



FY2022 Region 4 Brownfields Assessment Grant Application Tips for Non-profits

Region 4 Brownfields program is offering this guide for non-profit organizations that are preparing proposals for EPA Brownfields assessment grants. The guide includes suggestions to assist non-profits in successfully responding to assessment proposal criteria and highlights common weaknesses to be avoided.

A WORD ON NON-PROFITS' ELIGIBILITY:

The Brownfields Utilization, Investment, and Local Development Act (BUILD Act) of 2018 expanded eligibility for EPA Brownfields assessment grants to non-profit organizations. Applications can be "community-wide" (multiple sites) or "site-specific" (single property).

Note that ONLY 501(c)(3) non-profit organizations are eligible for Brownfields funding. Always include documentation of your non-profit status, such as an IRS letter.

Additionally, if your organization OWNS the Brownfield property in question (site-specific application), the property must be eligible ([eligibility checklist is available here](#)). Contact Brian Gross, gross.brian@epa.gov or (404) 562-8604, or Sara Janovitz, Janovitz.sara@epa.gov or (404) 562-9870, with questions about site-specific applications.

GENERAL:

- Have you written your responses to address the Evaluation Criteria (not the Ranking Criteria)? And, have you specifically addressed how this grant will facilitate the identification and reduction of threats as asked in several criteria, especially criteria 2?
- Have you fit your entire proposal within 10 pages and followed the application checklist?
- Does your story have continuity between sections?
- Did you label each section and subsection to help reviewers follow along with each criterion?

Non-Profit or, Non-Governmental Organizations (NGO) Characteristics & Challenges	
STRENGTHS:	CHALLENGES in Aligning with Criteria:
NGO's Organizations with clearly defined mission and focus; some are geographically based, others are function based	Function based NGO's need to explain more clearly their work within a specific for the community (see Section 1)
Extensive experience in fund raising	Reliance on federal grant funding (not secure); weak explanations about other partnerships contributing to reuse & redevelopment (Sections 1 & 2)
Organization creates clear and purposeful outcome & goals	Organization's mission presented as self-evident; proposals lack sufficient quantitative data to fully justify this need for the specific community (Section 2)
Strong connections with long-term partners	Building new relationships with residents, community leadership, stakeholders, and property owners (Sections 2 & 3)



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Section 1 - Project Area Description & Revitalization Plans (45 pts)

For 1.a.i.: Have you clearly defined the target area (cultural & industrial history) for your project and described the brownfields' challenges (residents living in underserved communities historically affected by economic disinvestment, health disparities and environmental contamination)? *Common weakness: Describing function/organization of Non-profit more than target community.*

For 1.a.ii.: Have you identified 2 to 5 priority brownfield sites within your target area? Have you discussed the environmental concerns and reasons for selecting these sites, including the significance to the community? Have you clearly explained the history, current conditions, and potential environmental issues for your priority sites? What are the exposure pathways? *Common weakness: sites are too few, or too widespread, and not focused within a clear geographic area (target areas). Consider matching number of sites with proposed budget.*

For 1.b.i.: Have you linked the sites' reuse plan/potential reuse to your community's larger revitalization goals (need for greenspace, affordable housing, etc.)? How will the sites' reuse help address your community's brownfields' challenges? *Common weakness: Surmising that the mission of the non-profit always fits within the local government's formal plans. Failing to work with the community to understand where (which locations) the non-profit mission fits best in the community's plans.*

For 1.b.ii.: What are your reuse plans based on (planning documents/processes, etc.)? Did you describe a realistic plan to bring about the planned reuse? How does the reuse specifically stimulate economic or non-economic benefits? *Common weakness: Assuming the non-profit's mission is self-fulfilling; therefore, specific economic or non-economic benefits are not well- described.*

For 1.c.i.: Have you discussed how your grant project will lead to additional firm (leveraged) funding for remediation AND redevelopment? *Common weakness: additional resources limited to more grants (viewed as not firm), and lack of description of longer-term partnerships to assist.*

For 1.c.ii.: Have you confirmed that your sites will be able to reuse existing infrastructure (streets, utilities, etc.)?

Challenge for Criteria 1: *Showing you know where you are going and how to get there. Balancing the need for funding (section 2.a.i) with the availability of leveraged resources (section 1.c.i). Focus on how grant will stimulate what you don't already have.*

Section 2 – Community Need & Community Engagement (35 pts)

For 2.a.i.: Have you clearly explained why you, the applicant, cannot carry out the assessment or other work? Have you quantitatively demonstrated real world budgetary issues/financial limitations that keep the local government from funding this assessment work. Have you shown how the target area is below poverty levels? *Common weakness: not articulating the non-profit's role in fulfilling a community need that is not/cannot be met by local government. Not demonstrating community poverty with appropriate benchmark or reference numbers.*

For 2.a.ii.1.: Did you establish that the target population has more severe health or welfare issues, especially within the sensitive populations (children, pregnant women, minority, or low income)? Use comparative data. This is the baseline for next sections. *Common weakness: poor or no use of government databases (Census.gov, EJ Screen,). Lack of benchmarks for data comparison.*



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TIP: Think about the need that your proposed site reuse is meeting and illustrate this need by using corresponding data in the community's health/welfare data.

For 2.a.ii.2.: Do your data demonstrate a greater than normal incidence of disease or conditions showing disproportionate need plausibly related to exposure to hazardous substances, pollutants, or contaminants, linked back to the brownfield sites? *Common weakness: using general discussion in lieu of specific data for either asthma, cancer, or birth defects (including low birth weight), for the target population using appropriate data comparisons.*

For 2.a.ii.3.: Did you clearly show that the target area suffers from broader environmental justice challenges or negative environmental consequences? If you are relying on social justice issues such as socioeconomic, and/or racial disparities in the target area to make your case, did you clearly show how they are derived from past environmental consequences from government or commercial practices/ policies? Consider using the EJ Screen. <https://www.epa.gov/ejscreen>. *Common weakness: lack of demonstration that target population is disproportionately impacted because of industrial, governmental, or commercial operations or policies.*

TIP: Expand beyond the demographic/economic challenges in previous criteria. EJScreen and other tools can help identify the environmental issues in your community.

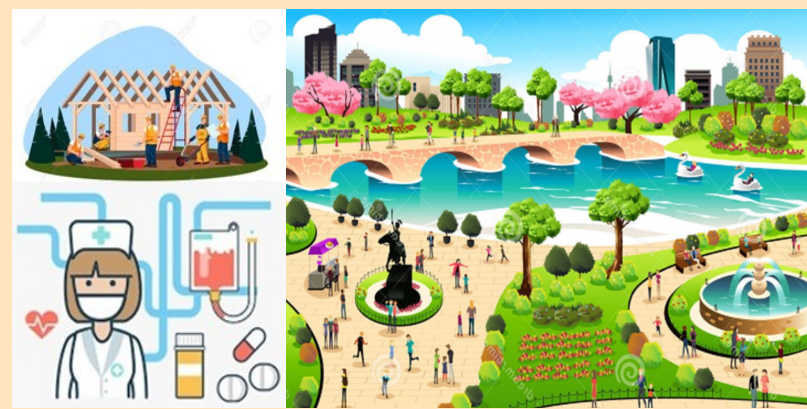
For 2.b.i.: Do you have 3 to 5 partners that either are clearly aligned with this grant's success? Do they represent different viewpoints? Is it clear that the local government is a partner for this grant? Is it clear that at least one group represents local people in the target area's interest? Do not list the EPA or the state as partners. *Common weakness: Local community government (mayor or city planner, etc.), are not partners. No representation by local residents. Listed partners are redundant and lack diversity. Over-reliance on existing partnerships rather than building partnerships and relationships with community stakeholders.*

TIP: for small communities that may not have grassroots community organizations (for example, homeowner's associations), state that these organizations do not exist and therefore partnerships are limited.

For 2.b.ii.: Have you stated a clear and unique role for each project partner that will involve them in site selection, cleanup, AND future reuse of the brownfield properties? Each one must be able to perform or have a voice in guiding one or more of these actions. Use a chart to clarify. *Common weakness: Lack of uniqueness in roles.*

For 2.b.iii.: Do you have a clear plan to evaluate and respond to community input in a transparent and meaningful way? Does your community input response clearly demonstrate that communication will go full circle from you to the community and back to how you incorporated community input? Are your methods of communication appropriate and tailored to your community, including virtual? *Common weakness: communication is one way.*

Challenge for Criteria 2: *Have you identified a target area that suffers disproportionate broad health and welfare impacts, and specific health conditions that can be tied to brownfield sites? Have you made a plausible case that environmental assessment and redevelopment will help address some of these issues? For non-profits, intended uses of properties are often already determined by the function of the non-profit; therefore, input to site selection needs to weigh more heavily for community engagement.*



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Section 3 – Task Descriptions, Cost Estimates & Measuring Progress (50 pts)

For 3.a.i.: Are all costs eligible? Check FAQ cost examples. Do the figures add up correctly? SEE FAQs: <https://www.epa.gov/brownfields/multipurpose-assessment-rlf-and-cleanup-marc-grant-application-resources>

Tip: *Non-profits may have different outreach needs than local governments because they typically don't represent a taxable authority. Different outreach needs (i.e. broader geographic areas), may require better descriptions of their approach to new locations and connecting to local governments & communities. This may result in a larger outreach budget.*

For 3.a.ii.: Have you shown that the project schedule and milestones demonstrate completion in 3 years? Have you shown that some tasks may be ongoing throughout the project? *Common weakness: the project schedule and milestones are too broad to demonstrate the completion in the 3-year performance period.*

For 3.a.iii.: In describing the lead for each task, ensure you (the applicant) have some role, even if it will be led by the contractor. Give titles. *Common weaknesses: the task lead is not clearly identified or consistent with the information presented in the rest of the application.*

For 3.b.: Are the costs listed in your Budget Table consistent with the costs throughout the Section, and do they add up correctly to the total amounts? If you included administrative costs, did you limit those to 5% of the total budget? Costs can be classified as direct or indirect and should not be confused with allowable programmatic costs. *Common weakness: cost estimates are not consistent between the task descriptions, cost calculations, and budget table.*

For 3.b.i: Have you shown unit costs for all budgeted items (hours required, number of Phase I and Phase II environmental site assessments, ABCAs, etc.)? For cleanups: cost per cubic foot/gallon/ton, etc.? *Common weaknesses: the costs were not shown as unit costs and/or the explanation of how the unit costs were developed was vague.*

For 3.b.ii.: Is most of your budget planned for direct environmental assessment work (Phase I and Phase II environmental site assessments)? *Common weakness: budget for Phase I and Phase II environmental site assessments is less than half of the total budget.*

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For 3.c.: Have you included EPA quarterly reporting requirements, ACRES and project closeout in your measures and evaluation discussions? Have you included a statement about who would implement corrective action(s) if the project falls behind? Have you included outputs and outcomes?



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Section 4 – Programmatic Capability & Past Performance (30 pts)

For 4.a.i-ii.: Have you demonstrated your organization's ability to manage this grant by naming specific personnel and their relevant experience? Did you describe their roles within your organizational structure? If you are a coalition, did you describe how each partner will be meaningfully involved in decision-making for your project? *Common weakness: missing or insufficient discussion of grant-management experience.*

For 4.a.iii.: Have you addressed how your organization will procure additional expertise (contractual support)? *Common weakness: overlooking this section or failing to mention that contractual support will be done through a competitive selection process.*

For 4.b.ii.: Have you listed recent grants of similar size, scope, or relevance that you received? Have you described the purpose of the grant(s), specified the outputs/outcomes or current progress, and how you met the goals of the grant program? *Common weakness: failing to include outputs/accomplishments, especially if discussing an active grant.*

Clearly state that you complied with your past grants' workplan schedules, terms & conditions, and reporting requirements.

TIP: Consider using a table that identifies the purpose, funding source, dollar amount, and accomplishments/outputs. List **ONLY** grants for which your organization was the recipient.

DISCLAIMERS:

- This checklist is not intended to be comprehensively responsive to the criteria; it is intended to address commonly noted weaknesses from past proposals in the FY 2021 competition.
- Please check [the website](#) in late summer for more information on the national Grant Guideline Outreach Webinar. This webinar will include more specific information for the FY 2022 competition, as well as highlight key changes between the FY 2021 and FY 2022 guidelines.
- This document should not be considered a substitute for EPA policy, regulations, and/or guidance.
- EPA Region 4 will host a virtual grant writing training session for non-profits on August 17, 2021 at 11:00AM. A recording of the training will be available at our website: epa.gov/brownfields/Region4.