

FY25 Summary of the Assessment, Revolving Loan Fund and Cleanup (ARC) Grant Guidelines Changes
(as of 9/3/24)

EPA prepared this Summary of Changes document to assist prospective applicants with preparing Brownfields Assessment, Revolving Loan Fund (RLF), and Cleanup Grant applications. **Please review the FY25 Application Guidelines** (also referred to as Request for Application (RFA), Notice of Funding Opportunity (NOFO), or the solicitation) **when preparing your application**. If the information in the Summary of Changes differs from information in the statute, regulation, or the Guidelines, then the statute, regulation, or the Guidelines will take precedence.

If you are interested in **applying for more than one grant type in FY25**, review the [FY25 Eligibility Chart for Multiple Applications](#) to determine which other grants are available to you.

If you currently have an EPA Brownfields Grant and are interested in applying for an FY25 grant, review the [FY25 Eligibility Chart for Existing Grant Recipients](#) to determine which other grants are available to you.

A solicitation for new Multipurpose Grants will not be issued in FY25.

- [Changes to All Grant Types](#)
- [Changes to the Community-wide Assessment Grant Guidelines](#)
- [Changes to the Assessment Coalition Grant Guidelines](#)
- [Changes to the Community-wide Assessment Grants for States and Tribes Guidelines](#)
- [Changes to the Revolving Loan Fund Grant Guidelines](#)
- [Changes to the Cleanup Grant Guidelines](#)

CHANGES TO THE ASSESSMENT, REVOLVING LOAN FUND, AND CLEANUP GRANT GUIDELINES		
Topic	FY24 Multipurpose, Assessment, and Cleanup Grant Guidelines	FY25 Assessment, RLF, and Cleanup Grant Guidelines
General Information		
Justice40	Previously used the term “disadvantaged census tracts”	EPA updated its language and terminology related to Justice40: “disadvantaged community (as identified by CEJST)”
Inclusion of Territories under Disadvantaged Communities		EPA added language to clarify that under these guidelines, disadvantaged communities also include communities located in a U.S. Territory (Puerto Rico, Virgin Islands, Guam, American Samoa, and Commonwealth of Northern Mariana Islands). Associated requirements that do not apply to territories under the Narrative Information Sheet and the Narrative are clearly identified.

I.E. Supporting Environmental Justice		EPA updated its definition of environmental justice and clarified that the use of geographic preference to evaluate bids or proposals will no longer be prohibited effective for EPA funding awarded on or after October 1, 2024. If a successful applicant procures goods or services (including consulting services) after October 1, 2024, they may include geographic preference as an evaluation factor.
I.F. Supporting Climate Adaptation and Resilience		EPA added definitions for climate adaptation and climate change mitigation.
Narrative Information Sheet – Website URL		Applicants are requested to provide the URL of their organization: “Provide the website URL of your organization. If selected for funding, EPA will include the link to your website on the Brownfields Grant Factsheet Tool .”
Narrative Information Sheet - Target Area and Priority Site Information		Applicants may include a map of their target area(s) and/or priority site(s): “(Optional) As a separate one-page attachment, you may include a map to visually depict the target area(s) and/or priority site(s). Do not include any additional information or data on the map. Maps will not be evaluated and will not count against the 3-page limit. Applicants that do not include a map will not be penalized.”
III. Eligibility Information and Threshold Criteria		
III.A. Who Can Apply?	Previously stated: “Note, individual entities, for-profit organizations, and nonprofit organizations exempt from taxation under section 501(c)(4) of the Internal Revenue Code that lobby are not eligible to receive Brownfields Grants.”	EPA clarified (for all grant types but cleanup) that only nonprofit organizations that are exempt from taxation under section 501(c)(3) are eligible to apply: “Note, individuals, for-profit organizations, organizations exempt from taxation under section 501(c)(4) of the Internal Revenue Code that lobby the Federal government, and nonprofit organizations that are not tax exempt under section 501(c)(3) are ineligible to receive Brownfields Assessment/RLF Grants.”

III.B. Threshold Criteria Formatting		Action items are bolded and underlined to flag requirements for applicants and avoid missed responses. Other minor changes are made to the order in which information is requested to clarify the requirement.
III.B. Contractors (change applicable to Tribal applicants only)		If a Tribe procures goods or services that will be paid for with EPA funding awarded on or after October 1, 2024, they will no longer be required to follow the competition requirements in 2 CFR Part 200 and instead may follow the same competitive policies and procedures they use for procurements from non-Federal funds. Note, however, that are still subject to EPA’s Disadvantaged Business Rule at 40 CFR § 33.304 when conducting procurements.
III.C. Cost Sharing and Matching Requirements		Added the following section on cost sharing: As provided in 2 CFR § 200.1 , cost sharing or matching means the portion of project costs not paid by Federal funds or contributions. Consistent with the authorizing statute in CERCLA § 104(k)(7) (for Assessment and Multipurpose)/the Bipartisan Infrastructure Law (for Cleanup and RLF), cost sharing and matching funds are <u>not required under this competition</u>. As provided in 2 CFR § 200.1 , <i>Voluntary committed cost sharing</i> is when an applicant voluntarily proposes to legally commit to provide costs or contributions to support the project when a cost share is not required. <u>Voluntary cost share will not be accepted under this competition.</u>
IV.E. Ranking Criteria & V.A. Evaluation Criteria		
General Criteria Language Simplification		Minor changes are made to simplify some of the narrative/ranking criteria language in Section IV and the corresponding evaluation criteria in Section V.
2.a.ii(3)(b) Advancing Environmental Justice	The previous criterion stated: “Discuss how this grant and reuse strategy/projected site reuse(s) will advance environmental justice and minimize the displacement of residents and/or businesses among the underserved community(ies) in the target area(s).”	Added to the criterion to clarify the requirement: “Discuss how this grant and reuse strategy/projected site reuse(s) will advance environmental justice and minimize the unintended displacement of residents and/or businesses among the underserved community(ies) in the target area(s).”

2.b.ii. Project Roles		Added a column to the sample format for list of organizations/entities/groups & roles for applicants to provide the entity's mission.
3.a.ii. Anticipated Project Schedule		<p>Added note to the criterion on pre-award costs:</p> <p>“Discuss the anticipated schedule and timeline for the EPA-funded activities outlined above in <i>3.a.i. Project Implementation</i> during the period of performance.</p> <p>EPA may reimburse successful applicants for eligible programmatic pre-award costs incurred up to 90 days prior to award. Applicants may include pre-award costs for eligible activities in their proposed project. Travel expenses associated with brownfields-related training, such as the National Brownfields Training Conference is an eligible expense. The budget/project period start date must be before the date that any proposed pre-award costs are incurred. For more information on pre-award costs, please see the FY25 FAQs.”</p>
4.a.i. Organizational Capacity (all grant types except cleanup)		<p>Added to the criterion:</p> <p>“Discuss the applicant’s organizational capacity to oversee grant tasks/activities and carry out and manage the programmatic, administrative, and financial requirements of the project and grant.”</p>
V.B. Other Factors and Considerations	The previous other factor stated: “Whether the community population is 10,000 or less.””	<p>EPA revised the other factor to align with the 128(a) definition of a small community: “Whether the community population is 15,000 or less.”</p>
IV.F. Leveraging		EPA clarified the language to differentiate between leveraging and legally binding voluntary committed cost sharing. See Section IV.F. for details.
V.I.F. Build America, Buy America		EPA streamlined this section.

COMMUNITY-WIDE ASSESSMENT GRANT GUIDELINE CHANGES

A Community-wide Assessment Grant is appropriate for communities that are beginning to address their brownfield challenges, as well as for communities that have ongoing efforts to bring sites into productive reuse.

Topic	FY24 Assessment Grant Guidelines	FY25 Assessment Grant Guidelines
General Information		
N/A		No significant changes to highlight.
III. Eligibility Information and Threshold Criteria		
Ineligible Applicants	Entities that were awarded (or pending an award for) an FY22 or FY23 Community-wide Assessment Grant for States and Tribes are not eligible to apply for additional Assessment Grant funding.	Entities that were awarded (or pending an award for) an FY22, FY23, or FY24 Community-wide Assessment Grant for States and Tribes are not eligible to apply for additional Assessment Grant funding.
III.B.3. Expenditure of Existing Grant Funds	Current Assessment Grant recipients and Multipurpose Grant recipients that want to apply for funding must meet the 70.00% drawdown requirement by October 1, 2023, to apply for an FY24 Community-wide Assessment Grant.	Current Assessment Grant recipients and Multipurpose Grant recipients that want to apply for funding must meet the 70.00% drawdown requirement by October 1, 2024 , to apply for an FY24 Community-wide Assessment Grant. Review the eligibility criteria in Section III. of the Guidelines for details.
IV.E. Ranking Criteria & V.A. Evaluation Criteria		
V.B. Other Factors and Considerations		In making the final selections, EPA's Headquarters Selection Official intends to select a minimum of 3 quality applications per region.
Point/Percentage Distribution		
Listed in Section V. within the Evaluation Criteria	Project Area Description and Plan for Revitalization – 25% Community Need and Community Engagement – 25% Task Description, Cost Estimates, and Measuring Success – 28% Programmatic Capability – 22% Maximum number of points: 160	No changes.

ASSESSMENT COALITION GRANT GUIDELINE CHANGES

Assessment Coalitions are designed for one “lead” eligible entity to partner with two to four eligible entities that do not have the capacity to apply for and manage their own EPA cooperative agreement and otherwise would not have access to Brownfields Grant resources.

Topic	FY24 Assessment Grant Guidelines	FY25 Assessment Grant Guidelines
General Information		
Award Information	<ul style="list-style-type: none"> Awards are available for up to \$1,500,000. 	<ul style="list-style-type: none"> Awards are available for up to \$1,200,000.
Use of Funds	At least 80% of the funding for site-specific activities must be for sites located in underserved communities.	This requirement was removed.
III. Eligibility Information and Threshold Criteria		
Ineligible Applicants	Entities that were awarded (or pending an award for) an FY22 or FY23 Community-wide Assessment Grant for States and Tribes are not eligible to apply for additional Assessment Grant funding.	Entities that were awarded (or pending an award for) an FY22, FY23, or FY24 Community-wide Assessment Grant for States and Tribes are not eligible to apply for additional Assessment Grant funding.
III.B.4. Existing Brownfields Grants to Non-lead Members	“Entities that have an open Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup (MARC) Grant and entities that were awarded a MARC Grant that closed in 2016 or later, are not eligible to be a non-lead coalition member.”	<p>EPA replaced this requirement with the following:</p> <p>“The coalition must have at least one non-lead member that has never been awarded a Brownfields Multipurpose, Assessment, Revolving Loan Fund, or Cleanup (MARC) Grant.</p> <p>Indicate which non-lead coalition member(s) has never been awarded a Brownfields MARC Grant.</p> <p>Indicate which, if any, of the non-lead coalition members have an open EPA Brownfields MARC Grant.</p> <p>Current EPA Brownfields MARC Grant recipients must demonstrate that payment has been received from EPA (also known as ‘drawn down’), and drawn down funds have been disbursed, for at least 70.00% of the funding for each MARC cooperative agreement they have with EPA by October 1, 2024, in order to be a non-lead coalition member under this solicitation.</p> <p>To demonstrate this, applicants must attach a copy of a financial record for each member of the coalition with an open grant that</p>

		displays the amount of cooperative agreement funds drawn down (e.g., a report from the Automated Standard Application for Payments (ASAP) or general ledger entries). If necessary, applicants may contact the assigned EPA Project Officer for the cooperative agreement(s) or Elyse Salinas (brownfields@epa.gov) to obtain draw down information from EPA's grant financial database (Compass Data Warehouse). Disbursements of drawn down funds must comply with requirements in EPA's General Terms and Conditions for timely disbursement of EPA funds (i.e., recipients other than states must substantially disburse all of the funds within 5 business days of draw down)."
III.B.7. Expenditure of Existing Grant Funds	Current Assessment Grant recipients and Multipurpose Grant recipients that want to apply for funding must meet the 70.00% drawdown requirement by October 1, 2023, to apply for an FY24 Assessment Coalition Grant. Review the eligibility criteria in Section III. of the Guidelines for details.	Current Assessment Grant recipients and Multipurpose Grant recipients that want to apply for funding must meet the 70.00% drawdown requirement by October 1, 2024, to apply for an FY25 Assessment Coalition Grant. Review the eligibility criteria in Section III. of the Guidelines for details.
IV.E. Ranking Criteria & V.A. Evaluation Criteria		
1.a.i. Coalition Members	The previous evaluation criterion included a note that if the coalition did not include at least one non-lead member that is a community-based organization, then the response would be evaluated less favorably.	EPA removed the requirement from the evaluation criterion for at least one non-lead coalition member to be a community-based organization.
Point/Percentage Distribution		
Listed in Section V. within the Evaluation Criterion	Project Area Description and Plan for Revitalization – 27% Community Need and Community Engagement – 24% Task Description, Cost Estimates, and Measuring Success – 27% Programmatic Capability – 21% Maximum number of points: 165	No changes.
COMMUNITY-WIDE ASSESSMENT GRANTS FOR STATES AND TRIBES (CWAGST)		
This funding is only available to states, Tribes, and eligible native corporations in Alaska to address brownfield sites throughout their entire jurisdiction.		

Topic	FY24 Assessment Grant Guidelines	FY25 Assessment Grant Guidelines
General Information		
N/A		No significant changes to highlight.
III. Eligibility Information and Threshold Criteria		
Ineligible Applicants	Entities applying for an FY24 Community-wide Assessment Grant for States and Tribes may not apply for an FY24 Community-wide Assessment Grant, an FY24 Assessment Coalition Grant (or be a non-lead coalition member), or an FY24 Multipurpose Grant.	Entities applying for an FY25 Community-wide Assessment Grant for States and Tribes may not apply for an FY25 Community-wide Assessment Grant, or an FY25 Assessment Coalition Grant (or be a non-lead coalition member).
III.B.3. Expenditure of Existing Grant Funds	Current Community-wide Assessment Grant for States and Tribes recipients that want to apply for funding must meet the 70.00% drawdown requirement by October 1, 2023, to apply for an FY24 Community-wide Assessment Grant for States and Tribes. Review the eligibility criteria in Section III. of the Guidelines for details.	The draw down percentage required is reduced: Current EPA Brownfields Community-wide Assessment Grant for States and Tribes recipients must demonstrate that payment has been received from EPA (also known as ‘drawn down’), and drawn down funds have been disbursed, for at least 60.00% of the funding for the Community-wide Assessment Grant for States and Tribes cooperative agreement they have with EPA by October 1, 2024, in order to apply for Assessment Grant funding under this solicitation.
IV.E. Ranking Criteria & V.A. Evaluation Criteria		
2.a.i. The Community’s Need for Funding	The previous criterion stated: “Describe how this grant will meet the needs of the community(ies) (i.e., the communities located within the geographic boundary(ies)) that has an inability to draw on other initial sources of funding to carry out environmental assessment or remediation, and subsequent reuse in the target areas because of the small population and/or low-income of the community. Additionally, describe how this funding will serve communities that do not have the capacity to apply for and manage their own Brownfields Grant and would otherwise not have access to Brownfield Grant resources to address brownfield sites.”	EPA removed the second part of the criterion to avoid redundancy. The criterion now states: “Describe how this grant will meet the needs of the community(ies) (i.e., the communities located within the geographic boundary(ies)) that has an inability to draw on other initial sources of funding to carry out environmental assessment or remediation, and subsequent reuse in the target areas because of the small population and/or low-income of the community. ”

Point/Percentage Distribution		
Listed in Section V. within the Evaluation Criterion	Project Area Description and Plan for Revitalization – 24% Community Need and Community Engagement – 27% Task Description, Cost Estimates, and Measuring Success – 27% Programmatic Capability – 21% Maximum number of points: 165	Project Area Description and Plan for Revitalization – 25% Community Need and Community Engagement – 25% Task Description, Cost Estimates, and Measuring Success – 28% Programmatic Capability – 22% Maximum number of points: 160
REVOLVING LOAN FUND (RLF) GRANT GUIDELINE CHANGES		
Revolving Loan Fund Grants provide funding for a grant recipient to capitalize a revolving loan fund and to provide loans and subgrants to carry out cleanup activities at brownfields sites.		
Topic	FY23 RLF Grant Guidelines	FY25 RLF Grant Guidelines
General Information		
Section I & II Alignment		Sections on Climate and Labor Practices are added and Substantial Involvement are updated to align with the FY25 Assessment and Cleanup Grant Guidelines. Note, EPA did not issue a request for RLF Grants in FY24.
III. Eligibility Information and Threshold Criteria		
Eligible Applicants	Only eligible entities who do not have or are not part of (i.e., a coalition member) an open cooperative agreement for a Brownfields RLF at the time of application may apply for funding in the FY23 competition.	Only eligible entities who do not have or are not part of (i.e., a coalition member) an open cooperative agreement for a Brownfields RLF at the time of application may apply for funding in the FY25 competition.
Threshold Criteria Alignment		Threshold criteria on Intertribal consortia documentation, nonprofit 501(c)(4) eligibility, and required information for applicants to demonstrate that the procurement of contractor(s) was conducted in compliance with applicable requirements are incorporated to align with the FY25 Assessment and Cleanup Grant Guidelines.
IV.E. Ranking Criteria & V.A. Evaluation Criteria		
Ranking and Evaluation Criteria Alignment		Ranking and evaluation criteria are updated to align with the FY25 Assessment and Cleanup Grant Guidelines. Please review the FY25 RLF Grant Guidelines for details.

Point/Percentage Distribution		
Listed in Section V. within the Evaluation Criterion	Project Area Description and Plan for Revitalization – 23% Community Need and Community Engagement – 21% Task Description, Cost Estimates, and Measuring Success – 36% Programmatic Capability – 21% Maximum number of points: 195	Project Area Description and Plan for Revitalization – 24% Community Need and Community Engagement – 21% Task Description, Cost Estimates, and Measuring Success – 34% Programmatic Capability – 21% Maximum number of points: 190
CLEANUP GRANT GUIDELINE CHANGES		
<p>Cleanup Grants provide funding for eligible entities to carry out cleanup activities at brownfield sites.</p> <p>The applicant must own the site for which it is requesting funding.</p>		
Topic	FY24 Cleanup Grant Guidelines	FY25 Cleanup Grant Guidelines
General Information		
Award Information	<ul style="list-style-type: none"> Awards are available in three categories: up to \$500,000, up to \$2,000,000, or up to \$5,000,000. Applications in each category will be placed on separate selection lists. 	<ul style="list-style-type: none"> Awards are available in three categories: up to \$500,000, up to \$2,000,000, or up to \$4,000,000. Applications in each category will be placed on separate selection lists.
III. Eligibility Information and Threshold Criteria		
III.B.3. Expenditure of Existing Multipurpose Grant Funds	Current Multipurpose Grant recipients that wanted to apply for funding had to meet the 70.00% drawdown requirement by October 1, 2023.	Current Multipurpose Grant recipients that want to apply for funding must meet the 70.00% drawdown requirement by October 1, 2024, to apply for an FY25 Cleanup Grant.
III.B.9. Site Characterization	The letter from the State or Tribal Environmental Authority must clearly indicate that the information is for the FY24 Cleanup Grant application and not a previously submitted application. EPA is providing an optional letter template for the State or Tribal Environmental Authority to use.	The letter from the State or Tribal Environmental Authority must clearly indicate that the information is for the FY25 Cleanup Grant application and not a previously submitted application. EPA is providing an optional letter template for the State or Tribal Environmental Authority to use. See the MARC Grant Application Resources Page for a copy of the template. Additionally, under option c.i., the letter from the State or Tribal Environmental Authority (or equivalent state or Tribal regulatory

		oversight authority) may state that no voluntary response program or equivalent oversight program exists, if applicable.
III.B.12. Threshold Criteria Related to Hazardous Substance Sites		<p>EPA is adding an option for applicants to demonstrate eligibility for a site with hazardous building material (e.g., asbestos, lead-based paint) that has not been released into the outdoor environment: “To be eligible for a Brownfields Grant to address hazardous substances at a brownfield property, eligible entities must demonstrate that:</p> <ul style="list-style-type: none"> • They are exempt from CERCLA liability; or • They qualify for funding because the property is publicly owned, was acquired prior to January 11, 2002, and the applicant has not caused or contributed to a release or threatened release of hazardous substances at the property; or • They meet the requirements for asserting an affirmative defense to CERCLA liability through one of the landowner liability protections (e.g., the bona fide prospective purchaser liability protection per CERCLA § 101(40)); or • The site has hazardous building material(s) that is not released into the environment per CERCLA §§ 101(22) and 107(a). <p>Please review sections i., ii., iii., and iv. below and only provide responses to the section that pertains to your circumstance.”</p> <p><u>iv. SITES WITH HAZARDOUS BUILDING MATERIAL THAT IS NOT RELEASED INTO THE ENVIRONMENT</u></p> <p>If the brownfield site has a hazardous substance contained in the building materials (e.g., insulation, flooring, caulk, etc.) and the hazardous substance has not been released (and there is no threat of release) into the outdoor environment (i.e., air, groundwater, land surface, etc.), then CERCLA § 107 liability may not apply. The site is eligible for funding, provided all other site eligibility requirements are met.</p>

		<p>If there has been a release or there is a threatened release of the hazardous substance(s) into the outdoor environment, review threshold criteria 12.a.i., 12.a.ii., and 12.a.iii. and only provide responses to the section that pertains to your circumstance.</p> <p>Affirm that there has been no release and that there is no threat of release of the hazardous substance(s) from building materials into the outdoor environment based on the site conditions.</p> <p>For more information on the threshold eligibility analysis for sites with hazardous building materials (e.g., asbestos, lead-based paint) that are not released into the outdoor environment, please refer to FAQ L.18.”</p>
IV.E. Ranking Criteria & V.A. Evaluation Criteria		
N/A		No changes to highlight.
Point/Percentage Distribution		
Listed in Section V. within the Evaluation Criterion	Project Area Description and Plan for Revitalization – 31% Community Need and Community Engagement – 21% Task Description, Cost Estimates, and Measuring Success – 31% Programmatic Capability – 17% Maximum number of points: 180	No changes.