



EPA Region 4 Brownfields Teleconference: Understanding the **FY 2013 ARC** Grant Proposal Guidelines

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August 2012



***Threshold Criteria and
Ranking Criteria #1: Community Need
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Brownfields ARC Grant Proposal Guidelines

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- Proposal Guidelines for FY 2013 ARC Grants and Frequently Asked Questions (FAQs) can be at are posted to the EPA Brownfields website at:
 - <http://www.epa.gov/brownfields/applicat.htm>
- ❖ **This training is *NO SUBSTITUTE* for reading and closely following the detailed Guidelines!**



FY12 ARC Timeline

- August 20?, 2012: Guidelines available
- October 25?, 2012: **Proposals Due**
- Spring 2013: Awards Announced
- May - June 2013: Work Plans and Grant Paperwork Submitted
- October 1, 2013: Funds Available



Brownfields Competitive Grant Program⁴

*EPA Brownfields ARC grants are very competitive. Applicants should be prepared to put time and effort into constructing a winning proposal. Are you really **READY**?*

We're looking for grantees who want to create a long-term community Brownfields program.





Agenda

- Summary of Grant Types
- Overview of Threshold Criteria
- Overview of Ranking Criteria #1: Community Need
- Tips & Resources



Assessment Applicant Options

To inventory, characterize, assess and conduct planning and community involvement related to brownfields sites.

Community Wide	Site Specific	Coalitions
Up to \$200,000 for hazardous substances <i>and</i> \$200,000 for petroleum addressing the same community.	Up to \$200,000 for petroleum <i>or</i> hazardous substances (comingled)	Up to \$ 600,000 per coalition. <i>Coalition Members can NOT apply for individual assessment funding.</i>
	May request a waiver for up to \$350,000	Required to assess a minimum of 5 sites.
Maximum Combined Amount \$400,000	Maximum Amount \$350,000	Maximum Amount \$ 600,000



Overview of ARC Threshold Criteria

Rock Hill (SC) Benefited from Brownfields Assessment Grant (2003) and Cleanup Grant (2005)





Threshold Criteria – Must Pass

Assessment Grant	Revolving Loan Fund Grant	Cleanup Grant
1. Applicant Eligibility	1. Applicant Eligibility	1. Applicant Eligibility
2. Letter From the State or Tribal Environmental Authority	2. Letter From the State or Tribal Environmental Authority	2. Letter From the State or Tribal Environmental Authority
3. Site Eligibility and Property Ownership Eligibility (Site Specific Proposal)	3. Description of Jurisdiction	3. Site Eligibility and Property Ownership Eligibility
	4. Oversight Structure and Legal Authority to Manage a Revolving Loan Fund	4. Cleanup Authority and Oversight Structure
	5. 20 % Cost Share	5. 20% Cost Share
		6. Community Notification

**Responses to Threshold Criteria are an attachment to Proposal*



Threshold Criteria

Site and Property Ownership Eligibility

(Site-Specific Assessment and Cleanup Applicants Only)

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1. Site Eligibility (Must meet definition of Brownfields)
2. Liability Exemptions/Defenses (AAI Must be conducted within 6 months of application)
 - Bona Fide Prospective Purchaser
 - Innocent Landowner
 - Contiguous Property Owner
3. Cleanup Applicants (Must have a written ASTM E1903-11 Phase II ESA Report completed-**Please provide Date of Report**) and draft ABCA



Threshold Criteria

Cost Share (Cleanup and RLF Only)

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- Cleanup and RLF **Grant Recipients** 20% cost share: (e.g., \$200,000 Grant has \$40,000 Match)
 - The cost share may be in the form of a contribution of money, labor, material, or services from a **non-federal source**.
 - If contribution is labor, materials or other services, it must be incurred for an eligible and allowable expense.
- Hardship Waivers for Cost Share Can Be Requested (**Submit on separate page, titled “Hardship Waiver Request”**)
- Cost Share Can Be Passed To Borrower (RLF Only)



Threshold Criteria

Legal Authority, Oversight Structure and Jurisdiction (Cleanup and RLF Applicants Only)

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- **Cleanup Oversight (Cleanup and RLF Applicants):**
 - Describe how you will oversee the cleanup at the site. Indicate whether you plan to enroll in a state or tribal voluntary response program.
- **Property(s) Access Plan (Cleanup only)**
 - Provide your plan to obtain access to adjacent or neighboring properties, if necessary.
- **Legal Opinion (RLF only)**
 - One Letter From Applicant's Counsel
 - (a) Legal Authority to Access & Secure Sites, and (b) Legal Authority to Manage Revolving Loan Fund (e.g. Hold Funds, Make Loans, Enter Into Loans, & Collect Repayment)



Coalition applicants (RLF only) must clearly define jurisdictional boundaries and must have the broader jurisdiction, authority, and program capacity to ensure adequate program performance of coalition members, borrowers, and/or subgrantees, if warranted.



Threshold Criteria

Community Notification (Cleanup Applicants Only)

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1. Cleanup Applicants Only must provide the community with notice of its intent to apply for an EPA brownfields grant and an opportunity to submit comments.
 - **Specifically, You Must:**
 - ✓ Place an ad (or equivalent)
 - ✓ Indicate that a copy of the draft grant proposal is available for public review and comment by stating in your ad where it is located (e.g. town hall library, website).
 - ✓ Indicate clearly that you will accept comments on the draft proposal.
 - ✓ Announce the date and time of a public meeting that you must hold prior to proposal submission.
2. Include a Draft ABCA (See FAQ # 71 for Contents)-**Must be made available for public review/comments by NLT October XX??., 2012** (see guidelines for date).
3. Community Notification Ad and Meeting (Must be current)
Consider attaching notice of meeting and draft ABCA to proposal.



Threshold Criteria Summary

Requirement	Grant Type		
	Assessment	RLF	Cleanup
1) Applicant Eligibility	X	X	X
2) Letter from State or Tribal Authority	X	X	X
3) Site/Property Ownership Criteria	Site specific only		X
4) Cost Share		X	X
5) Legal Authority to Manage an RLF		X	
6) Cleanup Authority and Oversight Structure		X	X
7) Description of Jurisdiction		X	
8) Community Notification Draft ABCA			X



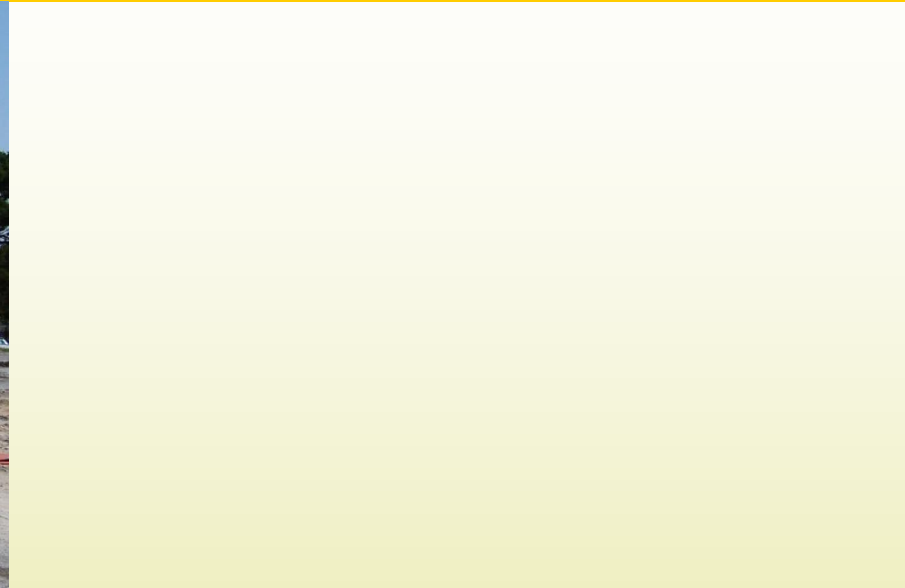
Threshold Criteria – Start Now

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- Contact EPA with eligibility questions **NOW**.
 - **Phil Vorsatz 404/562-8789**
- Request State/Tribe letters **early**.
- If applying for petroleum, contact State for site eligibility determination **early**.
- Before submittal, look at the checklist in each proposal type guideline to ensure that you have included all the required documents in your package!
- *For Cleanup only* - set up public meeting and get meaningful public input.



Ranking Criteria #1: Community Need





Ranking Criteria

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- Proposal must have passed the “Threshold Criteria” to be “Ranked.”
- 4 Ranking Criteria Sections for ARC Applicants:
 1. Community Need
 2. Project Description and Feasibility of Success
 3. Community Engagement and Partnerships
 4. Project Benefits
- Each Criteria has Subcriteria





Ranking Criteria

1. Community Need

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Points: A:40, R:15, C:15

- Community Need - Under this criterion, all ARC proposals have 2 subcriteria:
 - Health, Welfare, and Environment
 - Financial Need





Ranking Criteria

Community Need – 1a. Health, Welfare and Environment

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- Health, Welfare, and Environment *Provide information on the number and size (range) of the brownfields and the health, welfare, and environmental impacts of these sites in your targeted community.*
- Describe community/target community's history. (Tell a story)
- Describe actual sites to the extent possible (Data chart: number, size, type of contamination – including petroleum).
- Describe health/welfare impacts of sites to community (consider anecdotal information: trespass, illegal use, exposure pathway; connect target community to sites).
- Describe environmental impacts/risks of sites.





Ranking Criteria

Community Need – 1a. Health, Welfare and Environment, con't

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- Describe sensitive population in community (demographic data: minorities, children, the elderly, women of child-bearing age, etc.)
- Describe cumulative environmental impact of contamination on your community (anecdotal information: landfills, Superfund/RCRA sites, chemical plants, major highways, etc.)
- Describe disproportionate impact to sensitive pop. (work with health department to describe health data)







Ranking Criteria

Community Need – 1b. Financial Need

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- **Financial Need** - Describe the economic impact of brownfields on the targeted community/Demonstrate the economic needs of the targeted community's residents. **DO NOT use the Chamber of Commerce version of the community!**
- **Provide table specifically outlined in the proposal guidelines**
 - Population
 - Unemployment
 - Poverty Rate
 - Percent Minority
 - Per Capita Income
 - Compare to State and National Data
- Discuss the impact of closed factories, i.e. number of jobs lost, property tax impacts, etc.
-  Explain why other financial resources of the applicant are not available (fiscal condition, population size, natural disasters, etc .). What's happened to your budget as a result of economic impacts?
-  If you already have a brownfields grant explain why you need additional funding.





Community Need Tips

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- Community Need works with Project Benefits
- A strong proposal beginning can be the rising tide that floats subsequent sections (first impressions count!)
- Use the comparative demographics chart provided in the guidelines.
- Be sure to link the target community to the sites as well as provide health data showing impacts from cumulative environment/lifestyle issues.
- Accommodate both the detailed reviewer and the big picture reviewer.
- Exceed criteria. ex: strategic planning



Strength Comments

There has been clear impact on the community beyond their control, through the multiple issues of loss of industry to global competition, flooding from Hurricane Katrina, and impacts from the BP oil spill. Grantee gave clear info on sensitive populations and the fact that MS ranks last in the US in overall health.

Description of historical brownfield sources discussed. Effects of brownfields discussed. Numbers and sizes discussed. Specific list of targeted brownfields researched and provided. Infrastructure to address brownfield projects in place with past successes. Sensitive populations identified with significant data and comparative data provided. Nice data citations. Plans focused on specific minority based neighborhood. Plans are focused.

The proposal very clearly and in detail shows connections between brownfields in the target area and declining quality of life for residents, potential health and environmental concerns from known and suspected contamination, and ongoing economic problems for the city. Water quality is discussed in detail with respect to streams, surface runoff and threats to a public water supply. A large minority population is indicated in the data presented as well as a large segment of the city's population that does not speak much English.



Weakness Comments

While there is demonstrated knowledge of the potential health impacts of the typical contaminants found on brownfield sites in the city, they could have made a clearer connection between the sites identified for brownfields funding in each of the three targeted areas and the impacts they have on health, welfare and environment. i.e. - what is their proximity to residents, waterbodies, schools, etc. is there an issue with blight, crime and/or adjacent property values? However, some of this information is inferred/taken from other sections.

-the percentages of sensitive populations are stated, but there are not any statistics shown in comparison for state or national to demonstrate that the city contains more or less than typical numbers of any of these populations-health stats are not compared to typical rates as well. a discussion of the environmental and health effects of known contaminants would really help. For example creosote is a known carcinogen. Proposal could also discuss typical contaminants found at a rail depot, shooting range, petroleum related businesses

- The proposal discusses local plant closures, but does not directly address the health, welfare and env concerns associated with these specific properties- Also discusses potential health effects of dry cleaner sites, even though dry cleaners are not listed as one of their potential BF sites



Other Resources

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1. <http://epa.gov/brownfields/applicat.htm> for guidelines and FAQs
2. <https://www.tabez.org> assistance with grant writing (note: currently reflects 2012 guidelines-be sure the criteria is up-to-date)
3. <http://www.epa.gov/region4/rcra/bflr/index.html> EPA Region 4's Brownfields team
4. <http://clu-in.org/live/archive/> search for “brownfields” or “brownfields guidelines” to find training sessions/information from other Regional offices
5. http://epa.gov/brownfields/proposal_guides/FY12-Assessment-Guideline-Checklist.pdf checklist of items and content from 2012 guidelines