for Payments (ASAP) or general ledger entries). If necessary, applicants may contact the assigned EPA Project Officer for the cooperative agreement(s) or Elyse Salinas (brownfields@epa.gov) to obtain draw down information from EPA's grant financial database (Compass Data Warehouse).

Q: Are entities in Puerto Rico eligible for EPA Brownfields MARC Grant funding?

A: Yes, under CERCLA § 104(k)(1)(F), states as defined in CERCLA § 101(27) are eligible for EPA Brownfields MARC Grant funding. That definition of States “include[s] the several States of the United States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the United States Virgin Islands, the Commonwealth of the Northern Marianas, and any other territory or possession over which the United States has jurisdiction.”

Q: Can a municipality submit a solo application and also be a non-lead member of a Coalition?

A: No, the same organization cannot apply for an FY25 Community-wide Assessment Grant and as a non-lead coalition member for an FY25 Assessment Coalition Grant (i.e., they can only apply for one or the other). The FY25 Eligibility Chart for Multiple Applications clarifies eligibility for applicants interested in applying for more than one grant type: https://www.epa.gov/system/files/documents/2024-08/who-can-apply-for-what-charts_combined.pdf.

Q: Do contaminated waterways (rivers/lakes) count as brownfield sites to be covered by an assessment grant?

A: It depends. Brownfield sites are real property. Under CERCLA 104(k)(6)(C)(x)(i), EPA can consider whether a site is adjacent to a body of water when evaluating grant applications but an assessment of whether the waterway itself is contaminated would only be eligible for funding if the contamination has a potential impact on the real property comprising the site. If a property includes a waterfront, that area may also be eligible for assessment. Please contact the Brownfield representative listed at the end of the presentation or in Section VII. of the Guidelines. That is the office that can assist with determining if the site is eligible for funding.

Q: Can a Target Area for an Assessment Grant overlap with an individual city Cleanup Grant application property as long as the priority sites are different?

A: It depends. If an applicant is applying for both an Assessment Grant and a Cleanup Grant, the expectation would be for those applications to focus on different priority sites (i.e., the proposed site in the Cleanup Grant application wouldn't be a priority site under the Assessment Grant application). To be eligible for a Cleanup Grant, the site must already have a Phase II Environmental Site Assessment report or equivalent report. Please contact the Brownfield representative listed at the end of this presentation or in Section VII. of the Guidelines. They may need additional information and details about your particular circumstance to provide an accurate response.

Q: If my organization does not have the 501(c)(3) status yet, and it is not registered in grants.gov, can another organization that does have all this in place, submit the proposal as a fiscal sponsor?

A: No. Applicants for EPA funding apply on their own behalf and become the recipient as that term is defined in 2 CFR 200.1. EPA does not recognize the "fiscal agent"/"fiscal sponsor" concept. More information about this can be found in EPA's Subaward Policy Frequent Questions (#49-51) available here: https://www.epa.gov/system/files/documents/2023-04/epa_subaward_policy_frequent_questions.pdf.

Grants.gov Submission/Federal Forms

Q: What is an AOR?

A: The AOR is the Authorized Organization Representative. The AOR is someone that has been granted legal authority to request federal funding on the organization's behalf. The AOR must be designated by your organization's E-Business Point of Contact which is listed in sam.gov. Multiple people may help prepare the application in the grants.gov workspace, but the application must be submitted by the AOR or EPA will reject the application.

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

Assessment Coalition Grants

Q: If an organization is currently the lead entity of an open Assessment Coalition Grant, but that grant will be closed before the application submission deadline, are they eligible to be the lead applicant for a new Assessment Coalition Grant?

A: Yes. If the lead applicant for an Assessment Coalition Grant has an open Brownfields Assessment or Multipurpose Grant, they must be able to demonstrate they have drawn down and disbursed at least 70% of the funds for the grant. See the [FY 2025 Eligibility Chart for Multiple Applications and Existing Grant Recipients](#) for a visual aid.

Q: One of the presentation slides says "Entities with an open Brownfields MARC Grant that can demonstrate they have drawn down 70% of the funding for each open MARC Grant are eligible to be a non-lead member." Can both lead and non-lead members of an Assessment Coalition Grant have an open Brownfields MARC Grant?

A: Yes, both the lead applicant and non-lead members of an Assessment Coalition Grant can have an open Brownfields MARC Grant, however they must meet the drawdown requirement and at least one non-lead coalition member must have never been awarded a Brownfields MARC Grant. If the lead applicant for an Assessment Coalition Grant has an open Brownfields Assessment or Multipurpose Grant, they must be able to demonstrate they have drawn down and disbursed at least 70% of the funds for the grant. Non-lead coalition members may also have an open Brownfields MARC Grant (i.e., Multipurpose, Assessment, RLF, or Cleanup) and they must also demonstrate they have drawn down and disbursed at least 70% of the funds for the open grant.

Q: How can an applicant determine if an entity has ever received a Brownfields MARC Grant if they aren't sure?

A: Please contact the Regional Brownfield representative listed in Section VII. of the Guidelines. They can assist with determining if an entity has ever received an EPA Brownfields MARC Grant.

Q: Do consolidated city/county entities qualify as a lead for coalition grants?

A: Maybe. We need more information regarding the legal structure of the consolidated city/county entities. Please contact the Brownfield representative listed at the end of the presentation or in Section VII. of the Guidelines, who can assist with determining eligibility.

Q: Are cities eligible to be a lead entity of an Assessment Coalition Grant?

A: No. Cities and towns are not eligible to be a lead member of an Assessment Coalition, but they are eligible to be a non-lead member. Assessment Coalition Grants are intended for lead entities that cover larger geographic areas than individual cities. For the full list of eligible entities that can apply for funding, please see Section III.A. in the Guidelines. For eligibility questions, please contact the Brownfield representative listed at the end of the presentation or in Section VII. of the Guidelines.

Community-wide Assessment Grants for States & Tribes

Q: For CWAGST, can applicants list multiple census tracts in one target area?

A: Yes. Per section IV.D. Narrative Information Sheet of the guidelines, (state applicants only) for each target area that is smaller than a city/town, list the eleven-digit census tract number(s) within the target area. It is ok to list multiple census tracts in one target area.

Q: For Community-wide Assessment Grants for States and Tribes, do all assessed properties need to be in an underserved community?

A: No, all priority sites identified for assessment in the application do not need to be in an underserved community. Recipients of Community-wide Assessment Grants for States and Tribes (CWAGST) will be required to assess sites (a minimum of 10) throughout their geographic boundary(ies). However, all sites selected during the period of performance that were not identified in the original workplan must be located in an underserved and/or disadvantaged community.

Q: For CWAGST, can some properties/target areas be outside an underserved area?

A: Yes, some properties/target areas can be outside of an underserved community if the properties/target areas are clearly identified in the application.

Multipurpose Grants

A solicitation for Multipurpose Grants was not issued for the FY 2025 cycle.

PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION QUESTIONS & ANSWERS

Q: Does a geographic boundary need to be site-specific, or can it be a jurisdictional boundary?

A: No, the geographic boundary does not need to be site-specific and can be a jurisdictional boundary.

Q: When identifying additional sites for eligible activities, are applicants limited to sites within the identified target area(s)?

A: No. For identifying additional sites, under criterion 1.a.iii. Identifying Additional Sites, applicants will be limited to the geographic boundary(ies) (not the target area) identified in criterion 1.a.i. Overview of Brownfield Challenges and Description of Target Area.

Q: Under 1.c.ii. Use of Existing Infrastructure, what types of buildings are considered infrastructure? Are residential buildings considered infrastructure?

A: CERCLA does not include a definition of infrastructure. However, for the purposes of the CERCLA 104(k)(6)(C)(iv) ranking criterion (“The extent to which a grant would facilitate the use or reuse of existing infrastructure”) buildings such as single or multi-family residential buildings, may be considered infrastructure. Note, that the definition of “infrastructure” for purposes of this criterion, is entirely separate from the definition of “infrastructure” for purposes of Build America, Buy America applicability (P.L. 117-58, §§ 70911-70917).

COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS & ANSWERS

Q: What is the difference between health or welfare of sensitive populations and the next section on greater than normal incidence of disease and health conditions?

A: Health or welfare issues and the incidence of disease and adverse health conditions will vary by community. Health or welfare issues may reflect the health, safety, security

(economic and non-economic), and well-being (e.g., environmental, social) concerns of sensitive populations in a community. Some health or welfare issues may result from the impacts of climate change. Criterion 2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions specifically asks about the incidence of diseases or conditions (including cancer, asthma, or birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum.

Q: The presenter mentioned examples of environmental justice issues that may affect an underserved community(ies) and/or a disadvantaged community(ies). What were those examples?

A: Examples of Environmental Justice challenges may include but are not limited to: lack of job opportunities; lack of access to services, for instance, healthcare; lack of public transportation; food deserts; loss of population; air pollution; drinking water and soil issues; low property values; and disinvestment.

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

Q: How are Program Management Personnel Costs for the grant applicant distinguished from Direct or Indirect Administrative Costs?

A: Direct Administrative Costs, including those in the form of salaries, benefits, contractual costs, supplies, and data processing charges, are costs that are not included in the recipient's indirect cost pool and are necessary to comply with the provisions of the OMB Guidance for Federal Financial Assistance (formerly known as the Uniform Administrative Requirements for Cost Principles and Audit Requirements for Federal Awards) at 2 CFR Part 200. Additional information on administrative costs is included in the FAQs (see question O.2. and other FAQs under Section O).

Q: Should we include in-kind resources in our costs? Where should we show those?

A: If an applicant proposes to contribute leveraged resources to support or complement the grant, please describe those resources under 3.i. Project Implementation. In response to criterion 3.b. Cost Estimates, please only include costs to be covered by EPA grant funds. Leveraged resources (such as in-kind contributions) should not be included in response to 3.b. Cost Estimates or the budget table.

Q: What is the difference between a cost share and leveraged resources?

A: Voluntary committed cost sharing, as defined in 2 CFR 200.1, means cost sharing specifically pledged on a voluntary basis in the proposal's budget on the part of the recipient or subrecipient, which becomes a binding requirement of Federal award. See § 200.306. Note, a voluntary cost share will not be accepted under the FY25 Brownfields Grant competitions. Leveraged resources are generally when an applicant proposes to provide its own additional funds/resources or those from third-party sources (including another federal grant) beyond the EPA grant funds. Leveraged resources support or complement the project and are different from voluntary committed cost sharing. Examples include additional public or private funds or in-kind resources for assessment, remediation, and/or subsequent reuse

of the site. While leveraged resources are not legally binding, if applicants describe leveraged funds/resources, EPA expects applicants to make the effort to secure the leveraged resources described in their Narrative.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE QUESTIONS & ANSWERS – no questions were submitted for this criterion.