



FY25 CLEANUP GRANT CHECKLIST

Purpose

This checklist is provided for grant applicants and reviewers to help in the drafting and review of EPA Brownfields Cleanup Grants for the FY25 guidelines released in September 2024. The checklist is based on those guidelines and focuses on the Narrative Ranking Criteria that are outlined in detail on pages 41-52. Additional tips what makes a strong response in each section are included in italics after the associated checklist.

1. Project Area Description and Plans for Revitalization (55 Points)

• 1. a. Target Area and Brownfields (15 points)

• 1.a.i. Overview of Brownfield Challenges and Target Area (5 points)

	Are brownfield challenges are clearly discussed?
	Does section include a brief overview of how this grant will address those challenges and impacts?
	Are the specific target areas identified and well described?

• 1.a.ii. Description of the Proposed Brownfield Site (10 points)

	Are the site conditions, including structures well described?
	Are the contaminations well described?
	Are the past and current land uses well described?

Strong Applications will:

- *Clearly describe the challenges of the community(ies)*
- *Present well-defined target areas that are within the geographic boundaries impacted by this application.*
- *Provide quantitative data regarding amount of contamination present above levels of concern and the volume of media associated with said contamination.*

- **1. b. Revitalization of the Target Area (20 points)**
 - 1.b.i. Reuse Strategy and Alignment with Revitalization Plans (10 points)

	Is the reuse strategy or project reuse described in detail?
	Does the section reference local land use and revitalization plans or related community priorities and how the site(s) reuse aligns with those plans?
	If site is in flood plain, does description include how the reuse strategy will take that into account?
	Is there a thorough description of how the public, including underserved communities ¹ , were involved in the development of the reuse strategy?

Strong Applications will:

- *Clearly demonstrate alignment with local redevelopment plans and priorities*
- *Clearly describe the reuse strategy and how it takes into account any challenges, such as flood plain areas.*
- *Demonstrate strong efforts to solicit and include community input in redevelopment planning.*

- 1.b.ii. Outcomes and Benefits of Reuse Strategies (10 points)

	Does the section describe how the project or revitalization plan will stimulate economic development <u>and/or</u> facilitate the creation/preservation/addition of park, greenway, undeveloped property, recreational property, or other nonprofit use of property?
	Does the section describe how the proposed project will improve local climate adaptation/mitigation ² capacity and resilience to protect residents and community investments?
	If applicable, does the section describe how the reuse will facilitate renewable energy or incorporate energy efficiency measures.

¹ EPA defines underserved communities as “populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life as exemplified in the preceding definition of equity.” (page 9 of Cleanup Guidelines)

² EPA defines climate change as changes in global or regional climate patterns attributed largely to human-caused increased levels of atmospheric greenhouse gases. Climate adaptation means taking action to prepare for and adjust to both the current and projected impacts of climate change. Climate change mitigation refers to actions limiting the magnitude and rate of future climate change by reducing greenhouse gas emissions and/or advancing nature-based solutions. For more information, please visit www.epa.gov/climate-adaptation/climate-adaptation-and-epas-role.

Strong Applications will:

- *Clearly describe benefits and outcomes of the reuse strategy, whether economic development or other use for the public good.*
- *Clearly demonstrate how the project will improve climate adaptation or mitigation.*

- **1. c. Strategy for Leveraging Resources (20 points)**

Tips for this section:

- *Responses for this section may only earn full points when applicant has resources that are secured, significant, relevant, and sufficient to complete the remediation.*
- *Be careful not to duplicate sources that are listed in 3. Description of Tasks/Activities and Outputs.*
- *Be sure to think big- If it isn't clear that funding is secured and will bring the site to completion, then responses will not receive full points.*
- *Ensure that any attachments support/reaffirm information presented in the narrative and do not supplement deficient responses.*

- 1.c.i. Resources Needed for Site Characterization (5 points)

	Does the section <u>either</u> state that no additional resources are <u>or</u> identify secured or potential sources for additional site characterization?
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Strong Applications will:

- *Clearly state that no additional resources are needed*
or
- *Identify specific resources, secured or planned, for site characterization, such as state assessment funds or other resources.*

Note: documentation for any secured commitments of leveraged funding should be attached to the proposal packet.

- 1.c.ii. Resources Needed for Site Remediation (5 points)

	Does the section <u>either</u> identify secured, requested, or planned resources to complete the remediation <u>or</u> clearly state that the requested EPA funding will be enough to complete remediation.
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Strong Applications will:

- *Clearly state that no additional resources are needed* **or**
- *Identify specific resources, secured or planned, for site remediation, such as state funds or other resources.*

Note: documentation for any secured commitments of leveraged funding should be attached to the proposal packet.

Note: a response may not earn full points if the applicant duplicates sources that are listed in 3.b. Additionally, a response may only earn full points when the applicant has resources that are secured, significant, relevant, and sufficient to complete the remediation.

- 1.c.iii. Resources Needed for Site Reuse (5 points)

	Does the section <u>either</u> identify secured, requested, or planned resources to complete the reuse of the site(s).
	Does the section include sources that are <u>not</u> discussed in section 3.b.?

Strong Applications will:

- *Clearly state that no additional resources are needed*
- *Not duplicate sources listed in section 3.b.*

Note: documentation for any secured commitments of leveraged funding should be attached to the proposal packet.

Note: a response may not earn full points if the applicant duplicates sources that are listed in 3.b. Additionally, a response may only earn full points when the applicant has resources that are secured, significant, relevant, and sufficient to complete the remediation.

- 1.c.iv. Use of Existing Infrastructure (5 points)

	Does the section adequately describe how the grant will facilitate use of existing infrastructure?
	If additional infrastructure or upgrades are needed, are those needs or upgrades adequately described?
	Are the funding resources needed for upgrades or additions adequately described?

Strong Applications will:

- *Clearly connect the proposed project with the use of existing infrastructure.*

2. Community Need and Community Engagement (40 points)

• 2. a. Community Need (25 points)

- 2.a.i. The Community’s Need for Funding (5 points)

	Does the section adequately describe how the grant will meet the needs of the community?
	Does the section adequately describe the community’s inability to draw on other sources of funding for remediation <u>and</u> subsequent reuse in the target area because of the small population and/or low-income of the community.
	Are the funding resources needed for upgrades or additions adequately described?

Strong responses will

- *Identify a small and/or low-income population in the same community(ies) discussed in 1.a.i.*
- *Specifically discuss why this funding is needed.*
- *Discuss projected outcomes that will benefit the same community(ies).*

Note: if the inability to draw on other sources of funding is not because the community has a small population or is low-income, then the response may only earn up to 2 points.

- 2.a.ii. Threats to Sensitive Populations (20 points)
 - (1) Health or Welfare of Sensitive Populations (5 points)

	Does the section identify sensitive populations ³ in the target area?
	Does the section describe health <u>or</u> welfare issues of these groups?
	Does the section discuss how this grant and the reuse strategy will address these issues and/or help identify and reduce threats to the health <u>or</u> welfare of such groups?

Strong responses will

- *Draw a clear line between how this grant will help address issues identified.*
- *Describe how any identified health issues can be correlated to health risks from known contaminants on target site(s).*
- *Use tools such as EJSCREEN, CEJST, and local health data to describe sensitive populations and health or welfare concerns.*

³ Sensitive populations include pregnant women, minority or low-income communities, and areas with greater-than-normal incidence of diseases or conditions (including cancer, asthma, or birth defects) that may be associated with exposure to hazardous substances, pollutants, or contaminants.

- (2) Greater than Normal Incidence of Disease and Adverse Health Conditions (5 points)

	Does the section describe how <u>this grant</u> will address or help identify and reduce threats to populations in the target area who suffer from a greater-than-normal incidence of diseases or conditions (including cancer, asthma, or birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum?
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Strong responses will

- Draw a clear line between how this grant will help address issues identified.
- Describe how any identified threats or greater incidences of diseases can be correlated to health risks from known contaminants on target site(s).
- Use tools such as EJSCREEN, CEJST, and local health data to describe incidences of disease and adverse health conditions.

Note: if populations in the target area(s) do not suffer from a greater-than-normal incidence of cancer, asthma, or birth defects, then the response may only earn up to 2 points.

- (3) Advancing Environmental Justice (10 points)

	Does this section clearly describe the extent to which environmental justice issues affecting the underserved community and/or disadvantaged community in the target area?
	Does the section clearly describe the severity of the environmental justice issues experienced by the undeserved community and/or disadvantaged community in the target area?
	Does the section describe how <u>this grant</u> will advance environmental justice?
	Does the section describe how <u>this grant</u> will minimize the unintended displacement of residents and/or businesses among the community?

Note for all applications except those from Tribes, eligible Tribal entities, and territories, if none of the proposed sites identified in 1.a.ii. are located within a disadvantaged community (as identified by CEJST), then the response may only earn up to 2 points.

2. b. Community Engagement (15 points)

	Does the section identify local organizations/entities/groups that will be involved and provide assistance to assist with the project?
	Does the section identify a broad and diverse group of entities, such as community-based organizations, community liaisons, property owners, lenders, developers, and the general public?

	Does the section describe the role of each identified group in how it will be meaningfully involved in making decisions regarding cleanup <u>and</u> future reuse of the site?
	Does the section discuss a plan to community project progress to the local community and groups directly affected or involved in the work?
	Does the section discuss how community input will be solicited, considered, and responded to?
	Does the section include methods that offer an alternative to in-person community engagement?

Strong applications will:

- *Identify partners that are relevant, diverse, and sufficient to achieve project goals.*
- *Focus on quality of partners rather than quantity.*
- *Have a clear diversity of voices engaged.*

3. Task Descriptions, Cost Estimates, and Measuring Progress (55 points)

3. a. Proposed Cleanup Plan (10 points)

	Does the section clearly describe the cleanup plan for the site?
	Does the section describe the contaminants to be addressed?
	Does the section describe the cleanup method to be used?
	Does the section describe disposal requirements?

Note: Reviewers do not review ABCA, so applicants must include a cleanup plan response in the narrative. Language from the ABCA can be used in this section but the same level of detail as the ABCA is not expected or recommended.

Strong responses will:

- *Highlight types of contaminants, where they are on site, and potential extent,*
- *Incorporate resiliency as part of ABCA, and*
- *Align with redevelopment and reuse plans.*

• 3. b. Description of Tasks/Activities and Outputs (25 points)

	Does the section clearly describe the tasks/activities that will take place to address the site?
	If subawards are included, does the section indicate what tasks/activities or services will be provided?

	If applicable, does the section identify tasks/activities that are needed to support or complement the grant that will be contributed by sources other than EPA (i.e., leveraged resources or funding from your organization)?
	Is the anticipated schedule and timeline outlined for the 4-year period of performance?
	Does each task have an identified lead entity for those activities?
	If any task leads are entity(s) other than the applicant, does the section explain why that is appropriate?
	Are outputs clearly identified and quantified for each task/activity?

Note: a response that includes ineligible tasks/activities will be evaluated less favorably.

Note: a response may not earn full points if the applicant duplicates sources that are listed in 1.c.

● **3. c. Cost Estimates (15 points)**

	Does the section clearly describe how cost estimates for each task were developed?
	Are unit costs included where applicable?
	Are cost estimates included by budget category?
	Do administrative costs fall at or below the 5% limit?
	Does the section only include costs to be covered by the EPA grant funds?
	If seeking funds for multiple sites, are costs clearly delineated, either in separate tables or separate line items?

Notes:

- *Administrative costs that exceed 5% of the total EPA-requested funds will be evaluated less favorably.*
- *A response that includes cost estimates that are not reasonable or realistic to implement the project/grant will be evaluated less favorably. For example, applicants that request more funding than is reasonably justified in the Narrative to complete the proposed project/grant.*

● **3. d. Measuring Environmental Results (5 points)**

	Does the section discuss a plan and system to track, measure, and evaluate progress in achieving project outputs, results, and outcomes?
	Does the section discuss how the applicant will adjust if tracked progress does not follow projections?

Strong responses will

- Discuss various elements being tracked (from big picture to budget)
- Provide a process for evaluating project status and needed corrective actions.

Note: Although the use of ACRES is common for tracking methods, applicants are not required to reference ACRES in their response to earn full points. Of utmost importance is that the applicant provides a robust response regarding the listed criteria.

4. Programmatic Capability (15 points)

• **4. a. Programmatic Capability (15 points)**

	Does the section describe the organizational structure that will be used to ensure timely and successful expenditure of funds?
	Does the section describe the organizational structure that will be used to ensure timely and successful completion of all technical, administrative, and financial requirements of the project and grant?
	Does the section include a discussion of key staff that will administer the grant, including roles, expertise, qualifications, and experience?
	Does the section describe a system in place to acquire additional expertise and resources, such as contractors or subrecipients?
	Does the section describe efforts to promote strong labor practices, local hiring/procurement, or linking members of the community to potential employment opportunities related to the project in a meaningful and equitable way?

Note, if an applicant has selected a contractor or subrecipient without complying with applicable requirements, the response will be evaluated less favorably.

• **4. b. Past Performance and Accomplishments (15 points)**

• **4.b.i. Currently Has or Previously Received an EPA Brownfields Grants (15 points)**

	Does the section describe the specific accomplishments achieved under the current/most recent grant(s), including at a minimum the number of sites assessed and/or cleaned up?
	Does this section discuss whether outputs and outcomes were accurately reflected in ACRES at the time of this application and, if not, explain why?
	Does this section discuss compliance with the workplan, schedule, and terms and conditions under the current/most recent grant(s)?
	Does this section discuss the applicant’s history of timely and acceptable quarterly performance and grant deliverables, as well as ongoing ACRES reporting?
	Does this section include information on whether the applicant has made and reported progress towards achieving expected results in a timely manner?

	If progress has not been achieved in a timely manner, does the section discuss corrective measures taken and whether they were effective, documented, and communicated?
	For any open EPA grants, does the section indicate the grant period, whether funds are remaining, and the plan to expend funds by the end of the period of performance?
	For any closed grants, does the section indicate if there were funds remaining when the grant closed, the amount remaining, and a brief explanation for why the funds were not expended? ⁴

- - OR - -

- 4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (15 points)

	Does the section describe non-EPA grants that are similar in scope and relevance to this project in terms of structure, community engagement, and/or deliverables?
	Does the section describe the awarding agency, amount of funding, and purpose of the current/most recent assistance agreement(s) received?
	Does the section discuss the project accomplishments, including specific outputs and outcomes and measures of success of identified grants?
	Does this section discuss compliance with the workplan, schedule, and terms and conditions under the current/most recent grant(s)?
	Does this section discuss the applicant's history of timely and acceptable quarterly performance and grant deliverables, as required by the awarding agency/organization?
	Does this section include information on whether the applicant has made and reported progress towards achieving expected results in a timely manner?
	If progress has not been achieved in a timely manner, does the section discuss corrective measures taken and whether they were effective, documented, and communicated?

- - OR - -

- 4.b.iii. Never Received Any Type of Federal or Non-Federal Assistance (8 points)

⁴ Note that if the applicant closed out a Revolving Loan Fund cooperative agreement in accordance with the FY23 RLF Policy Memo, EPA will not penalize the applicant for this action.

	Does the section affirm that the organization has never received any type of federal or non-federal assistance?
OR	
	Does the section discuss how the applicant has recently received an assistance agreement but has not had an opportunity to demonstrate compliance with the award requirements.

Note: if responding to 4.b.iii., the applicant can only receive 8 points in this section. In almost all cases, Mid-Atlantic TAB does not recommend applying for an EPA Brownfields grant if this section applies to the applicant organization.