

On December 4, 2025, EPA’s Office of Brownfields & Land Revitalization held a live webinar to assist applicants with preparing the **Narrative portion** of their application for the Fiscal Year (FY) 2026 **Cleanup Grants**. Participants’ questions and EPA’s responses are included below. Note, responses may include additional information than what was provided during the webinar. This transcript (v2) was updated to include minor clarifications.

Note that **general application submission, the Application Information Sheet, and Threshold requirements** were covered in the recording 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 are seeking funding, please contact your Regional Brownfields Contact listed in Section 1.E. of the Guidelines. If you have questions on how to submit an application through [www.grants.gov](http://www.grants.gov), please visit the “APPLICANTS” tab on the grants.gov website for information.

GENERAL QUESTIONS & ANSWERS
<p><b>Q: Where can I find the recording and the presentation?</b></p> <p>A: A copy of the presentation and the webinar recording with closed captioning are available on the <a href="#">MARC Grant Application Resources – “Open Solicitations”</a> webpage (see Grant Guideline Outreach Webinars - Narrative Ranking Criteria).</p>
<p><b>Q: If a community has a cleanup need that is anticipated to be greater than \$500K but less than \$4M, which grant should they apply for, and will they be penalized if they don't utilize all of the grant funding if they opt for the higher amount?</b></p> <p>A: No, applicants who request less than the maximum amount of funding will not be penalized. For selection purposes, EPA will prepare two ranked lists of applications. One list will be comprised of applicants requesting up to \$500,000. EPA expects to select approximately 10 applications from this list. The second list will be comprised of applicants requesting between \$500,001 and \$4,000,000. EPA expects to select approximately 26 applications from the second list. For example, a request for \$1,000,000 will be categorized in the list of applications requesting between \$500,001 and \$4,000,000, and will not by default be evaluated less favorably based on the amount of funding requested.</p> <p>Note, under criterion 3.c. Cost Estimates, applicants will be evaluated on the extent to which they include cost estimates that are reasonable and realistic to implement the grant, so applicants should apply for a funding amount that they anticipate using.</p>
<p><b>Q: If an organization applies for a Cleanup Grant amount over \$500k and is not selected, can they be considered among the Cleanup Grant applications below \$500k?</b></p> <p>A: Cleanup Grant applicants will only be considered under one category or ranked list based on the amount of funding requested in their application (see the Q&amp;A above). Unsuccessful applications will not be considered under the other ranked list. In other words, if an application for \$1,000,000 is not selected from the list of applicants requesting up to</p>

\$4,000,000, that application will not be considered for a smaller award amount on the up to \$500,000 list.

**Q: What is the difference between the anticipated notification of selection date (June 2026) and the anticipated award notification (Sept 2026)?**

A: EPA anticipates announcing award selections in June 2026. The applicants that are selected for award will work with an EPA Project Officer to finalize the required federal application package, the proposed budget, and to negotiate the cooperative agreement workplan. The official notification of an award will be made by the authorized Award Official assigned to the cooperative agreement. Selection does not guarantee an award will be made. Awards are anticipated to be made around September 2026. See Section 7 of the Guidelines for more details.

**Q: Does the BABA requirement still apply? We're concerned the BABA requirement may impact future redevelopment of the land beyond the scope of work funded by the cleanup grant.**

A: BABA requirements are referenced in Section 7 of the Guidelines. If you have questions about Build America, Buy America (BABA) applicability and compliance, please contact [BABA-OLEM@epa.gov](mailto:BABA-OLEM@epa.gov) and cc: the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines. Further Agency resources regarding BABA are available here: <https://www.epa.gov/baba/build-america-buy-america-baba-epa-programs#land>.

**Q: Can you please advise on the project start date?**

A: Applicants are encouraged to use 10/01/2026 as the project start date. Please note that if you plan to use pre-award costs, the date may be different. See [FAQ](#) G.8. for details.

**Q: How are the “other” criteria factored into scoring and review?**

A: EPA’s Headquarters Selection Official may consider the other evaluation factors listed in Section 6.C.(1) of the Guidelines as appropriate when making final selections. Applicants should provide a summary in the Narrative on the applicable other factors and note the corresponding page number in the Application Information Sheet. Please see Section 6.C.(1) of the Cleanup Grants NOFO for more information.

**Q: Can the city consider applying for funding under separate needs? For example, planning for the reuse of an old, closed landfill, and a building/land hazardous substance material survey/resampling of soils under different opportunities?**

A: It depends. If you are interested in applying for multiple grants, please see the [FY26 Eligibility Chart for Multiple Applications](#). You can also contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines to answer specific eligibility questions or general competition questions.

**Q: Should we include letters of support from partnering organizations, or can letters of support from any entity (legislators, community members, etc.) be included in the submission?**

A: No, please do not include any letters of support. Any extraneous materials, including letters of support, will not be considered. The only letters that may be considered when

evaluating a Cleanup Grant application are documentation that substantiates secured commitments of leveraged funding for remediation or reuse of the proposed site(s) under Narrative criteria 1.f. Resources Needed for Site Remediation and 1.g. Resources Needed for Site Reuse, as applicable.

**Q: Since letters of support for Cleanup Grants were asked not to be attached since they will not be reviewed, is this the same for Coalition partners?**

A: Any extraneous materials, including letters of support, will not be considered. Note that Cleanup Grants are to be awarded to successful *individual* applicants; there is not a cleanup coalition grant option.

For Assessment Coalition Grants, each non-lead coalition member must submit a signed letter to the grant applicant (the lead coalition member) in which they agree to be part of the coalition. This is different from letters of support (e.g., from members of Congress, community members, etc.), which will not be reviewed. Please see the [MARC Grant Application Resources webpage](#) for applicant resources and specific information on Assessment Coalition Grants.

**Q: Is there a risk for small nonprofit institutions in applying? For example, if they are not selected, does the fact that they applied then subject them to federal oversight and potentially endanger their ability to continue to operate?**

A: No, if you are not selected for funding, there is no repercussion. Per Section 2.B. Threshold Criteria in the Guidelines, the information you submit will be used by EPA solely to make eligibility determinations for Brownfield Grants and is not legally binding for other purposes, including federal, State, or Tribal enforcement actions. If selected for funding, the information in your Narrative will be incorporated into the workplan, subject to any adjustments to clarify issues with carrying out the project's scope of work made during the post-selection negotiation process. The workplan is a legally binding document.

**Q: Is this a stand-alone grant opportunity, or can it be paired/added to a PPG (Performance Partnership Grant)?**

A: EPA's Brownfield Cleanup Grants are not eligible to be included in a PPG.

**Q: If they are not eligible to be added to a PPG, is it permissible to have it as a stand-alone alongside a PPG?**

A: Yes, having a PPG would not on its own preclude you from being eligible for an EPA Brownfields Grant. Please see EPA's website for more information on the 18 grant programs that have been determined as eligible for inclusion in a PPG:

<https://www.epa.gov/ocir/national-environmental-performance-partnership-system-nepps>.

**Q: Our formal organization name is different than the name we used for our State-funded Grant. What name should we use when submitting our application to EPA?**

A: Please use whatever organization title is on your eligibility documentation and/or registered under your grants.gov and sam.gov accounts and attached to your UEI. If you have a "dba (doing business as)" name, that is acceptable, however, please include your dba name, in addition to your formal organization title, in the Application Information Sheet.

## Grants.gov Submission/Federal Forms

**Q: Is the “Grants.gov Lobbying Form to be submitted by applicants requesting more than \$100,000 of EPA grant funding” required at the time of application submission? We are planning to apply for more than \$100,000 in EPA funding. If it's required, then where do I access this form?**

A: The Grants.gov Lobbying Form is not required at time of application submission, but applicants that are selected for funding will be required to provide the form before an award is made. The Grants.gov Lobbying Form is available on grants.gov [linked here](#) and in the application package when you go to apply.

## Cleanup Grants – General Questions/Eligibility

**Q: Must an applicant own the site before the application submission deadline, or is there any way to get an extension if the applicant is working to get ownership through the foreclosure of a brownfield?**

A: Yes, to be eligible to receive a Cleanup Grant, the applicant must own the site that is the subject of its Cleanup Grant application by January 28, 2026. EPA will not allow extensions of time to meet the site ownership requirement for Cleanup Grants.

**Q: Our town owns a former wire mill site. The previous developer divided the site into tax parcels. The Town received an EPA Cleanup Grant for cleanup on two of the parcels. Can we apply for a Cleanup Grant for the other parcels on the wire mill site?**

A: Yes, as long as the site in the previous Brownfields Cleanup Grant application did not include the other remaining parcels. An applicant may define a property with multiple parcels (or an area with a cluster of multiple properties) as a single site, or they may define each parcel/property as an individual site. Please see [FAQ L.10.](#) for details. Brownfield sites (or parcels) where EPA Cleanup Grant funds were previously expended may not receive additional EPA Cleanup Grant funding in FY26.

**Q: Are state-governed institutions of higher education eligible for these grants?**

A: Maybe. It depends on whether the state-governed institution qualifies as an eligible entity as described in Section 2.A. of the Guidelines. For instance, nonprofit colleges, universities, and other educational institutions may be considered “other nonprofit organizations,” which are an eligible entity type to apply for Brownfields Cleanup Grants. Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines. They can assist you with determining if your organization is eligible for funding.

**Q: The nonprofit I represent was newly created and the 501(c)(3) IRS determination letter will be pending at the time of application. Is our nonprofit eligible to apply for a Brownfield Cleanup Grant, and if approved, receive an award pending a final determination letter?**

A: No, your organization must be eligible for funding at the time of application submission and must attach all relevant eligibility documentation to the application submitted by the deadline.

**Q: The Guidelines indicate that a site would have to be sufficiently characterized for cleanup by June 15, 2026. Can Cleanup Grants cover the design phase of investigations? Or**

**would some level of investigation still be possible? Are there any parameters around the level of sufficiency for site characterization?**

A: There must be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2026, for the remediation work to begin on the site(s). Cleanup Grant funding is typically limited to only site-specific planning. General planning activities, such as those outlined in the [Planning Information Sheets](#), may be eligible only when the planning activity is closely tied to the cleanup decision for an individual brownfield site, such as if the planning activity is necessary to help determine the feasibility of site cleanup or reuse option(s) for redevelopment.

**Q: The Cleanup Guidelines state that sufficient site characterization should be complete by June 15, 2026. Can Cleanup Grant funding be used to conduct the additional site characterization?**

A: No, as stated in the answer above, Cleanup Grant funds are generally not eligible to be used for site assessment/characterization activities. Applicants selected for new Cleanup Grants that indicate in their application that additional assessment is needed to sufficiently characterize the site(s) for the planned cleanup may not use funds from the new Cleanup Grant to conduct the necessary work to demonstrate compliance with this requirement by June 15, 2026.

**Q: Is there any advantage to a 501(c)(3) applying on its own behalf vs. having the relevant local government unit apply for cleanup of the same site?**

A: No, there is no advantage, but Cleanup Grant applicants are required to own the site by the application deadline. If the local government owns the site, only the local government is eligible apply. If the 501(c)(3) owns the site, only the 501(c)(3) is eligible apply. If you think the 501(c)(3) is an instrumentality of the local government, please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines to confirm and clarify which entity may apply.

**Q: My organization would typically enter into a purchase agreement but would not actually take ownership and can secure site control and access for the duration of the grant period. Would this be sufficient to apply? Is there an alternative to owning the site outright?**

A: EPA may consider other arrangements to be the "functional equivalent of ownership" as discussed under threshold criterion 4 Site Ownership and in the accompanying [FAQs](#) (see Section L). These determinations are fact-specific and made on a case-by-case basis. Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines for further questions or to confirm eligibility.

**Q: Is a municipality eligible to apply for a 2026 Cleanup Grant if they are finishing up a 2022 Cleanup Grant now?**

A: Yes, if you have an open Cleanup Grant, you may apply for a FY26 Cleanup Grant for a site that has not previously received Cleanup Grant funding. Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines for eligibility questions.

**Q: Hawaiian Kanaka are not considered a “Tribe” but are already federally recognized. What is the policy & terminology used?**

A: The list of eligible entities in Section 2.A. of the Guidelines is governed by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §104(k)(1) and §104(k)(3) and [2 CFR § 200.1](#). Your organization may be eligible for a Cleanup Grant if it qualifies as one of the entity types listed in Section 2.A. of the Guidelines. Please contact your Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines if you have additional questions related to your entity type and eligibility.

**Q: I see that letters of support are not needed, but you do need a letter from the State agency in charge of approving the cleanup plan, correct?**

A: Yes, all Cleanup Grant applications must include a letter from the appropriate State or Tribal Environmental Authority, or proof that the letter was requested, by the application submission deadline. Note, if additional assessment is needed to sufficiently characterize the site(s), the applicant (i.e., no longer the State/Tribal Environmental Authority Letter) should include a statement to that effect in response to the threshold criteria and affirm that there will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2026.

State or Tribal Environmental Authority applicants must include a statement that there is a sufficient level of site characterization or affirm that there will be a sufficient level of characterization by June 15, 2026.

Please see threshold criterion 2.B.(9) for details and coordinate early with your State or Tribal Environmental Authority (or equivalent State or Tribal regulatory oversight authority) to allow adequate time for you to obtain the letter and include it with your application.

**Q: Do you need a letter from the State agency with environmental regulatory oversight of the site stating that all necessary assessment has been completed prior to submitting the Cleanup Grant Application?**

A: Yes, all Cleanup Grant applications must include a letter from the State or Tribal Environmental Authority, or proof that the letter was requested, by the application submission deadline. Note, if additional assessment is needed to sufficiently characterize the site(s), the applicant (i.e., no longer the State/Tribal Environmental Authority Letter) should include a statement to that effect in response to the threshold criteria and affirm that there will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2026.

State or Tribal Environmental Authority applicants must include a statement that there is a sufficient level of site characterization or affirm that there will be a sufficient level of characterization by June 15, 2026.

Please coordinate early with your State or Tribal Environmental Authority (or equivalent State or Tribal regulatory oversight authority) to allow adequate time for you to obtain the letter and include it with your application.

**Q: Is pre-application community engagement/review required?**



A: Yes, please see threshold criterion 14 Community Notification for the specific requirements. This is under Section 2.B.(14).

#### RLF Grants

**A solicitation for RLF Grants was not issued for the FY 2026 cycle.**

#### PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION QUESTIONS & ANSWERS

**Q: Does EPA have criteria to determine how feasible the reuse project is? For example, criteria about market studies, a developer project, etc.?**

A: No, there is not one specific criterion focused on the feasibility of reuse. Several Narrative criteria ask applicants to provide details on the reuse strategy or projected reuse, its alignment with local government's land use and revitalization plans or related community priorities, and resources that have been secured, sought, or will be sought to contribute to the reuse.

**Q: Do we have to have leveraged commitments at the time of application submission? How important is leveraged funding? Is it different from matching?**

A: Yes, to potentially receive full points for Narrative criteria 1.g. *Resources needed for Site Reuse*, leveraged commitments are required at the time of application submission. If the site requires additional resources for site remediation beyond the Cleanup Grant being applied for, leveraged commitments are also required for 1.f. *Resources needed for Site Remediation* to potentially receive full points. Under these two criteria, applicants are asked to attach documentation that substantiates secured commitments of leveraged funding for remediation and reuse of the proposed site(s). See the full Narrative criteria under Section 4.C. and the corresponding Review criteria under Section 6.B. for details.

Additional details on leveraging are available under Section 3.A.(5) of the Guidelines. Leveraging is different from cost share, which includes matching. Voluntary cost share will not be accepted under this competition.

**Q: I understand general partner letters of support will not be evaluated. If a potential project partner is not yet able to provide an exact amount of leveraged funds at the time of application, but does intend to provide some funding toward the project, can a letter stating such be included in the application package and evaluation?**

A: Yes, the letter can still be included. Please note that applicants are asked to attach documentation that substantiates secured commitments of leveraged funding for remediation and reuse of the proposed site(s). A response may only earn full points when the applicant has resources that are secured, significant, and relevant to the cleanup project. EPA expects applicants to make the effort to secure the leveraged resources described in their Narrative. If the proposed leveraging does not materialize during grant performance, then EPA may reconsider the legitimacy of the award and/or take other appropriate action as authorized by CERCLA § 104(k)(8)(C) and 2 CFR Parts 200 and 1500.

**Q: Does infrastructure include something like an irrigation system for a public park/garden?**

A: Yes, infrastructure may include utilities, roads, buildings, etc.

#### COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS & ANSWERS

**Q: Our target area is too small to get good data for the community need section. Do you have any suggestions?**

A: Applicants should provide whatever data is available that is relevant to their community. If data at a smaller geographic level is not available and you only have data at a larger geographic level (e.g., at a county level), you may explain that in your response.

**Q: Can a community be considered small if it is a small part of a larger political jurisdiction, such as the Target Area, limited to a neighborhood with a small population?**

A: EPA leaves it to the applicant to make their case as to why the community is small. There is no statutory definition of what constitutes a “small” population. However, the Brownfields Program considers communities of 10,000 people and less as “micro” communities, 15,000 people and less as “small” communities, 50,000 people and less as “rural,” and less than 100,000 people as “nonurban.” Communities with less than 50,000 in population may be considered small.

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

**Q: Are quotes from contractors required to be attached with the budget?**

A: No, contractors’ quotes are not required.

**Q: If additional funding is needed to complete remediation, would the costs for securing that funding be an eligible expense under the grant? For instance, would the costs of studies and fees related to creating and approving a tax increment financing district to pay the additional remediation costs (and for no other purpose) be an eligible grant expense?**

A: No, because the costs are not allocable to the grant nor necessary to carry out the grant.

**Q: Should multi-year project requests be consolidated to reflect the full project in a cost estimate table, or are multiple annual tables preferred?**

A: EPA does not require applicants to submit annual cost breakdowns as part of their applications and applicants may break out costs however works best for them. EPA has provided a sample budget table in the Guidelines to assist in organizing your response. In drafting your response, however, please be mindful of the page limit on the narrative (10 pages for Cleanup Grants). Note, all costs to be covered by EPA grant funds should be included in the budget in your application.



**Q: Is re-used equipment an eligible cost? For example, park equipment on a cleanup parking lot site?**

A: It depends on whether the re-used equipment is required for the cleanup of the site and/or otherwise necessary to carry out the grant. Cleanup Grant funds may be used for direct costs associated with remediating a brownfield site and programmatic management of the grant. Additional details on eligible costs are in Section 3.A.(2) of the Guidelines. Site reuse and post-cleanup redevelopment costs are not eligible costs. Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines for additional questions on eligible costs.

## **PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE QUESTIONS & ANSWERS**

**Q: Does the Past Performance Section apply for any awarded Brownfields grants, or just Cleanup Grants?**

A: The Past Performance and Accomplishments Narrative criteria are split into three categories:

1. Applicants who have received an EPA Brownfields Multipurpose Grant, Assessment Grant, Revolving Loan Fund Grant, Cleanup (MARC) Grant, and/or 128(a) Grant;
2. Applicants who have never received an EPA Brownfields MARC or 128(a) Grant but have received other federal or non-federal assistance agreements (including an EPA Area-Wide Planning Grant or Job Training Grant); and
3. Applicants who have never received any type of federal or non-federal financial assistance agreement, or who have recently received a financial assistance agreement, including a Brownfields Grant, but have not had the opportunity to demonstrate compliance with grant requirements.

Please respond to the appropriate category based on your organization's past experience.

**Q: Will State or philanthropical grants fall into group 2, other federal or non-federal assistance agreements?**

A: Likely yes, these types of grants would fall under "Other Federal or Non-Federal Financial Assistance Agreements." Note that not all kinds of assistance is considered being in receipt of a financial assistance agreement. For example, receiving technical assistance from Technical Assistance to Brownfields providers or an EPA or State-provided Targeted Brownfields Assessment would not be considered an "other federal or non-federal financial assistance agreement."

**Q: In cases where the applicant has received 128(a) support in the form of Phase I/II Environmental Site Assessment work from the state, should that be considered in (4)d.1 as "receiving an EPA grant?"**

A: No, your organization must have been the direct recipient of an EPA Brownfields MARC or 128(a) financial assistance agreement to respond under the "Currently Has or Previously

Received an EPA Brownfields Grant” category. Having received assistance from a State 128(a) program does not qualify as having received an EPA Grant.

**Q: This year, we received a Perfect Pitch award at the CALRC (California Land & Recycling Conference). Would this qualify under slide 56 for other federal or non-federal financial assistance agreements?**

A: No, based on the information provided, this would not qualify as being in receipt of other federal or non-federal financial assistance agreements. To respond in the affirmative, your organization must have been the direct recipient of an EPA Brownfields MARC or 128(a) financial assistance agreement to respond under the “Currently Has or Previously Received an EPA Brownfields Grant” category, or have received another kind of federally or non-federally funded financial assistance agreement to respond to the “Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Financial Assistance Agreements” category. EPA’s TAB Providers, like CCLR, provide free technical assistance to communities with brownfield challenges. TAB Provider assistance is not considered a financial assistance agreement.

**Q: Does having previous Brownfields Grants affect our scoring?**

A: Yes, applicants with a previous Brownfields Grant may respond to Narrative criterion 4.d. Currently Has or Previously Received an EPA Brownfields Grant and may disregard criteria 4.e. and 4.f.