

**AGENCY:** ENVIRONMENTAL PROTECTION AGENCY (EPA)

**TITLE:** BROWNFIELDS TRAINING, RESEARCH, AND TECHNICAL ASSISTANCE GRANTS

**ACTION:** Request for Applications (RFA) - Questions and Answers

**RFA NO:** EPA-OSWER-OBCR-08-02

**CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA) NOS.:** 66.814

**SUMMARY:** The following are formal Agency responses to questions/comments regarding the subject solicitation.

**1. What is the closing date of the Technical Assistance to Brownfields Communities solicitation?**

The closing date and time for receipt of proposals is May 1, 2008 5:00 pm EDT.

**2. What is the total maximum award amount?**

The maximum annual funding is \$300,000 for up to 5 years. The maximum award for the 5 year period would be \$1,500,000.

**3. The RFA does not specifically address multiple proposal submissions to this RFA, but neither does it appear to restrict being a lead in one project and a sub in another project.**

Nothing prohibits an entity from submitting a proposal as the lead organization for one project and then serving as a partner organization on another proposal. Each proposal would need to be submitted separately and would be evaluated on its own individual merits.

**4. Would an entity who currently has a brownfields cooperative agreement authorized under CERCLA Section 104(k)(6) be ineligible to apply for the Brownfields Training, Research, and Technical Assistance grants because it would be viewed as a duplicative grant?**

Entities who currently have a cooperative agreement authorized under CERCLA Section 104(k)(6) do not become ineligible by virtue of already having a Section 104(k)(6) agreement. As long as the entity meets the eligibility requirements of the solicitation, they are eligible to apply for this grant opportunity. However, proposals must not duplicate grants awarded under other EPA Brownfields grant programs described in CFDA Nos. 66.818, "Brownfields Assessment, Revolving Loan Funds, and Cleanup Grants" and 66.815, "Brownfields Job Training Grant" or other federally funded environmental training, research, or technical assistance programs in their target

community(ies). Please see the EPA's Brownfields website for more details at <http://www.epa.gov/brownfields>.

**5. Would an entity that is currently performing brownfields assessments for a community be eligible to apply for a Brownfields Training, Research, and Technical Assistance grant?**

Entities that meet the eligibility requirements of the solicitation are eligible to apply for this grant opportunity. The fact that an entity is currently performing or assisting others in performing an assessment does not make them ineligible to apply for this grant.

**6. Is a registered 501(c)(6) organization eligible to apply for a Brownfields Training, Research, and Technical Assistance grant?**

Yes, non profit trade associations exempt from taxation under Section 501(c)(6) of the internal revenue code are eligible to apply for funding under CERCLA 104(k)(6), therefore, they would be eligible to apply for a Brownfields Training, Research, and Technical Assistance grant.

**7. Would it be acceptable to EPA for an applicant to work with another agency or organization as partners?**

It is acceptable for the applicant to partner with other entities as long as the entity who is the Cooperative Agreement recipient meets the eligibility requirements. Whether or not a partnership agreement needs to be completed depends on the nature of the transaction between the partners.

**8. Can the Brownfields Training, Research, and Technical Assistance grant reimburse the indirect costs of a contractor?**

Yes. The administrative cost prohibition applies only to the grant recipient's indirect costs and not to the costs the grantee incurs under a contract for eligible programmatic costs. A grantee would be able to use grant funds to reimburse a contractor for his indirect costs if the contractor is performing programmatic activities, and the costs were reasonable and allocable to the task being performed. The EPA guidelines provide that eligible programmatic costs are expenditures for activities that are integral to achieving the purpose of the grant. A contractor's indirect costs that are otherwise reasonable (e.g. are covered by an indirect cost rate agreement with its cognizant federal audit agency) and normally charged to cost reimbursement contracts are programmatic rather than administrative.

**9. Can a grantee or subgrantee who directly charges the amount of their building lease be reimbursed for those costs under the Brownfields Training, Research, and Technical Assistance grant or would the lease costs be considered an ineligible administrative cost? The building lease costs are not part of the negotiated overhead rate. They are charged as direct costs with no overhead costs applied.**

If a grantee or subgrantee normally treats lease costs for space needed for specific grants as a direct cost of carrying out the grant, these costs are considered programmatic rather than administrative. However, the grantee or subgrantee must treat lease costs for non-university space consistently as direct costs rather than as part of its General and Administrative overhead.

**10. Is the Brownfields Training, Research, and Technical Assistance grant program offered each year, and if so, do the funding amount and application requirements generally stay the same?**

These grants have been offered periodically depending on stakeholder need and funding availability. Information on past grants is available at <http://www.epa.gov/brownfields/trta.htm>.

**11. What types of entities usually receive the majority of funding?**

Previous grant awards have gone to a variety of eligible entities including nonprofit organizations, colleges and universities, and regional, state and local government agencies. EPA does not know what types of entities will receive the majority of the funding.

**12. Please explain what smart growth policies and applications would not be eligible for funding under the brownfields training, research, and technical assistance projects.**

Funding under this announcement is not available for projects related to exploring, testing and implementing smart growth policies and applications that EPA funds under CFDA No. 66.611, "Environmental Policy and Innovation Grants." An example of such projects is the RFP for EPA-OPEI-07-03, "Educational Campaign on Policy Barriers to Redevelopment of Vacant Properties", available at <http://www.epa.gov/dced/grants/opei0703.htm>.

Further examples of smart growth policies and applications that are not eligible under this announcement include: piloting of innovative infill development demonstration programs, policies, tools, or techniques to determine transferability to multiple sites in the neighborhood, community, municipality, county, region, or state; site design, community involvement and redevelopment planning activities associated with post cleanup activities on single or multiple infill parcels; studies of the regulatory and market barriers to infill redevelopment; training and technical assistance to communities to evaluate and revise local and state development regulations, e.g., zoning and building codes; development of screening or evaluation tools or programs that assess post cleanup redevelopment designs for consistency with smart growth principles; development of screening or evaluation tools or programs that assess opportunities for infill development within one or multiple neighborhood(s); and community involvement and visioning efforts associated with neighborhood or community planning efforts associated with

general redevelopment of an area (as distinguished from community involvement and community planning for inventories, assessments, remediation or site preparation limited to brownfields properties).