

## Summary of FY15 Brownfields Assessment and Cleanup (AC) Grant Guidelines Changes

Area	FY14 ARC Guidelines	FY15 AC Guidelines
<b>ASSESSMENT AND CLEANUP PROPOSALS</b>		
<b>General Information</b>		
Revolving Loan Fund Grants	Revolving Loan Fund grants were available during the FY14 competition.	All references to the availability of RLF funds is deleted and the following statement is on page 1 of the Guidelines:  “A solicitation for new Revolving Loan Fund Grants will not be issued in FY15. EPA expects to solicit requests from existing, high performing RLF grantees through a Federal Register notice for supplemental RLF funding in early 2015.”
ASTM Standard	Phase I assessments were required to be performed in accordance with ASTM E1527-05.	All statements regarding Phase I assessments being performed in accordance with ASTM E1527-05 now reference the ASTM E1527-13 standard.
Policy and Competition References		In accordance with Agency policy, language has been inserted in Sections IV and VI to incorporate existing and additional provisions by reference. The full text of those provisions incorporated by reference have been deleted throughout the Guidelines.
<b>Proposal Submission Information</b>		
Proposal Content		Section IV.C is re-organized to more clearly identify the main proposal components.
Proposal Submission	Applicants were required to submit one copy of the complete proposal to EMS.	<i>Regions will receive a second copy of the applicant's proposal and may begin Threshold review immediately.</i>  Applicants are required to submit two copies of the complete proposal: one copy to EMS or through <a href="http://www.grants.gov">www.grants.gov</a> , and one copy to the Regional Brownfields Contact (listed in Section VII of the Guidelines).

Solicitation Clause	<p>IV.J Pre-proposal/Application Assistance and Communications stated:</p> <p>“However, consistent with the provisions in the announcement, EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the proposal, and requests for clarification about the announcement. In addition, if necessary, EPA may clarify threshold eligibility issues with applicants prior to making an eligibility determination.”</p>	<p><i>Revised language per the updated Competition Solicitation Clause:</i></p> <p>“However, consistent with the provisions in the announcement, EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the proposal, and requests for clarification about any of the language or provisions in the announcement. <b>Please note that applicants should raise any questions they may have about the solicitation language to the contact identified in Section VII as soon as possible so that any questions about the solicitation language may be resolved prior to submitting a proposal.</b> In addition, if necessary, EPA may clarify threshold eligibility issues with applicants prior to making an eligibility determination.”</p>
Other Factors & Other Factors Checklist	<p><i>Additional considerations are added to the “Other Factors” list and “Other Factors Checklist”. The ‘Climate Change’ other factor is deleted. Updated list is consistent with “Other Factors” outlined in the Area-Wide Planning and Environmental Workforce Development &amp; Job Training solicitations.</i></p> <p>“Community experienced manufacturing plant/<b>power plant</b> closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant/<b>power plant</b> closures due to bankruptcy or economic disruptions.”</p> <p>“Recent (2008 or later) significant economic disruption (<u>unrelated</u> to a natural disaster or manufacturing/auto plant/<b>power plant closure</b>) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.”</p> <p>“Applicant is one of the 12 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, <b>applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation</b> which demonstrate either designation as one of the 12 recipients, or relevant pages from a recipient’s IMCP proposal</p>	

	<p>which lists/describes the core partners and implementation strategy parties. A core partner/implementation strategy party is a local partner organization/jurisdiction that will carry out the proposed strategy, as demonstrated in letters of commitment or memoranda of understanding which documents their contributions, roles, and responsibilities to the partnership. EDA may provide to EPA a list of the core partners/implementation strategy parties for each of the 12 “manufacturing community” designees, which EPA would use to verify this other factor.”</p> <p>“Applicant will serve an area designated as a federal, state, or local Empowerment Zone or Renewal Community. To be considered, <b>applicant must attach documentation</b> which demonstrates this current designation.”</p> <p>“Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project area, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. <b>Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc.</b> To be considered, <b>applicant must attach documentation.</b>”</p> <p>“Applicant is a HUD Promise Zone community. To be considered, <b>applicant must attach documentation.</b>”</p>	
Threshold and Ranking Criteria		
Community Need – Introductory Paragraph	<p>FY14 Guideline language stated:</p> <p>“<u>All proposals</u> should demonstrate that the grant will serve a community with a need to address or facilitate the identification and reduction of threats to the health or welfare of children, pregnant women, minority or low-income communities, or other sensitive populations; <u>and/or</u> will serve a community that have an inability to draw on other sources of funding because of, for example, their small population or the low income of the community.”</p>	<p><i>Revised language is consistent with the Brownfields Law and clarifies that applicants must responds each criterion (1.b: Impacts on Targeted Community and 1.c: Economic Conditions). Additionally, revised language emphasizes that EPA anticipates selecting and funding proposal that demonstrate high community need.</i></p> <p>“<u>All proposals</u> should demonstrate that the grant will serve a community with a need to address or facilitate the identification and reduction of threats to the health or welfare of children, pregnant women, minority or low-income communities, or other sensitive populations; <b>and</b> will serve a community that have an inability to draw on other sources of funding because of, for example, their small population or the low income of the community.</p>

		EPA anticipates selecting proposals which demonstrate that the identified targeted community(ies) experience significant socio-economic challenges (e.g., high percent low-income, high percent poverty, increased health disparities) and where the assessment/cleanup could be an anchor of transformation for the community(ies)."
Community Need - Demographic Table		<p><i>Updated data are consistent with the demographic table in the Area-Wide Planning and Environmental Workforce Development &amp; Job Training solicitations.</i></p> <p>Updated data values and citations for 'unemployment', 'poverty rate' and 'median household income.'</p>
Community Need – Cumulative Environmental Issues and Impacts on Targeted Community		<i>Added language clarifies that applicants are not required to develop new studies in order to respond to the criteria. Any information discussed and/or cited should reference existing available studies and data.</i>
Community Engagement & Partnerships	<p>FY14 Assessment Guideline language stated: "Describe your plans for communicating progress of your project, addressing the needs of the targeted community, to community members. The description should include a discussion of why the plans identified are appropriate for the targeted community."</p> <p>FY14 Cleanup Guideline language stated: "Describe your plan for communicating the progress of your project to citizens, addressing the needs of the targeted community discussed under Community Need."</p>	<p><i>Language for Communicating Progress is revised to more accurately describe what information should be included in the applicant's response.</i></p> <p>"Describe your plans for communicating the progress of your project to community members. Also, describe how the identified communication plans are appropriate and effective for the targeted community(ies)."</p>
Community Engagement & Partnerships	FY14 Guidelines required applicants to attach Letters of Support from community organizations that affirmed their role and commitment to the proposed project. Also included a statement that the numbers of partners was not as important as the contributions of their organization.	<p><i>Revised language more accurately reflects the level of involvement community organizations should have in the applicant's project.</i></p> <p>FY15 Guidelines required applicants to attach <b>Letters of Commitment</b> from community organizations that affirmed</p>

		their role and commitment to the proposed project. Also, the numbers of partners is not as important as the contributions <b>and the relevance</b> of their organization.
Project Benefits	<p>4.a. Health and/or Welfare and Environment was written as one criterion worth 10 points.</p> <p>“Describe the health and/or welfare and environmental benefits anticipated from this grant (or broader project). Describe how these benefits will address the health and/or welfare challenges in the Community Need section (Section V.B.1).”</p>	<p><i>Revised language requires applicants to provide the same information as in FY14, however the criterion is divided into two subcriteria; each worth 5 points.</i></p> <p>i. <u>“Health and/or Welfare Benefits (5 points)</u> Describe the health and/or welfare benefits anticipated from this grant (or broader project), and how these benefits will address the health and/or welfare challenges discussed in the Community Need section of your narrative (Section V.B.1.).</p> <p>ii. <u>Environmental Benefits (5 points)</u> Describe the environmental benefits anticipated from this grant (or broader project), and how these benefits will address the environmental challenges discussed in the Community Need section of your narrative (Section V.B.1.).”</p>
Project Benefits	<p>FY14 Guideline language for criterion 4.b.ii. Environmental Benefits from Infrastructure/Sustainable Reuse stated:</p> <p>“Provide one example of efforts you have taken in your planning to integrate equitable development or livability principles for cleanup and revitalization of brownfields, such as improved transportation choices, affordable housing, and other considerations as described in these guidelines.”</p>	<p><i>Revised language requires applicants to provide the same information as in FY14, however the sentence is restructured to clarify what EPA expects in an applicant’s response.</i></p> <p>“Describe how your approach to address and revitalize brownfield sites will incorporate equitable development practices or livability principles; such as improved transportation choices, affordable housing, and other considerations as described in these guidelines.”</p>

Project Benefits	4.b.ii. subtitle in Assessment Guidelines: n/a 4.b.ii. subtitle in Cleanup Guidelines: <b>Example of Effort</b>	<i>Revised 4.b.ii subtitle in Assessment and Cleanup Guidelines are consistent: <b>Integrating Equitable Development or Livability Principles</b></i>
	4.c.i. subtitle in Assessment Guidelines: <b>Economic or non-Economic Benefits (long-term)</b>  4.c.i. subtitle in Cleanup Guidelines: <b>Economic and Community Benefits</b>	<i>Revised 4.c.ii. subtitle in Assessment Guidelines is consistent with Cleanup Guidelines: <b>Economic and Community Benefits</b></i>
Programmatic Capability/ Past Performance	FY14 Guideline language stated:  “If you have ever received an EPA brownfields grant, please respond to <b>item i.</b> ”	<i>Additional language clarifies that applicants who have received 128(a) funding should respond to item i.</i>  “If you have ever received an EPA brownfields grant (including 128(a) grants), please respond to <b>item i</b> below.”
	FY14 Guideline language stated:  “If you have never received an EPA brownfields, but have received other federal or non-federal assistance agreements (an assistance agreement is a grant or cooperative agreement, but not a contract) please respond to <b>item ii.</b> ”	<i>Additional language clarifies that applicants who have only received TBA funding should respond to item ii.</i>  “If you have never received an EPA brownfields, but have received other federal or non-federal assistance agreements (an assistance agreement is a grant or cooperative agreement, but not a contract (e.g., Targeted Brownfields Assessment grants of services)) please respond to <b>item ii.</b> below.”
<b>ASSESSMENT PROPSOALS</b>		
<b>Proposal Ranking and Selection</b>		
Ranked Lists of Eligible Proposals	Selected highest ranking proposals using two lists – one list of new applicants that have never received a post-law Brownfields grant and a second list of “existing” brownfields grantees.	<i>Revised language redefines how ‘new’ and ‘existing/recent recipient’ applicants are characterized.</i>  “For evaluation and selection purposes, EPA’s Office of Brownfields and Land Revitalization (OBLR) will prepare two ranked lists of eligible proposals. One list will be comprised of “new applicants” for brownfield agreements defined as:

		<ul style="list-style-type: none"> <li>• applicants who have never received an EPA brownfields grant, or</li> <li>• applicants who were awarded a brownfields grant that closed in 2007 or earlier.</li> </ul> <p>A second list will be comprised of “existing and recent recipients” defined as:</p> <ul style="list-style-type: none"> <li>• applicants who have a current brownfields grant, or</li> <li>• applicants who were awarded a brownfields grant that closed in 2008 or later.”</li> </ul>
Threshold and Ranking		
Applicant Eligibility	Applicants who were awarded an assessment grant in FY13 were not eligible to apply for FY14 assessment funding.	Applicants who were awarded an assessment grant in FY14 <b>ARE</b> eligible to apply for FY15 assessment funding.
Project Description	<p>FY14 Assessment Guideline language stated:</p> <p>“Describe the project management approach which will be used to ensure completion within 3 years (address timing of contractor procurement, site selection, and site access).”</p>	<p><i>Revised language better articulates the information that should be included in applicant responses.</i></p> <p><u>“Project Timing (5 points)</u> Describe your approach for implementing and executing key project activities within the three year period of performance. Specifically address the timing of key project activities (including contractor procurement, site selection, and securing site access) and state who will be responsible for implementing/completing those activities.”</p>
Community Engagement & Partnerships		<p><i>Expanded introductory paragraph provides additional guidance how responses to the criteria will be evaluated.</i></p> <p>“Proposals will be evaluated on the quality and extent to which they:</p> <ul style="list-style-type: none"> <li>- demonstrate actions or plans to effectively involve and inform the targeted community and relevant stakeholders;</li> </ul>

		<ul style="list-style-type: none"> <li>- identify the relevancy of the local/state/tribal environmental authority to the project;</li> <li>- identify roles of other relevant governmental partnerships; and</li> <li>- identify the relevant roles of community organizations and affirm their involvement in the project through commitment letters.”</li> </ul>
Community Engagement & Partnerships	3.a. Plan for Involving Targeted Community & Other Stakeholders; and Community Project plans was written as one criterion worth 15 points.	<p><i>Revised language requires applicants to provide the same information as in FY14, however the criterion is divided into two subcriteria:</i></p> <ul style="list-style-type: none"> <li>i. <u>Community Involvement Plan (10 points)</u></li> <li>ii. <u>Communicating Progress (5 points)</u></li> </ul>
Community Engagement & Partnerships	<p>The 3.b. Partnerships with Government Agencies criterion stated:</p> <p>“Describe your current efforts and plans to initiate and develop new, or to access existing, partnerships with the following governmental entities, including a description of the role they would play to ensure your brownfields project is successful:</p> <ul style="list-style-type: none"> <li>i. your local/state/tribal environmental as applicable to your state and local procedures – please briefly explain your local environmental oversight structure (5 Points)</li> </ul>	<p><i>Revised language more accurately reflects the partnerships that should be established. In addition, revised language clarifies that applicants must only describe their partnership with a ‘health agency’ when the health agency is the environmental authority or when the health agency is relevant to the project goals and activities.</i></p> <p>“Describe your current efforts and plans to initiate and develop new partnerships <b>or</b> to develop your existing partnerships with relevant governmental entities; including a description of the role they would play to ensure your brownfields project is successful.</p> <ul style="list-style-type: none"> <li>i. <u>Local/State/Tribal Environmental Authority (5 points)</u> Please identify and provide information on the agency which runs the relevant brownfields, voluntary or other similar cleanup program at the local/state/tribal level (i.e., the environmental agency and/or health agency).</li> </ul>

	ii. other relevant, state, and local governmental agencies (5 points)	ii. <u>Other Relevant Governmental Partnerships (5 points)</u> Identify and provide information on other relevant federal, state, and/or local governmental agencies with which you will partner during your assessment project (e.g., EPA, DOT, HUD, a health agency)."
Point Distribution	Community Need – 22% Project Description & Feasibility Success – 25% Community Engagement & Partnerships – 18% Project Benefits – 15% Programmatic Capability – 20%	Community Need – 25% Project Description & Feasibility Success – 25% Community Engagement & Partnerships – 17% Project Benefits – 13% Programmatic Capability – 20%
<b>CLEANUP PROPSOALS</b>		
<b>Funding Opportunity Description</b>		
Description of Grant – Site Ownership	FY14 Cleanup Guidelines language stated:  "For the purposes of eligibility determinations in these guidelines only, the term "own" means fee simple title through a legal document for example a recorded deed."	<i>Revised language is consistent with current program policy and is consistent with the Cleanup and RLF Terms &amp; Conditions.</i>  "For the purposes of eligibility determinations in these guidelines only, the term "own" means fee simple title through a legal document (for example a recorded deed); unless EPA approves a different ownership arrangement."
<b>Threshold and Ranking Criteria</b>		
Community Need	1.b. Impacts on the Targeted Community stated:  "Discuss the impacts the brownfields have on public health and/or welfare and environment of your targeted community."  "Describe how the property that will be cleaned up under this grant contributes to adverse impacts to the community."	<i>Revised language requires applicants to provide the same information as in FY14, however the sentences are re-structured.</i>  "Discuss how the brownfields have impacted the target community's public health and/or welfare, and their environment."  "Describe how the property that will be cleaned up under this grant adversely impacts the community."

<p>Community Engagement &amp; Partnerships</p>		<p><i>Expanded introductory paragraph provides additional guidance how responses to the criteria will be evaluated.</i></p> <p>“Proposal will be evaluated on the quality and extent to which they:</p> <ul style="list-style-type: none"> <li>- demonstrate actions or plans to effectively involve and inform the community groups or representatives directly affected by the site, as well as other relevant stakeholders;</li> <li>- identify how partnership with the state/tribal environmental authority will ensure the cleanup is protective of human health and the environment, or if not applicable, explains demonstrates how they will ensure the cleanup is protective;</li> <li>- identify roles for other relevant governmental partnerships, including health agencies if applicable; and</li> <li>- identify the relevant roles of community organizations and affirms their involvement to the project through commitment letters.”</li> </ul>
<p>Community Engagement &amp; Partnerships</p>	<p>The 3.b. Partnerships with Government Agencies stated:</p> <p>“Identify which agency or agencies are anticipated to have regulatory jurisdiction over your cleanup and discuss the roles they may have in ensuring your cleanup meets applicable standards or otherwise is protective of human health and the environment. Discuss the roles that state or local health agencies may play in your project or explain</p>	<p><i>Revised language more accurately reflects the partnerships that should be established. In addition, revised language clarifies that applicants must only describe their partnership with a ‘health agency’ when the health agency is the environmental authority or when the health agency is relevant to the project goals and activities.</i></p> <p>“Identify which agency (or agencies) implement(s) the state or tribal environmental brownfield program, and discuss the roles they may have in ensuring your cleanup meets applicable standards or otherwise is protective of human</p>

	why health agency involvement would not be applicable to your project.”	health and the environment. If applicable, discuss the roles the state or local health agencies may play in your project.”
Point Distribution	<p>Community Need – 15%</p> <p>Project Description &amp; Feasibility of Success – 30%</p> <p>Community Engagement &amp; Partnership – 15%</p> <p>Project Benefits – 20%</p> <p>Programmatic Capability – 20%</p>	<p>Community Need – 19%</p> <p>Project Description &amp; Feasibility of Success – 29%</p> <p>Community Engagement &amp; Partnerships – 14%</p> <p>Project Benefits – 19%</p> <p>Programmatic Capability – 19%</p>