

# Planning & Development Services

PLANNING SERVICES      NEIGHBORHOOD & COMMUNITY SERVICES  
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AGENDA ITEM NO. 7

TO: Mayor Blad  
City Council

FROM: Christine Howe, Planning & Development Services Department  
Rebecca Robison, Public Works Department  
Hannah Sanger, Science and Environment

DATE: Meeting of April 18, 2024

RE: US EPA Community Change Grant – S. 5<sup>th</sup> Ave. Complete Street and Sewer

The Public Works Department, through the Engineering and Science & Environment Divisions, in conjunction with the Planning and Development Services Department is requesting approval of a grant application for the US Environmental Protection Agency's Environmental and Climate Justice Community Change grant for the S. 5<sup>th</sup> Ave. Complete Street and Sewer project. The grant application would provide necessary funding to create bicycle and pedestrian infrastructure along S. 5<sup>th</sup> Ave., install sewer to address the nitrate contamination in the area, install water and sewer carrier lines under the S. Valley Connector for future lift station projects, install Greenway trail connections from S. 5<sup>th</sup> Ave. through to the South Valley Connector, add potable water at parks in the project area, and improve stormwater and park amenities at Constitution and Centennial Park.

The proposed project addresses several of the EPA's climate and pollution reduction strategies. In addition to the noted infrastructure improvements, the project will utilize a robust public engagement process to ensure design and other project elements meet the needs of the community. As part of this process and per the grant application, the City will serve as the Lead Applicant and the Portneuf Greenway Foundation would be a Statutory Partner fulfilling the role requirement as a community-based organization. The total project costs are \$16,465,618.27 and there is no match. The project period of performance is three years.

City Council may wish to approve submission of the grant and, if awarded, authorize the mayor's signature on any and all pertinent documents subject to legal department review.

If you have questions or would like more information about the Community Change Grant application, please do not hesitate to contact me at [chowe@pocatello.gov](mailto:chowe@pocatello.gov) or 208-234-6186.

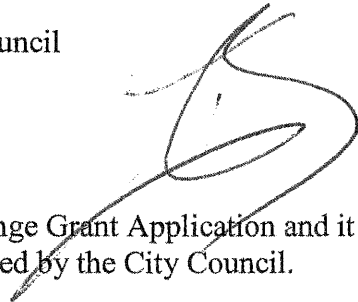


## MEMORANDUM

TO: Brian C. Blad, Mayor; Members of the City Council  
FROM: Ian Johnson, Deputy City Attorney  
RE: EPA Community Change Grant Application  
DATE: March 14, 2024

I have reviewed the above-referenced EPA Community Change Grant Application and it meets with my approval for the Mayor's signature once so authorized by the City Council.

If you have any questions, please feel free to contact me.

A handwritten signature in black ink, appearing to be 'I. Johnson', is written over the signature line of the memorandum. The signature is stylized and cursive.

## **Narrative**

### **Section A. Executive Summary**

**Application Title:** S. 5<sup>th</sup> Avenue Complete Streets

**Lead Applicant:** City of Pocatello, Idaho

**Statutory Partner to the Lead Applicant:** Portneuf Greenway Foundation

**Contact Information:** Christine Howe, Grants Manager, City of Pocatello,  
[chowe@pocatello.gov](mailto:chowe@pocatello.gov), 208-234-6186

**Eligibility:** The City of Pocatello, as the Lead Applicant, is a local government and is eligible to apply in conjunction with a Community Based Organization Statutory Partner. The City's CBO Statutory partner is the Portneuf Greenway Foundation which is a 501(c)3 non-profit organization that meets the definition per 2 CFR 200.1.

**Climate Action Strategies:** Strategy 1: Green Infrastructure and Nature-Based Solutions; Strategy 2: Mobility and Transportation Options for Preventing Air Pollution and Improving Public Health and Climate Resilience; Strategy 3: Energy-Efficient, Healthy, and Resilient Housing and Buildings

**Pollution Reduction Strategy:** Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience

**Grant Period and Completion:** 6/1/2024 – 6/1/2027

**Amount of Funding Requested:** \$16,465,618.27

**Target Investment Area:** N/A

**Disadvantaged Community to Benefit from the Projects:** The project area focuses on the City's S. 5<sup>th</sup> Avenue corridor which includes historically disadvantaged communities. Primarily, the project will immediately impact those residents living in census tracts 160050006001, 160050008002, 160050007001, 160050016032, and 160050017001, who are low and moderate-income.

**Other Sources of Funding:** N/A

**Resubmission Status:** N/A

### **Executive Summary:**

The proposed project seeks to improve local groundwater and air quality, while also improving community health and well-being in the City of Pocatello, Idaho. The project will be implemented by the City of Pocatello in partnership with the Portneuf Greenway Foundation, which has a broad base of membership and stakeholders focused on expansion of the alternative transportation trail along the Portneuf River, known as the Greenway Trail or Greenway,

throughout the City and metropolitan region. Most of the City of Pocatello, a small city of 58,000 located in the high desert of southeast Idaho, is classified as disadvantaged. The entire proposed project area is within disadvantaged census blocks. These areas are characterized by limited income and economic opportunity with a variety of health, social, and educational challenges.

The proposed project will transform this area into a thriving community by creating a safe non-motorized transportation corridor through this heavily travelled area, connecting homes to sewer lines to decrease nitrate contamination of the aquifer, enlarging the size of select sewer lines to improve capacity, expanding park access by installing working drinking fountains at project area parks, and restoring parks with new infrastructure, stormwater improvements, and interpretive signage.

The proposed project includes the following, all of which are in disadvantaged neighborhoods:

- Installation of sewer lines in un-sewered neighborhoods, along with sewer line pipe size expansion along a critical infrastructure line.
- Installation of 57 working drinking fountains throughout the Project Area.
- Transformation of 3-miles of S. 5<sup>th</sup> Ave into a complete street, with sidewalks and/or a separated Greenway path and swale.
- Installation of a 6-mile Greenway Trail loop connecting S. 5<sup>th</sup> Ave along the lava cliffs and railroad tracks to the existing Greenway.
- Interpretive signage for area petroglyphs, in conjunction with the Shoshone Bannock Tribes.
- Stormwater infrastructure at Centennial and Rainey Parks, including redoing the gravel parking lot and adding tree plantings.
- Stormwater infrastructure at Constitution Park, including redoing the parking lot with added tree plantings.

This work will benefit the entire Pocatello community by: 1) improving water quality in the Lower Portneuf Valley Aquifer, the sole source of drinking water for the community; 2) providing access to drinking water at local parks; 3) improving mobility for pedestrians and cyclists along a heavily utilized corridor; 4) improving air quality by reducing vehicle miles travelled and by planting trees; and 5) protecting surface water through implementation of stormwater infrastructure.

The proposed project includes features that are in existing plans or design phases so that they can be completed within the three-year period of performance.



## Section B. Project Workplan

### Part 1. Community-Driven Investments for Change

#### 1.1 Community Vision Description (10 points)

##### Community Description

*Provide an overview of the community to benefit from the projects in the application based on the Project Area map submitted and how they will benefit from the projects. The community description should describe the community's resources, assets, local community characteristics, and the type of benefits the grants will provide to the community.*

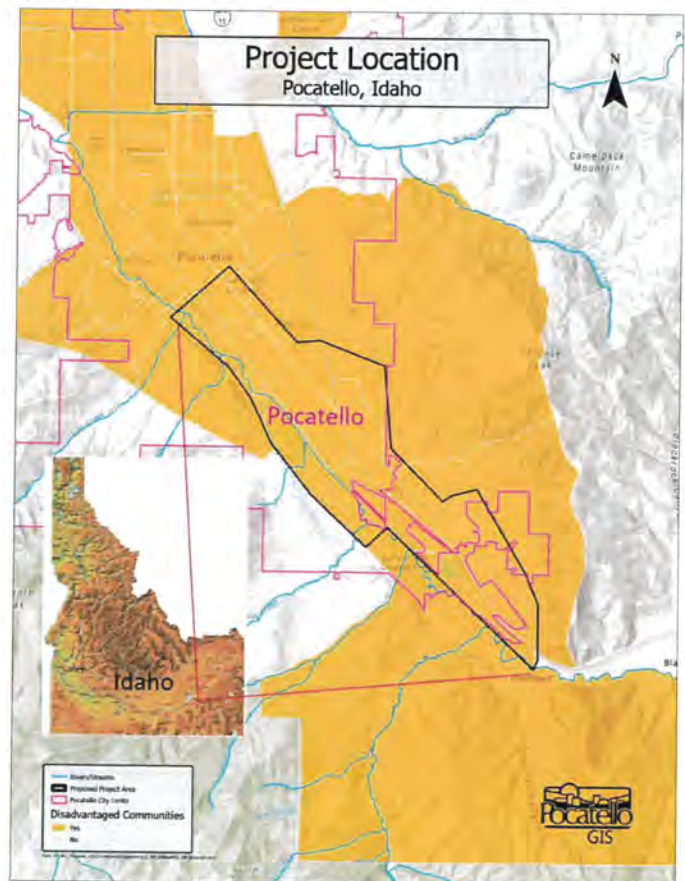
##### **Community Characteristics**

The proposed project focuses on the southern half of the city of Pocatello, Idaho, which includes a mix of residential, commercial, and industrial neighborhoods (see Figure 1). This area includes:

- The Mountainview Neighborhood, a local neighborhood along S. 5<sup>th</sup> Ave. which is designated as primarily low- and moderate-income per HUD income guidelines. In addition, the project area census tracts are historically disadvantaged communities per the Climate and Economic Justice Screening Tool (CEJST).
- A number of public facilities are located along S. 5<sup>th</sup> Ave. such as the Bannock County jail, Pocatello Regional Transit Authority, Bannock County Motor Vehicle offices, Century High School, local offices for the U.S. Forest Service, Bureau of Land Management and wildland firefighting team, and Idaho State Police. In addition, there are public parks, such as Constitution Park, Ross Park, and two cemeteries. Pocatello's

recently adopted Comprehensive Plan, *Our Valley | Our Vision*, anticipates future land uses in this area to include mixed-use and housing development that will respond to the projected growth and needs of the valley through 2040 along with Commercial and Industrial uses further along S. 5<sup>th</sup> Ave. which will respond to economic development needs and necessitate the availability of adequate infrastructure such as sewer and stormwater.

Figure 1: Proposed project area. For larger image, see Attachment D





- Additionally, the proposed project S. 5<sup>th</sup> Ave. corridor is highly utilized by local runners and bicyclists and is the route for several local races, including the Bengal Triathlon and Pocatello Marathon. Several small, locally owned farms and ranches are located within the project area, along with locally owned events centers and athletic practice fields.
- Local characteristics of the community include numerous popular outdoor amenities along the Portneuf River, which runs through town and in the hills on either side of the Portneuf Valley, just outside of the proposed project area.
- The area is the historic homeland of the Shoshone-Bannock Tribes, particularly along the six-miles of proposed Greenway trail. The lava cliffs adjacent to the proposed Greenway trail contain historic petroglyphs, which will be protected with the proposed project.
- The Old Town Neighborhood, a low-income neighborhood adjacent to the Centennial/Rainey Park Project is at the north end of the proposed project area. This part of the proposed project area also includes two elementary schools and additional parks.

### **Project Benefits to Disadvantaged Residents**

The EPA community change grant presents a unique opportunity to anticipate these future infrastructure needs as well as respond to the current demand so as to ensure a more efficient and climate-resilient system that can accommodate future growth while responding to water and sewer needs.

- Project area residents will be engaged in planning and refining park and trail improvement plans. This engagement will be multifaceted and is a crucial component of creating more resilient neighborhoods. The proposed park improvements will ultimately improve community gathering spaces for residents.
- Proposed Complete Street improvements will improve access along South 5<sup>th</sup> Ave. where many residents currently walk in the street, and will foster less reliance on vehicle travel in this critical corridor. This will also improve air quality in adjacent neighborhoods. The Greenway trail along the base of the lava cliffs will also provide residents with the opportunity to engage with this distinct landscape feature and, through interpretive signage, also view the historic petroglyphs at the edge of the lava cliffs.
- Proposed sewer and water improvements will ensure access to clean drinking water throughout the City by limiting nitrate contamination from the project area and ensuring capacity exists for the increased system demand. Installing working drinking fountains at project area parks will also improve access to clean drinking water for all.
- The parks included in the proposal experience significant parking lot flooding during rainstorms, much of which overflows into the Portneuf River. Planned stormwater improvements will prevent this shallow stormwater flooding, improve park access, and reduce stormwater runoff.

### Community Challenges

*Describe the needs and challenges the community in the Project Area is facing, including climate impacts, climate change risks / exposures, and / or localized pollution. Describe the impact of these challenges on the community, and particularly on priority populations within the Project Area who are acutely exposed to and impacted by climate, pollution, and weather-related threats, and / or who exhibit acute vulnerabilities or susceptibilities to the impacts of environmental pollution. See footnote 3 for more information on priority populations.*

The proposed project has been designed to support people who are acutely exposed to and impacted by climate and pollution threats. The project area primarily includes the 160050006001, 160050008002, 160050007001, 160050016032, and 160050017001 census tracts, which are all listed as EPA IRA Disadvantaged Communities. These tracts have the following features:

- Over the 95<sup>th</sup> percentile for expected population loss rate,
- Over the 90<sup>th</sup> percentile for wildfire risk,
- 97-98<sup>th</sup> percentile for a lack of indoor plumbing, and
- Generally low-income, with most areas being in the 73<sup>rd</sup>-97<sup>th</sup> percentile for poverty.

While the tracts include other indicators, the features listed above will be addressed by the proposed climate resilience measures, including the enhanced transportation opportunities and infrastructure improvements. Overall, these indicators inform the need to address climate resiliency measures in the area and Pocatello as a whole. Planned improvements include:

- Modifying S. 5<sup>th</sup> Ave. into a Complete Street and installing Greenway trails and trees will improve air quality and will enhance alternative transportation opportunities.
- Improved water and sewer infrastructure will directly address high levels of nitrates in Pocatello's drinking water where the source is septic system effluent, and potable drinking fountains at most City parks will resolve current water quality issues.
- Planting trees and installing stormwater infrastructure in two area parks will reduce stormwater runoff to the Portneuf River, which is Total Maximum Daily Load (TMDL) listed for sediment, a major stormwater pollutant.

### **Drinking Water Challenges**

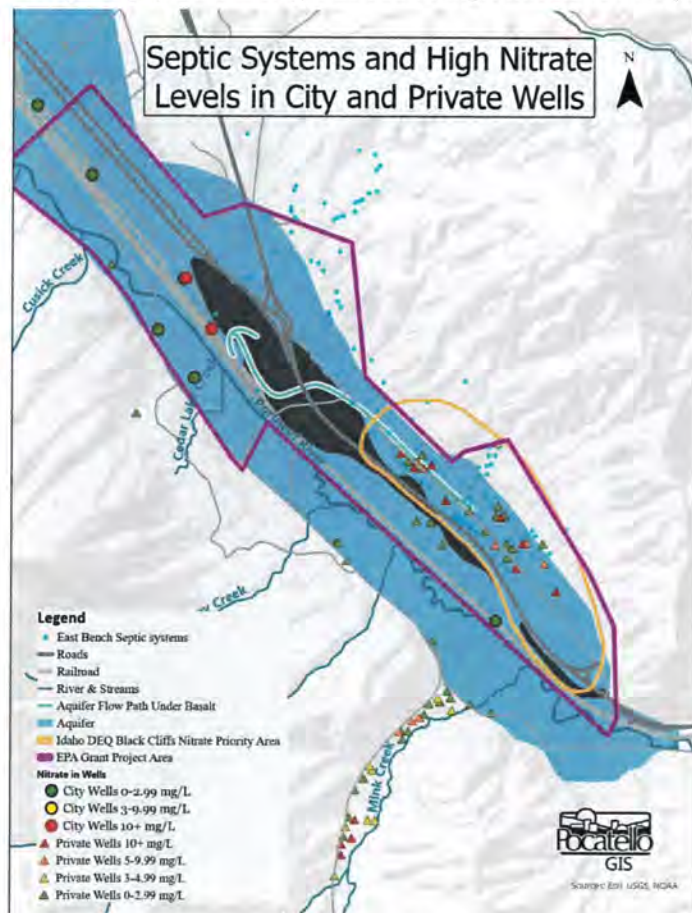
*Figure 2: Septic System along S. 5th impacting City wells. (see Attachment D for larger image)*



The Idaho Department of Environmental Quality (Idaho DEQ) has found high nitrate levels (up to 28.68 mg/L) in many private wells in the proposed project area, due to septic effluent from 200 area septic tanks. This area is listed as the Idaho DEQ's Black Cliffs Nitrate Priority Area. Extensive investigations have found that these nitrates have contaminated two nearby City wells, necessitating expensive well re-drilling (see Figure 2). Drilling logs and water chemistry data indicate that groundwater flow paths exist from the proposed project area through and under the basalt to two City wells.

The proposed project's implementation of sanitary sewer connections (within the Nitrate Priority Area in Figure 2) will improve protection of drinking water by preventing nitrate seepage into the local water supply, including nearby private wells. This will also improve property values

due to potential redevelopment of surrounding vacant or underutilized lots. Additional sewer system improvements with the proposed project will improve system capacity for handling large flow volumes. This will be necessary for any large commercial or industrial developments.



### Non-motorized Challenges

S. 5th Ave. is a principal arterial with a posted speed limit of 45 mph and accommodates over 14,000 vehicles per day. At this time, there are few to no sidewalks connecting pedestrians or cyclists from the edge of the City's Greenway (which connects to Downtown Pocatello) to various public buildings (Bannock County Jail, Pocatello Regional Transit Authority, Bannock County Motor Vehicle offices, and Idaho State Police) and Century High School (see Figure 4 for existing conditions). Transforming this corridor into a Complete Street with sidewalks and a Greenway Trail will greatly improve access for the disadvantaged population that lives in the area, many of whom lack motor vehicles and are forced to walk in the street alongside 45 mph traffic.



Figure 4: Existing Conditions along S. 5<sup>th</sup> Ave.



#### **Park Improvement and Stormwater Challenges**

Two parks have been selected for improvements with this funding. These parks suffer from flooded parking lots and associated flooded roadways, and have a lack of infrastructure improvements. Funding will be used to engage neighboring communities in park improvement planning to create community gathering spaces that also provide much needed stormwater improvements and have shaded parking lots.

- Rainey and Centennial Parks (see Figure 5 for existing conditions) – These parks are located across the Portneuf River from each other and will be treated as one park. A Bureau of Reclamation (BOR) WaterSmart grant has been received to make wetland and riparian improvements, and 60% design has been completed. Design also includes redesigning the parking lots and parks themselves. The proposed project would complement the BOR- funded effort with parking lot and park improvements to create shaded parking lots and pavilions that also provide for stormwater mitigation. Other improvements would be added based on community input, including from the adjacent Old Town Neighborhood.
- Constitution Park (see Figure 6 for existing conditions) – This park is located along S. 5<sup>th</sup> Ave. and has not had any park planning completed yet. The Mountainview Neighborhood would be engaged in park planning efforts to ensure that implemented improvements meet the needs of this neighborhood. The project includes stormwater treatment and infiltration.



**Figure 5: Centennial and Rainey Park Parking Lot, which floods during storm events**



**Figure 6: Constitution Park. Roadway and parking lot flood during storm events.**



### Community Vision

*Articulate a vision for the impact and benefits the grant would have on the community in the near and long term, including the effect it will have on reducing and preventing pollution; building resilience to climate change and mitigating current and future climate risks; creating high-quality jobs and expanding economic opportunity through workforce development; and bolstering community strength by insuring that local residents receive the benefits of investments and have the opportunity to build on them for current and future generations.*

The proposed project will have long-lasting benefits to the community, building resilience to climate change and mitigating climate risks. The City's vision is to create a resilient community in south Pocatello, with access to clean drinking water, neighborhood parks that the community helped design, and alternative transportation pathways that the community will use to access amenities and resources.

- Connecting neighborhoods along S. 5<sup>th</sup> Ave. to sewer lines will improve the health of the aquifer which serves as the sole source of drinking water for the community and will have long-lasting impacts for the region. In particular, the proposed project will decrease nitrate pollution into the aquifer, which is contaminating private and municipal wells.
- Access to potable water at the City's parks will not only resolve a drinking water health and safety issue but also improve access for disadvantaged communities in the proposed project area and encourage use of parks and greenspaces.
- The installation of the Greenway and modifying S. 5<sup>th</sup> Ave. to be a Complete Street will improve walkability and bikeability, resulting in reduced vehicle pollution, improved



- health outcomes from multimodal (active) use, and improved access to resources, all of which address Social Determinants of Health (SDOH) and impact climate resiliency.
- The proposed park improvements and associated community engagement will build community gathering spots and increase neighborhood engagement with the City, a crucial component of long-term resilience.
  - As an equal opportunity employer, the City intends to include a DBE goal when bidding the project, equivalent to other projects managed with State or Federal projects currently ongoing within the City. Current goals are 15%-25% of overall project total. The City will utilize the State of Idaho DBE registrar to verify participation and engagement. The City promotes all DBEs and utilizes the State of Idaho Associated General Contractors certified list of DBEs. The City complies with Idaho Code 67-2805, the Procurement of Public Works Construction and commits to fair and transparent bidding practices. The City is an Equal Opportunity Employer. The City commits to notifying the union of the bidding package at the time of publication.
  - The City and Idaho State University enjoy healthy relationships, including the coordination of job fairs and internship opportunities. ISU currently provides internships continuing education for trades, including building professionals, OSHA Safety Training, Traffic Control, HVAC, plumbing, and electrical professionals through its Continuing Education and Workforce Training Program. The City is ideally situated to utilize that trained workforce.

Other related benefits that meet the long-term vision of the community include the expansion of economic opportunity for the corridor, in alignment with the City's Comprehensive Plan goals. The sewer infrastructure will result in business development opportunities; the City's future land use map shows complementary uses for this area in the future. Further, the development can create high-quality jobs and expand economic opportunity through workforce development, and bolstering community strength by ensuring that local residents receive the benefits of investments and have the opportunity to build on them for current and future generations.

## 1.2 Selected Strategies

### Strategy Overview (15 points)

*For each selected Climate Action and Pollution Reduction Strategy: Provide an overview of the strategy and associated projects and describe how they will be implemented during the grant term. Describe how the strategies and associated projects in the application are integrated and/or designed to complement each other to benefit the disadvantaged communities Explain how the amount/proportion of the requested funding was determined for each strategy and associated project in the application.*

The S. 5th Sewer and Infrastructure project incorporates three Climate Action Strategies and one Pollutant Reduction Strategy to address climate impacts, risks, and challenges facing the project area with the goal of reducing greenhouse gas emissions and creating a community resilient to climate impacts.

### **Climate Action Strategy 1: Green Infrastructure and Nature-based solutions**

Two parks will serve as demonstration sites for stormwater and community-guided improvements in park areas (see Attachment D for locations). This intense community

engagement in park design will create long-lasting connections that will further community resilience when future issues arise. The City of Pocatello's recently updated Comprehensive Plan indicates that the Pocatello community highly values parks and outdoor spaces and wants the City to invest in these resources. The two selected parks are projects where the design can be completed and implemented within this grant's 3-year timeframe. The tree canopy will be expanded to cover the parking areas in these parks, which will improve stormwater management and provide shade for users.

Additionally, stormwater improvements will be implemented along the S. 5<sup>th</sup> Complete Street project by installing swales or other stormwater features along this three-mile corridor where applicable to reduce stormwater outflow to the Portneuf River, protect water quality, and reduce the concrete and urban heat island effect of this corridor. At present there is little planted vegetation and few stormwater features along this corridor, resulting in frequent stormwater sheet flows onto adjacent private property.

### **Climate Action Strategy 2: Mobility and Transportation Options for Preventing Air Pollution and Improving Public Health and Climate Resilience**

This project will create a fully accessible, pedestrian/cyclist loop in Pocatello, via the transformation of three miles of S. 5<sup>th</sup> into a Complete Street with sidewalk and/or Greenway Trail (see Attachment D for concept cross section and location within the proposed project area) that connects existing Greenway (which connects to City Center) with the government buildings and high school along S. 5<sup>th</sup> Ave. This Complete Street will be looped to connect to existing Greenway Trails with the installation of six miles of Greenway Trail through an underutilized area of the City adjacent to lava cliffs with only three access points to vehicular traffic (one access point at either end and one access point in the middle). The City of Pocatello will work with the Shoshone-Bannock Tribes to interpret this area, which was their historic homeland. This includes preserving petroglyphs contained within the lava cliffs and providing limited access to them where appropriate.

The three-mile Complete Street project along S. 5<sup>th</sup> corridor will create a viable alternative transportation option along this arterial. The 5-lane road includes the Pocatello Regional Transit, Bannock County Jail, Bannock County DMV, and Century High School, yet few to no pedestrian facilities exist along this corridor. The multimodal transportation alternatives will reduce the number of vehicles traveling by allowing for and encouraging alternative transportation options. This will reduce greenhouse gas emissions but also create public health improvements through increased exercise options.

The six miles of proposed Greenway Trail are in a unique area of Pocatello at the base of its lava cliffs, along historic river oxbows. The Greenway is the primary multimodal path through the City, allowing for bicyclists, pedestrians, and other users to accessibly recreate and traverse across the City, connecting users to the Portneuf River, mountain trails, lava cliffs, and neighborhoods. As noted, the greenway connections will remove vehicles from the road but also improve health outcomes, and enhance quality of life by improving access to mountain trails, the river, and their recreational opportunities. These proposed infrastructure improvements (sidewalks and Greenway trails) will reduce vehicle miles traveled and related air pollution by



providing safe routes for zero-emission travel between residences, workplaces, commercial center, community centers, and schools.

### **Climate Action Strategy 3: Energy-Efficient, Healthy, and Resilient Housing and Buildings**

The installation of the S. 5th sewer line (see Attachment D for plans) will allow existing and future residents to connect to City sewer, reducing nitrate infiltration into the City's aquifer and reducing nitrate levels in private and municipal wells. As previously discussed (see Community Challenges), the area is currently designated as the Idaho Department of Environmental Quality's Black Cliffs Nitrate Priority Area and has resulted in the closure of two city drinking water wells and ongoing numerous private wells with nitrate levels exceeding the MCL of 10 mg/L. The proposed project aims to mitigate this issue.

Project sewerage will preserve and protect groundwater resources by reducing nitrate infiltration into the City's groundwater. This will reduce the need to re-drill municipal wells to avoid nitrate contamination in the future. The project proposes installation of the sewer in an area that includes a historically disadvantaged census block per the CEJST and a census tract that is ranked 63rd (out of 65th percentile) for low-income. While not a specifically designated Historically Disadvantaged Census tract, the sewer would connect an existing mobile home park, which has a high concentration of low- and moderate-income residents that access City social service programs.

As part of the program, the City will allow for a graduated cost reduction for those private residences seeking to connect to City sewer. For qualifying applicants who meet low-income qualifications, the connection rate will be partially or fully grant funded. This will be determined on a graduated rate so that income is not a barrier to the installation of the upgraded infrastructure. The goal is to maintain and preserve the City's existing affordable housing stock so that residents are not displaced, as well as make the housing more resilient so it has improved infrastructure that resolves the public health concerns caused by the septic systems, leaching fields, and overall nitrate issues. This will have compounding positive impacts on the City's water source and water quality as well.

### **Pollution Reduction Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience.**

The proposed project will increase system resilience to climate change through septic to sewer conversions (see Attachment D for plans). As previously discussed this will protect the municipal water supply from known contamination sources. Upsizing a City sanitary line will also provide protection to the City's drinking water by improving capacity to limit installation of new septic systems.

Installing potable water via working water fountains at area parks (see Attachment D for plans) will provide disadvantaged residents with access to drinking water at neighborhood parks. This will improve the usability of these parks and will reduce reliance on bottled water.

Finally, providing for stormwater treatment at two neighborhood parks (see Attachment D for plans) will improve surface water quality. These two parks have significant shallow flooding of

their parking lots, which are highly degraded and lack trees for shading. The proposed project will retrofit these parking lots to address shading and stormwater needs.

**Timeline and funding:**

All projects will be designed and permitted in Year 1, including project outreach and community involvement. Project implementation will occur in Years 2-3. The following chart details the amount of funding estimated for each strategy and the portion of the total project that represents:

Strategy	Project Elements	Total Funding (\$)	Proportion of Project Costs (%)
<b>Climate Action Strategies</b>			
Strategy 1: Green Infrastructure & Nature-Based Solutions	Park Stormwater Projects	\$2.75M	41%
	Complete Street Project	\$4M	
Strategy 2: Mobility and Trans. Options for Preventing Air Pollution & Improving Public Health & Climate Resilience	Complete Street & Greenway	\$8.1M	49%
Strategy 3: Energy-Efficient, Healthy, & Resilient Housing & Buildings	Sewer Connection Program	\$4.25M	26%
<b>Pollution Reduction Strategies</b>			
Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience	Sewer Connection Program	\$4.25M	51%
	Potable Water	\$1.33M	
	Park Stormwater Projects	\$2.75M	

- **Sanitary sewer lines:** Project work is at 60% design with budget determined by City Engineering staff based on costs for similar projects.
- **Complete Street and Greenway:** Concept work has been completed. Project will occur entirely on City, County, and ITD Right-of-Way, with options to purchase private access easements if feasible, based on final design needs. Cost was determined by City and contracted Engineering staff based on similar projects in the area.
- **Park improvements:** Centennial/Rainey Park improvements are at 60% design. Cost was determined by contracted Engineering Firm based on similar projects in the area. Centennial Park is at concept phase and costs were determined by City Engineering staff based on similar projects in the area.
- **Drinking fountains:** Project is at concept phase. Costs were determined for each needed drinking fountain by Parks and Engineering staff based on similar projects in the City.

Climate Action Strategies (15 points)

*Describe how the project(s) associated with the Climate Action Strategy(ies) will address the climate impacts, risks, and/or challenges facing the Project Area community; will decrease GHG emissions within the Project Area and increase overall community resilience to current and*



*anticipated climate impacts; and are responsive to the community needs and challenges identified in the Community Vision Description.*

The projects associated with the three noted strategies will address climate impacts, risks, and challenges faced by the Project Area community. The proposed project elements will decrease greenhouse gas emissions and increase overall community resilience to climate impacts and directly relate the Community Vision Description.

Primarily, the septic to sewer connections will have notable public health and climate improvements in terms of water quality, protecting the City's water resources, and long-term infrastructure resilience. As noted, the conversions will resolve nitrate infiltration issues. These improvements will allow residents to connect to sewer and create more healthy and resilient housing, but will also directly improve health outcomes for residents. The EPA notes that "if drinking water contains unsafe levels of contaminants, it can cause health effects, such as gastrointestinal illnesses, nervous system or reproductive effects, and chronic diseases such as cancer"<sup>1</sup>. By improving water quality, the City will address long-term health outcomes for residents.

The installation of a Complete Street on S. 5<sup>th</sup> Ave. and Greenway trails will encourage alternative methods of transportation for the project area, reducing greenhouse gas emissions from vehicles and encouraging non-vehicle trips. According to the USDOT, there are numerous monetized benefits from installation of alternative vehicle transportation modes. This includes not only safety benefits from having a buffered, usable path but also: the addition of bicycle facilities and related induced trips; addition of pedestrian facilities and related induced trips; and mortality reduction benefits from the bicycle and pedestrian trips. An analysis of existing census data indicates that approximately 0.8% of the project area census block populations are cyclists. Based on various studies, the addition of a bidirectional path can increase ridership from 21% to 171%<sup>2</sup>. There is a similar outcome for induced walking trips. This could result in substantial reductions in greenhouse gas emissions, as alternative transportation trip (cycling or walking) can reduce the carbon footprint of a trip by up to 75%. In addition to the GHG emissions reductions from induced (new) trips, there are other potential reductions through:

- Travel Time Savings (vehicles) - Induced alternative transportation trips would result in fewer vehicles on the road leading to improved traffic flow, less vehicle idle time, and more efficient travel on S. 5<sup>th</sup> Ave.
- Travel Time Savings (Walking, Cycling) – It is reasonable to conclude that walking and cycling travel time will be dramatically improved by the project, as it will create a direct, dedicated bicycle lane and myriad pedestrian improvements
- Damage Costs for Emissions per Metric Ton – Emission types were not available for commercial vehicle estimates. It is reasonable to anticipate benefits from improved traffic flow at the newly configured intersections and reduced emissions resulting from induced pedestrian and cycling trips (for personal vehicle emissions).
- Transit Facility Amenity Revealed and Stated Preference Value; Transit Vehicle Amenity Values; Transit Mode Ride and Boarding Quality Revealed Preference Values – The

<sup>1</sup> <https://www.epa.gov/report-environment/drinking-water#:~:text=metals%2C%20or%20radionuclides,-Effects%20on%20Human%20Health,chronic%20diseases%20such%20as%20cancer.>

<sup>2</sup> <https://nacto.org/2016/07/20/high-quality-bike-facilities-increase-ridership-make-biking-safer/>



proposed project does not include transit related upgrades and therefore this is not applicable. However, the improved sidewalks and pedestrian travel will improve access to existing transit stops. This may result in increased ridership or induced rides.

Addition of potable water at the city's parks will also incentivize use of the parks and protect water resources. Improvement of the City's parks can lead to many climate-related benefits as well. Parks, in particular trees, can combat excessive heat and provide a cooling benefit that will help cool urban heat islands. The installation of proper stormwater management, vegetation, and swales will help minimize and mitigate flooding while improving the water quality. This green infrastructure will affect climate related measures positively. In addition, an urban tree canopy can remove several metric tons of air pollution and filter particulate matter from automobiles and vehicles to help clean the air. The proposed park improvements will also incentivize the use of parks and improve stormwater management, reducing contamination of surface waters.

#### Pollution Reduction Strategies (15 points)

*Describe how the project(s) associated with the Pollution Reduction Strategy(ies) will address the localized pollution challenges facing the Project Area communities; will make substantial and measurable (i.e., quantifiable) progress towards preventing, reducing, and / or mitigating existing and future sources of pollution to benefit the Project Area; and are responsive to the community needs and challenges identified in the Community Vision Description.*

Connecting homes to the sanitary sewer system, improving non-motorized mobility options, improving stormwater treatment, and installing working drinking fountains at area parks will meet the needs and challenges of the local area through reduced nitrate contamination of drinking water, improved mobility, and other impacts to health identifiers. The census tracts included in the project are at the 97-98<sup>th</sup> percentile for lack of indoor plumbing, over the 95<sup>th</sup> percentile for population loss rate, over the 90<sup>th</sup> percentile for wildfire risk and generally in the 73-97<sup>th</sup> percentile for poverty. Overall, these indicators inform the need to address climate resiliency measures in the area and Pocatello as a whole.

Improving water quality significantly improves health outcomes and allows for less expenditure on health, as people are less likely to fall ill and incur medical costs and are better able to remain economically productive. In particular, consuming too much nitrate can affect how blood carries oxygen and can cause methemoglobinemia also known as blue baby syndrome. A growing body of literature indicates potential associations between nitrate/nitrite exposure and other health effects such as increased heart rate, nausea, headaches, and abdominal cramps. Reducing the risk of nitrate contamination is particularly important in the proposed project area where many homes are on wells – and these wells repeatedly test above the legal limit for nitrate. This strategy fits with the National Climate Resilience Framework, Objective 3: Mobilize capital, investment, and innovation to advance climate resilience at scale. This will help the community to better prepare for climate impacts and alleviate longstanding inequities within the community. The American Public Health Association has identified how the most at-risk populations are most affected by poor water quality and stated that local governments should prioritize investments in remediation where the water or wastewater infrastructure poses health risks.<sup>3</sup> Improvements to mobility and

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<sup>3</sup> American Public Health Association

[https://www.apha.org/media/files/pdf/topics/equity/water\\_health\\_equity\\_factsheet.ashx](https://www.apha.org/media/files/pdf/topics/equity/water_health_equity_factsheet.ashx)



clean water infrastructure will reduce the impacts of climate impacts on this already at-risk population.

Groundwater quality data will be used to evaluate the effectiveness of plan implementation and to provide substantial and measurable progress towards reducing and/or mitigating existing and future sources of pollution to benefit the Project Area. Along with groundwater data, the number of permits issued for new septic systems will be monitored and compared to historic data to demonstrate a reduction in possible contamination sources to the aquifer.

Finally, the project expects to see improvements to human health from increased park use based on having access to drinking fountains and access to non-motorized transportation options in the Mountainview Neighborhood. This will also reduce dependency on bottled water. The proposed park amenities, including shaded parking, will also increase use. The proposed stormwater improvements at these two parks and along the Complete Street will result in less sediment being discharged to the Portneuf River. Sediment is the primary pollutant in the Portneuf River.

The selected projects are responsive to the community needs and challenges identified in the Community Vision by providing the benefits of clean water to the community, reducing contamination of the groundwater, protect aquifer, improving the safety of transportation through a complete streets program, increasing walkability, reduced vehicle pollution, improved health outcomes from multimodal, improved access to resources (addressing SDOH), and bolstering community strength by insuring that local residents receive the benefits of investments and have the opportunity to build on them for current and future generations.

1.2 Community Engagement and Collaborative Governance Plan (Attachment E)

1.3 Community Strength Plan (Attachment F)

## Part 2. Program Management, Capability and Capacity

### 2.1 Performance Management Plan, Outputs/Outcomes

The City intends to measure the following outputs and projected outcomes:

Strategy	Outputs	Outcomes
<b>Climate Action Strategies</b>		
<b>Strategy 1: Green Infrastructure and Nature-Based Solutions</b>	<ul style="list-style-type: none"> <li>• Complete streets with stormwater infrastructure (miles/gallons stormwater)</li> <li>• Greenway trail (miles)</li> <li>• Park improvements with stormwater infrastructure (acres)</li> <li>• Shade tree canopy (# of shade trees)</li> <li>• Neighborhood engagement (#)</li> </ul>	<ul style="list-style-type: none"> <li>• Increased community resilience as measured by reduced damage and recovery costs for infrastructure, property, and cultural resources</li> <li>• Improved surface water quality</li> <li>• Increased canopy coverage</li> <li>• Preservation of Native American cultural resources</li> </ul>
<b>Strategy 2: Mobility and Transportation Options for Preventing Air Pollution and Improving Public Health and Climate Resilience</b>	<ul style="list-style-type: none"> <li>• Complete streets (miles)</li> <li>• Greenway trail (miles)</li> <li>• Neighborhood engagement (#)</li> </ul>	<ul style="list-style-type: none"> <li>• Increased availability of safe walking &amp; biking surfaces</li> <li>• Increased bike/pedestrian traffic counts</li> <li>• Reduced air pollution from transportation</li> </ul>
<b>Strategy 3: Energy-Efficient, Healthy, and Resilient Housing and Buildings</b>	<ul style="list-style-type: none"> <li>• New sewer line connections to residential homes (#)</li> <li>• Neighborhood engagement (#)</li> </ul>	<ul style="list-style-type: none"> <li>• Decreased levels of nitrates in City drinking water wells</li> </ul>
<b>Pollution Reduction Strategies</b>		
<b>Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience</b>	<ul style="list-style-type: none"> <li>• Drinking fountains installed at parks (3)</li> <li>• Sewer lines (miles) and connections (# - up to 60)</li> <li>• Complete streets with stormwater infrastructure (miles)</li> <li>• Greenway trail (miles)</li> <li>• Park improvements with stormwater infrastructure (acres)</li> </ul>	<ul style="list-style-type: none"> <li>• Decreased levels of nitrates in City drinking water wells</li> <li>• Increased availability of clean, safe drinking water</li> <li>• Improved surface water quality</li> <li>• Decreased stormwater discharge to surface water</li> <li>• Increased bike/pedestrian traffic counts</li> </ul>

### 2.2 Project Linkages to EPA Strategic Plan (4 points)

The project directly aligns with the EPA strategic plan Goal 1: Tackle the Climate Crisis; Goal 2: Take Decisive Action to Advance Environmental Justice and Civil Rights; Goal 4: Ensure Clean and healthy Air for All Communities; Goal 5: Ensure Clean and Safe Water for All Communities; and Goal 6: Safeguard and Revitalize Communities.



Working towards Goal 2, the project takes place in a historically disadvantaged area and works to address public health and safety as well as climate resiliency needs of low- moderate income populations as well as underserved communities.

The other EPA strategic goals are achieved through resilience measures that will protect the city's water supply by connecting septic systems to the sanitary sewer system, reduce greenhouse gas emissions as a result of the increased accessibility and use of alternative transportation methods from the proposed Complete Street and Greenway Trail, improve surface water quality through the implementation of stormwater features, and improve access to clean water by installing drinking fountains in City parks.

Finally, the project will revitalize the area, making it walkable and improving access to open spaces and public spaces through the potable water projects and complete streets approach.

### 2.3 CBO Experience and Commitment *(5 points)*

The City of Pocatello is a municipal corporation of Idaho (local government entity) and has extensive experience managing programs and grants for the public sector. The City is responsible for the proper administration of tax funds levied from the Pocatello citizens and as such achieves this in its daily operations. The City will partner with the Portneuf Greenway Foundation on the Community Change grant. The Greenway Foundation is a 501(c)3 non-profit organization that was established in 1992 and is governed by a volunteer board of directors. The Greenway Foundation's mission is to create a network of paved bicycle and pedestrian trails throughout the greater Pocatello Chubbuck area to enhance the quality of life for residents and visitors by establishing and improving the Portneuf Greenway as a community resource. Development of the Portneuf Greenway is guided by the Portneuf Greenway Master Plan and a supporting Capital Investment Plan. Though the Greenway Foundation focused on establishing trails along the Portneuf River initially, the broader vision is to connect a comprehensive trail system throughout the Pocatello and Chubbuck communities respectively.

The project proposal will occur in the City's identified disadvantaged communities and provide public health improvements, safety, and other resources directly to these communities. The City and the greenway Foundation are committed to addressing these needs. Through the proposed engagement and outreach efforts, the project proposal will have meaningful input from these groups. The City and Greenway Foundation have extensive experience gathering input as demonstrated by the myriad plans completed by the organizations over the last decade. These plans include the Portneuf Greenway Masterplan as well as the Portneuf River Vision and Downtown Pocatello Plan. For these plans online surveys were conducted along with Open Houses in neighborhoods, and flyers distributed door to door in disadvantaged areas.

In addition, the improvements, particularly the sewer connections, will be incentivized and allow for a cost reduction and grant program so as to allow low-moderate income residents to connect without a financial burden. This will allow for disadvantaged communities to realize the benefits of the proposed measures.



2.4 Programmatic and Managerial Capability and Resources (15 points)

The City of Pocatello has a robust staff with extensive experience managing large-scale construction projects including those relying on federal and state funding. The City works collaboratively with state and federal agencies to ensure projects are completed on time, within budget, and within the proposed project schedule. In addition, the City implements policies and procedures as well as project oversight to address any issues as they arise and respond efficiently and effectively to potential issues such as cost changes, unforeseen circumstances, and other potential delays. Project cost estimating and planning also incorporate contingencies and a conservative approach to anticipate potential issues that may arise and alter project costs, timelines, and deliverables. Through proper planning and project management, the City anticipates project challenges and proactively addresses them.

To effectively do this, the City employs Public Works Engineering Staff, including a Public Works Director/City Engineer, Public Works Project Manager, Environmental Division Manager, and a number of engineers. In addition, the City employs a Grants Manager who has expertise specifically in federal grant management, to ensure compliance with grant terms and conditions, grant requirements, federal uniform standards, and all related requirements, such as record retention, eligibility of costs, cost allocability and allowability, accounting standards, and more. The City has a full complement of finance department staff who ensure internal controls are met prior to processing payments and receipting in grant funds. Grant funded projects are tracked using project codes and are kept in separate grant funds.

As a municipal corporation, the City of Pocatello is a responsible steward of taxpayer dollars and is held to standards related to the proper management and use of public funds. The City has adopted financial policies and procedures in accordance with Generally Accepted Accounting Principles and the Governmental Accounting Standards Board, and undergoes an independent audit annually. Internal check and balances, including acceptance of payments, contractors, authorization for agreements, and more all occur at the City Council level at public meetings. In addition, the City has adopted ethics policies as well as a mission and vision statement it adheres to and incorporates in its routine business operations. All of these adopted controls will mitigate risk and work to identify waste, fraud, and abuse, and reduce the potential for waste, fraud, and abuse, by including plans and policies for program oversight, including confidential reporting.

The following milestone table will assist in ensuring timely and proper expenditure of federal funds within the three-year period of performance:

Task	Planned Start Date	Planned Completion Date
Award, Grant Agreement and Project Start	9/2024	12/2024
Project Outreach to Neighborhoods	12/2024	6/2027
S. 5 <sup>th</sup> Sewer Final Design	12/2024	3/2025
S. 5 <sup>th</sup> Sewer Construction	4/2025	12/2025
S. 5 <sup>th</sup> Sewer Connections	1/2026	3/2027
Greenway Trail & Complete Street Final Design	1/2025	8/2026
Greenway Trail & Complete Street Construction	9/2026	6/2027
Park Drinking Fountains Design & Construction/Installation	1/2025	3/2027



Constitution & Centennial Park Final Design	12/2024	3/2026
Constitution & Centennial Park Construction	4/2026	6/2027
Closeout	6/2027	8/2027

### 2.5 Past Performance (5 points)

The City has completed a number of large infrastructure projects that utilized federal and non-federal funding and had associated assistance agreements. A number of these federal and non-federal assisted projects are underway and ongoing, such as the EPA Brownfield Community Assessment Grant (RFA#EPA-OLEM-OBLR-21-04, RAISE Grant (NOFO #DTOS59-23-RA-RAISE), Safe Streets and Roads for All (NOFO #20.939), WaterSMART (#R23AS00089), and USDA Urban Community forestry (#USDA-FS-2023-UCF-IRA 01). The City also is an entitlement community and manages a Community Development Block Grant program annually, ensuring compliance with all HUD requirements. In the last three years (between 2020 and 2023), the City completed the following major projects which had assistance agreements:

- **W. Carson Street, Portneuf River Bridge Project (Agreement Number A022(597), Key number 22597):** The City was awarded funding through the Idaho Transportation Department to replace and construct a bridge across the Portneuf River at W. Carson St. The project was administered through ITD's Local Highway Technical Assistance Council, with separate Local Professional Service Agreement for Construction Engineering and Inspection. The City of Pocatello, as the Lead Applicant, participated in design review and approval, construction inspections, and final acceptance of the project. Meetings were held weekly and documented for project acceptance and completion. The project was completed in September, 2023 for a total cost of \$1,526,850.
- **Clark Street Pedestrian Improvement Project & Center Street Pedestrian Improvement Projects Agreement Number C1970PO, C22701S Identifying number 20.526, 20.513:** The City was awarded funding through the Idaho Transportation Department to install pedestrian improvements on Clark Street from 18<sup>th</sup> Ave. to Pocatello Ave. and on Center Street from 19<sup>th</sup> Ave. to 13<sup>th</sup> Ave. The improvements were aimed to improve mobility by removing barriers to transportation services. The projects were successfully completed over two years. The City managed all design of the projects, successfully procured the projects, managed construction, and submitted timely project updates and reports to the Idaho Transportation Department, including for compliance with testing requirements and Davis-Bacon requirements. The City managed all invoicing for the project and received reimbursement for the same from the granting agency, minus the match requirements. The total project cost between both projects was approximately \$600,000 and was complete September, 2023. The City successfully closed out the project with the granting agency.
- **Lead Hazard Control (HUD):** In 2017 the City was awarded a \$1.5M Housing and Urban Development Office of Lead Hazard Control and Healthy Homes (OLHCHH) Lead-Based Paint Hazard Control grant (IDLHB0655-17) for the mitigation and remediation of lead-based paint hazards in qualifying residential homes in Pocatello. The City successfully managed the grant and complied with all requirements including quarterly reporting, annual reporting, and all other grant terms and conditions. The program required compliance with the HUD Lead Safe Housing Rule, all OLHCHH program guidance, 2 CFR 200, and all internal policies and procedures, such as



procurement and contract oversight. The City successfully closed out the grant in 2021 and was awarded a second competitive OLHCC for Lead Hazard Control and Healthy Homes supplemental funding in 2021. The City established benchmarks for the program and reported on accomplishments each quarter to track progress and outcomes. This ensured management of the outputs and project budgets were spent on time and within the three-year period of performance. This tracking also allowed for any adjustments to program outcomes, budget, or timeline as needed.

### Part 3. Readiness to Proceed, Feasibility, and Sustainability

#### 3.1 Readiness Approach (8 points)

The City will be ready to proceed with the project within 120 days of award. The City has internal controls and processes that will allow for acceptance of the grant, completion and negotiation of the grant agreement, and initiation of the project. This includes all internal legal reviews and accounting requirements. The City employs staff to manage this process efficiently and immediately after award. In addition, the City has prepared bid document templates that comply with 2 CFR 200, so all final design and construction phases can begin immediately after procurement. The projects included in the application were chosen because there is partial design for all and final design will be achieved within the 3-year period of performance. All permits, permissions, and other requirements will commence upon award (see Attachment G).

#### 3.2 Feasibility (9 points)

These projects can be completed within the 3-year period of performance. The proposed project schedule allows for a conservative approach to final design completion (1-year) and 2 years for construction. It is anticipated that final design and construction will be completed in a much shorter time frame, but this allows for unforeseen circumstances and accounting for project delays that cannot be predicted, such as market conditions. The majority of the work is able to be completed using locally sourced materials (concrete, asphalt) and therefore risk is low. The project is in the City's schedule of capital projects and therefore other delays are not anticipated.

Additionally, significant design work has already been completed on the Centennial/Rainey Park improvements and the proposed sewer lines (60% design). City staff will spend Year 1 working with a contracted firm to design and conduct community engagement for the sidewalk/trail improvements, the Constitution Park improvements, and the drinking fountain improvements.

#### 3.3 Sustainability (5 points)

The project proposes infrastructure for sewer as well as mobility/transportation infrastructure that has a lifespan of 20 years. It is anticipated the benefits of these improvements will be realized for the lifespan of the infrastructure. In addition, the City employs Streets and Parks and Recreation Staff that maintain existing infrastructure (roads, sidewalks, pathways, and parks) and are committed to do so beyond the period of performance.

#### 3.4 Program Budget Description (see SF-424A and Attachment A) (8 points)

The primary project components consist of the design and construction of the Complete Street infrastructure (including non-motorized pathways and stormwater features) on S. 5th Ave., installation of sewer line in the neighborhoods adjacent to S. 5th Ave.; installation of Greenway



Trail along the base of the lava cliffs to create a loop path; installation of drinking fountains at the specified parks; installation of sewer carrier lines for the Indian Hills lift station, and stormwater and other park improvements at Centennial/Rainey Parks and Constitution Park.

To complete the proposed project, the budget primarily is comprised of contractual and construction costs. Additional expenses will be incurred for public outreach (including supplies) and project management. Project Management will be completed by City Staff and will incur personnel and fringe expenses. The budget is reasonable to accomplish the project and allows for value engineering in the event project costs exceed the estimates detailed here.

The cost estimates were determined as follows:

- **Personnel** – These costs reflect the average salary of the personnel identified for the fiscal years 2025, 2026, and 2027. The table also identifies the anticipated amount of staff time to be allocated to the grant during each project year for the staff person. This resulted in the total personnel expenses. It is anticipated additional staff time will be spent managing the project and will be funded through the City's general fund appropriations. The grant request for personnel was minimized as there is no match and it enables the City to direct more funds toward project implementation.
- **Fringe** – Fringe includes all benefits accompanying wages (medicare, social security, retirement, worker's comp, dental insurance, life insurance, medical insurance, vision insurance, other contributions) which are on average 30% per employee.
- **Supplies** – The project proposes a supply budget of \$45,000 to account for printing, outreach, marketing, events, and other materials needed to conduct community engagement for the project. This will include all materials to conduct the sewer connection grant program.
- **Contractual** – The project proposes \$100,000 for a consultant to conduct outreach and engagement for the program and project. This is anticipated to be spent over 2 years of the period of performance from 1/2025 through 1/2027
- **Construction** – As detailed in the chart, construction costs are comprised of final design and construction for the project elements. All costs were developed using in-house and contracted engineering firm estimates which are based on current design plans, recent similar project costs, and review of market costs. Construction costs include contingencies to account for market increases in future project years. All design costs are estimated to be 15% of construction costs, which is standard for City projects. The only exception is the potable water design (drinking fountains) which is estimated to be 10% of construction/install costs due to the less invasive nature of the project scope.
- **Other** – As recommended by the NOFO, the other costs include acquisition expenses (easements for the sewer connections, multi-modal path, and greenway) as well as the costs for sewer connections as incurred by the City. In addition, the grant program to incentivize connections is included in the Other costs and it is estimated 20 eligible applicants will apply for connection grants at approximately \$20,000 each. As noted, all project cost estimates are based on in-house estimates using current costs and projected increases over the period of performance.

### 3.5 Compliance Plan (See Attachment H) (10 points)

Attachment A - Program Budget Description



**Program Budget Description**

The primary project components consist of the design and construction of the infrastructure on S. 5<sup>th</sup> Avenue, which are composed of: installation of sewer line along S. 5<sup>th</sup> Avenue; construction of complete street along S. 5<sup>th</sup> Avenue including a bidirectional path with swale on the west side of S. 5<sup>th</sup> Avenue for three miles; installation of Portneuf Greenway along Portneuf River to connect S. 5<sup>th</sup> Avenue access with existing access on the eastern bank of the Portneuf River; replacement and installation of drinking fountains at the specified parks; installation of sewer carrier lines for the Indian Hills lift station; stormwater upgrades and park upgrades at Constitution Park; and ecological restoration and park improvements at Centennial Park. To ensure proper outreach and engagement, supplies and contractual expenses have been included as well as necessary staff time. In order to complete the expansion of the Greenway and multi-modal path, required acquisition costs have been budgeted. Finally, to incentivize connections to new sewer and assist target populations with connections, additional funding for sewer connections have been included.

To complete the proposed infrastructure items, the budget primarily will be comprised of contractual and construction costs. Additional expenses will be incurred to conduct public outreach and manage the project. Public outreach will include supplies. Project Management will be completed by City Staff and incur personnel and fringe expenses. The budget is reasonable to accomplish the project and allows for value engineering in the event project costs exceed the estimates detailed here.

The following Budget Template provides additional detail for the projected project expenses:

Category	Description	Total
Personnel	<u>Project Manager</u> <u>Annual Salary:</u> 39.61 \$82,395.73 % of time funded by grant portion: 5% Total: \$4119.79 x 3 = \$12,359.36 <u>Grants Manager</u> <u>Annual Salary:</u> 39.75 \$82,680 % of Time: 1% Total: \$828.60 *3 = \$2485.80 <u>Science and Environment</u> <u>Administrator</u> <u>Annual Salary:</u> (3 yr avg \$42.49) \$88,379.20 % of Time: 15% Total: \$13,256.88 * 3 years = \$39,770.64 <u>Development Engineer</u>	\$90,502.46

	<u>Annual Salary: 55.08</u> \$114,566.40 % of Time: 5% Total: \$5,728.32 x 3 = \$17,184.96 <u>Right of Way Inspector</u> <u>Annual Salary: 29.76</u> \$61,900.8 % of Time: 4% (80 hours per year) Total: 2476.03*3 = \$7428.10 <u>Parks Supervisor</u> <u>Annual Salary: 36.13</u> \$75,157.33 % of Time: 5% Total: 3757.87*3 = \$11273.60	
Fringe Benefits	Fringe is 33% of costs	\$29,865.81
Travel	N/A	0
Equipment	N/A	0
Supplies	Outreach, events, marketing materials	\$45,000
Contractual	Outreach services	\$100,000
Construction	<u>S. 5th Sewer (\$2.65M)</u> Final Design: \$350,000 Construction: \$2.3M  <u>S. 5th Complete Street - \$4M</u> Design: \$520,000 Construction: \$3.48M  <u>S. Valley Connector Casings</u> <u>(\$920,000)</u> Final Design: \$120,000 Construction: \$800,000  <u>Greenway (\$2.3M)</u> Design: \$300,000 Construction: \$2M  <u>Constitution Park Stormwater</u> <u>(\$500,250)</u> Design: \$65,250 Construction: \$435,000	\$13,730,250



	<u>Potable Water (\$1.11M)</u> Design: \$110,000 Construction: \$1M  <u>Centennial Park (\$2.25M)</u> Design: \$337,500 Construction: \$1,912,500	
Other (Separate by participant support costs, subawards, and other costs)	City costs for drinking fountain water connection which include time, materials, labor, and equipment. This will be completed by City Water Department and billed per project site. (\$220,000)  Sanitary Sewer Private Connections - 30 @ \$15,000 = \$400,000  Property easements/acquisition for Complete Street - \$1.7M  Greenway Trail property easements/acquisition \$100K (2 properties)	\$2,470,000
Total Direct Costs (sum of above categories)		\$16,465,618.27
Indirect Costs		
Total Project Costs (sum of direct and indirect costs)		\$16,465,618.27

The cost estimates were determined as follows:

**Personnel** – These costs reflect the average salary of the personnel identified for the fiscal years 2025, 2026, and 2027. The table also identifies the anticipated amount of staff time to be funded by the grant during the period of performance. Additional staff time will be dedicated to the projects but will be funded out of the City general funds. As match is not required, these funds are not reported here. The totals for each person resulted in the total personnel expenses.

**Fringe** – Fringe includes all benefits accompanying wages (additional pay, medicare, social security, retirement, worker’s comp, dental insurance, life insurance, medical insurance, vision insurance, other contributions) which are on average 33% per employee.

**Supplies** – The project proposes a supply budget of \$45,000 to account for printing, outreach, marketing, events, and other materials needed to conduct community engagement for the project. This will include all materials to conduct the S. 5<sup>th</sup> Complete Street project for the three-year period of performance.

**Contractual** – The project proposes \$100,000 for a consultant to conduct outreach and engagement for the program and project. This is anticipated to be spent over 2 years of the period of performance from 1/2025 through 1/2027 and will be a contracted service overseen by the nonprofit project partner.

**Construction** – As detailed in the chart, construction costs are comprised of final design and construction for the project elements. All costs were developed using in-house estimates which are based on current design plans, recent similar project costs, and review of market costs. Construction costs include contingencies to account for market increases in future project years. All design costs are estimated to be approximately 15% of construction costs, which is standard for City projects. The only exception is the potable water design which is estimated to be 10% of construction/install costs due to the less invasive nature of the project scope.

**Other** – As recommended by the NOFO, the other costs include acquisition expenses (easements for the sewer connections, multi-modal path, and greenway) as well as the costs for sewer connections as incurred by the City. In addition, the grant program to incentivize connections is included in the Other costs and it is estimated 30 eligible applicants will apply for connection grants at approximately \$15,000 each. Property easements will be needed for the bidirectional path extending along the western side of S. 5<sup>th</sup> Avenue and are projected to be \$1.7M, as calculated using a 3-mile project area and using current estimated for the cost per square foot of industrial and commercial land. In addition, acquisition of two parcels along the Greenway is estimated to be \$100,000. As noted, all project cost estimates are based on in-house estimates using current costs and projected increases over the period of performance.



Attachment B - Partnership Agreement

**PARTNERSHIP AGREEMENT**

**PROJECT NO. \_\_\_\_\_**

**COMMUNITY CHANGE GRANT**

**BANNOCK COUNTY, IDAHO**

This Partnership Agreement ("Agreement") is made and entered into this \_\_\_\_ day of \_\_\_\_\_, 2024. ("Effective Date"), by and between the CITY OF POCA TELLO ("City of Pocatello or City") and the PORTNEUF GREENWAY FOUNDATION ("Portneuf Greenway or Greenway"). Collectively, these entities may be referred to as the "Parties."

**RECITALS AND AGREEMENT**

A. The Parties intend to participate in a partnership so as to complete the projects identified by the City in the Environmental Protection Agency Community Change Grant application. These projects will hereinafter be referred to as the "Projects." The Parties believe that the Projects are desirable to mitigate contamination to the water supply by an overabundance of septic systems, to address safety concerns due to the lack of potable water in local parks, and to provide safe, adequate and efficient transportation, transit and recreational access. The Parties agree that the Projects are in the public interest.

B. The Parties enter into this Agreement to expedite funding, design and construction of the Projects. The Parties intend for the City of Pocatello to accept ownership, jurisdiction and control of any assets build under the Agreement.

C. This Agreement sets forth certain terms and conditions regarding the Parties' respective efforts, all of which shall be in accordance with the provisions of this Agreement and in accordance with applicable laws, rules, regulations and specifications.

D. The Parties are authorized to enter into this Agreement pursuant to Idaho law, including but not limited to Idaho Code §40-317.

NOW THEREFORE, for and inconsideration of the mutual covenants and consideration in this Agreement, and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties agree as follows:

**SECTION. 1**  
**GENERAL OBLIGATIONS**

Identification of Parties. The Parties agree that the City will be the Lead Applicant for the Projects and the Portneuf Greenway will be the Statutory Partner.

Governmental Approvals. The Parties shall cooperate as necessary to obtain any governmental approvals needed for the Projects.

Regulations. All work on the Projects shall be performed in accordance with applicable laws, ordinances, regulations, policies, procedures, and guidelines for state highways and local roads.

Access to Information. The City of Pocatello shall provide the Greenway Foundation with access to all previously- completed designs, plans, specifications, reports, data and other materials (both electronic and hard copy) produced by its agents and contractors prior to this Agreement.

Environmental Matters. The Parties shall cooperate as necessary to comply with environmental regulations applicable to the Projects.

Right-of-Way Acquisition and Dedication. The City of Pocatello reserves the right to coordinate or pursue right-of-way acquisition.

## **SECTION. 2** **ROLES AND RESPONSIBILITIES FOR PROJECTS ACTIVITIES**

The City is responsible for all project activities relating to clean water, and will achieve those activities without involvement by the Portneuf Greenway.

The City is responsible for all project activities relating to the transportation improvements, and will collaborate with the Portneuf Greenway. The Portneuf Greenway will have design input and will provide feedback in a timely manner to be determined

## **SECTION. 3** **OBLIGATIONS**

The City is responsible for the overall management, performance, oversight, and reporting responsibilities under the grant, and for making subawards to Collaborating Entities.

The City will be responsible for the receipt of federal funds from EPA and the proper expenditure of these funds and will bear liability for unallowable costs.

The City is responsible for compliance and legal issues, and managing risks associated with the Projects.

The City may replace the Greenway as a Statutory Partner with another Statutory Partner, should the Greenway request replacement. A suitable replacement shall be chosen by a team consisting of employees from the City Public Works Department and the City Planning Department, along with a representative from the Portneuf Greenway, to ensure the replacement has the comparable expertise, experience, knowledge, and qualifications to ensure successful grant completion within 3 years. Replacement may be necessary for various reasons including performance issues. Any replacement requires prior approval by an authorized EPA official pursuant to 2 CFR 200.308(c)6).



The parties agree that, if the proposed application is selected for award, to enter a subaward that complies with the subaward requirements in the grant regulations at 2 CFR 200.331 and in EPA's Subaward Policy and related guidance and that contains terms and conditions including those above.

#### **SECTION. 4** **REMEDIES**

Default. No Party shall be deemed to be in default under this Agreement except upon the expiration of thirty (30) days after receipt of written notice from another Party specifying the particulars in which such Party has failed to perform its obligations under this Agreement ("Notice of Default"), unless such Party, prior to expiration of said thirty (30) day period, has rectified the particulars specified in the Notice of Default. If the cure is not one that is capable of being completed within such thirty (30) day period but is commenced within such thirty (30) day period and is being diligently prosecuted, then there shall be no default.

Default by the City of Pocatello. Apart from their respective contributions as specified in this Agreement, if the City of Pocatello or the Greenway default in the performance of their respective obligations under the terms and provisions of this Agreement, the Portneuf Greenway shall only be entitled to non-monetary remedies, such as specific performance, declaratory relief, and injunctive relief.

Attorneys' Fees. Should any Party find it necessary to employ an attorney for representation in any action seeking enforcement of any of the provisions of this Agreement, the unsuccessful Party (or Parties) in any final judgment or award entered therein shall reimburse the prevailing Party for all reasonable costs, charges and expenses, including reasonable attorneys' fees expended or incurred by the prevailing Party in connection therewith and in connection with any appeal, and the same may be included in such judgment or award.

#### **SECTION. 5** **OTHER PROVISIONS**

Notices. All notices, requests, consents, approvals, payments in collection with this Agreement, or communications that the Parties desire or are required or permitted to give or make to any other Party under this Agreement shall only be deemed to have been given, made and delivered, when made or given in writing and personally served, or deposited in the United States mail, certified or registered mail, postage prepaid, or sent by reputable overnight courier (e.g., FedEx) and addressed to the Party's designated representative identified below:

PORTNEUF GREENWAY FOUNDATION  
Daniel Harelson  
President, Board of Directors  
[portneufgreenwayfoundation@gmail.com](mailto:portneufgreenwayfoundation@gmail.com)  
208-238-2146  
PO Box 71, Pocatello, ID 83204

CITY OF POCATELLO

Jeffrey L. Mansfield, PE  
Public Works Director/City Engineer  
[jmansfield@pocatello.us](mailto:jmansfield@pocatello.us)  
208-234-6212  
911 N. 7th Avenue Pocatello, ID 83201

Notice shall be deemed given upon actual receipt (or attempted delivery if delivery is refused), if personally delivered or rejected. Any Party may designate a new or substitute representative by so notifying the other Parties as specified in this Section.

Force Majeure. Any prevention, delay or stoppage due to strikes, lockouts, labor disputes, acts of God, inability to obtain labor or materials or reasonable substitutes therefore, civil commotion, fire or other casualty, and other causes beyond the reasonable control of the Party obligated to perform, shall excuse the performance by such Party for a period equal to any such prevention, delay or stoppage.

Choice of Law. This Agreement shall be governed by, and construed in accordance with, the laws of the State of Idaho.

Jurisdiction. The state courts of the State of Idaho shall have exclusive jurisdiction of any suit, dispute, claim, demand, controversy, or cause of action that the Parties may now have or at any time in the future claim to have based in whole or in part or arising from the negotiations, execution, interpretation, or enforcement of this Agreement. The Parties submit to the in-person jurisdiction of the State, to venue in the state courts within the State, and consent to service of process being effected upon them by certified mail sent to the addresses set forth in this Agreement.

Entire Agreement. This Agreement constitutes the full and entire understanding and agreement between the Parties with regard to the transaction contemplated herein, and no Party shall be liable or bound to any other in any manner by any representations, warranties, covenants and agreements, whether written or oral, except as specifically set forth herein.

Acknowledgments and Modifications. No acknowledgments required hereunder, and no modification or waiver of any provision of this Agreement or consent to departure therefrom, shall be effective unless in writing and signed by each Party hereto. In the event

that all or any part of this Agreement is judicially found or declared to be unenforceable or contrary to applicable law, the Parties agree to modify the terms hereof to the slightest extent possible to cause the Agreement to be enforceable and consistent with applicable law.

Headings. The headings used in this Agreement are used for convenience only and are not to be considered in construing or interpreting this Agreement.

Successors and Assigns: Survival. This Agreement may be assigned only upon written consent of the City of Pocatello and Bannock County, with such consent not being unreasonably withheld. All provisions of this Agreement shall be binding upon and inure to the benefit of the Parties hereto and their heirs, successors and assigns and shall survive any transfer or assignment by a Party or their heirs, successors or assigns. This Agreement shall remain effective notwithstanding the expiration, cancellation, termination or completion of this Agreement as may be necessary for any Party to enforce the terms and provisions of this Agreement.

Counterparts. This Agreement may be executed in two or more counterparts, any of which shall be deemed an original but both of which together shall constitute one and the same instrument.

No Third-Party Beneficiary Rights. This Agreement is not intended to create, nor shall it in any way be interpreted or construed to create, any third-party beneficiary rights in any person not a party hereto.

Time is of the Essence. Time is of the essence for this Agreement.

Sufficient Appropriation. It is understood and agreed that the City of Pocatello is a governmental entity. Accordingly, this Agreement shall in no way be construed so as to bind or obligate the either entity beyond the term of any particular appropriation of funds.

Effective Date. This Agreement shall become effective on the first date mentioned above and shall remain in effect until amended or replaced upon the mutual consent of all Parties.

IN WITNESS WHEREOF, the parties have executed this Agreement, effective as of the Effective Date.

CITY OF POCATELLO, a municipal corporation of Idaho

---

BRIAN C. BLAD, Mayor



ATTEST:

\_\_\_\_\_  
KONNI R. KENDELL, City Clerk

PORTNEUF GREENWAY FOUNDATION, a 501(C)3 Organization

\_\_\_\_\_  
DANIEL HARELSON, President

Attachment C - Letters of Support

**BANNOCK COUNTY COMMISSIONERS**

624 E. Center St., Pocatello, ID 83201  
Phone: (208) 236-7210 • Fax: (208) 232-7363



**ERNIE MOSER**  
Commissioner  
1st District

**JEFF HOUGH**  
Commissioner  
2nd District

**JOHN CROWDER**  
Commissioner  
3rd District

The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

April 4, 2024

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept the Bannock County's support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. We have known the City of Pocatello to be excellent stewards of federal dollars and seeing through critical infrastructure and community projects. The City's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the County and region as a whole.

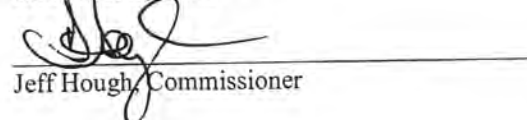
The vital water pollution improvements through proper sewer connections and accompanying multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Portneuf River Greenway bike path make this a highly desirable project for improving Bannock County. This project supports many of our joint goals to improve transportation and mobility in the region while also substantially reducing greenhouse gas emissions and other climate factors.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will not only incentivize alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities.

The Community Change project aligns with many of the area's goals and objectives. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

BANNOCK COUNTY COMMISSIONERS

  
Ernie Moser, Chair

  
Jeff Hough, Commissioner

\_\_\_\_\_  
John Crowder, Commissioner





214 East Center Street  
Suite 70  
P.O. Box 6129  
Pocatello, Idaho 83205

**POLICY BOARD  
REPRESENTATIVES**

**BANNOCK COUNTY**  
Commissioner  
Jeff Hough

**CITY OF CHUBBUCK**  
Mayor  
Kevin England

Council Member  
Roger Hernandez,  
Vice-Chair

**CITY OF POCATELLO**  
Mayor  
Brian Blad

Council Members  
Linda Leeuwrik, Chair  
Rick Cheatum

**POCATELLO  
REGIONAL TRANSIT**  
Director  
Skyler Beebe

**IDAHO  
TRANSPORTATION  
DEPARTMENT**  
District Engineer  
Todd Hubbard

Ex-Officio  
Non-Voting Members:  
Shoshone-Bannock Tribes  
School District #25  
Idaho State University

**PLANNING DIRECTOR**  
Mori R. Byington

p 208-233-9322

www.bannockplanning.org

March 13, 2024

The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept the Bannock Transportation Planning Organization's (BTPO) support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. The City of Pocatello's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the region as a whole. The vital water pollution improvements through proper sewer connections and accompanying multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Portneuf River Greenway bike path make this a highly desirable project for improving Bannock County. This project supports many of BTPOs goals to improve transportation and mobility in the region while also substantially reducing greenhouse gas emissions and other climate factors.

The Bannock Planning Organization (BTPO) is a non-profit association created by local governments for the purpose of conducting long-range transportation planning. The purposes for which BTPO exists are to conduct and/or coordinate various planning services, activities, and functions of, and for, the parties. These may include: transportation planning; Transportation Improvement Program (project selection); air quality planning; population and employment projections; and such other purposes and authorities consistent with the conduct of planning services for members or in the pursuit and/or performance of cooperative agreements for regional planning as hereinafter provided.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will not only incentivize alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities.

The Community Change project aligns with any of BTPOs goals and objectives. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,

Mori Byington  
Planning Director





The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept the Idaho State University's (ISU) support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. We have known the City of Pocatello to be excellent stewards of federal dollars and seeing through critical infrastructure and community projects. The City's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the County and region as a whole.

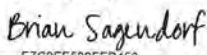
The vital water pollution improvements through proper sewer connections and accompanying multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Portneuf River Greenway bike path make this a highly desirable project for improving Bannock County.

Idaho State University serves Pocatello in its mission to engage our students through learning and research opportunities that improve our communities' intellectual vigor, cultural vitality, and health. By supporting this grant request, we are promoting our mission and those we wish to serve by increasing their access to opportunities and resources in the community.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will not only incentivize alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities, all of which bring vast benefit to the Bengal Community.

The Community Change project aligns with the values, goals, and objectives of Idaho State University. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,

DocuSigned by:  
  
E7C9EF68BFFED450  
Name: Brian Sagendorf  
Title: Vice President, Operations  
Date: 3/27/2024

Office of Campus Operations  
921 S. 8<sup>th</sup> Ave., Stop 8219 | Pocatello, Idaho 83209-8219  
(208) 282-2953 | [ternpati@isu.edu](mailto:ternpati@isu.edu)





Portneuf Health Trust, Inc.  
500 South 11<sup>th</sup> Ave. Suite 503  
Pocatello, ID 83201  
Phone: (208) 239-1953  
[www.portneufhealthtrust.org](http://www.portneufhealthtrust.org)

---

The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept the Portneuf Health Trust's support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. The City of Pocatello's grant application will create infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the region as a whole. The water pollution improvements through proper sewer connections and accompanying park and multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Greenway bike path make this a highly desirable project for improving Bannock County. This project supports Portneuf Health Trust's mission is to Enhance and improve the health of Southeastern Idaho and surrounding areas.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options, and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities.

The Community Change project aligns with many of the Health Trust's goals and objectives. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,

A handwritten signature in blue ink that reads "Shaun Menchaca". The signature is fluid and cursive, with the first name being the most prominent.

Shaun Menchaca  
President/CEO  
Portneuf Health Trust  
500 S. 11<sup>th</sup> Ave, Suite 503





Your Safety • Your Mobility  
Your Economic Opportunity

IDAHO TRANSPORTATION DEPARTMENT

5151 South 5th Ave. • Pocatello, ID 83204-2202

(208) 239-3300 • itd.idaho.gov

April 5, 2024

The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept the Idaho Transportation Department District 5's support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. We have known the City of Pocatello to be excellent stewards of federal dollars, seeing through critical infrastructure and community projects. The City's grant application will make vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the County and region as a whole.

The vital water pollution improvements through proper sewer connections and accompanying multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Portneuf River Greenway bike path make this a highly desirable project for improving Bannock County. This project supports many of our joint goals to improve transportation and mobility in the region while also substantially reducing greenhouse gas emissions and other climate factors.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options, and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will not only provide alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities.

The Community Change project will substantially improve transportation needs in our area. We support consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,

Eric Staats, PE  
Engineer Manager  
ITD District 5



WATER OPERATIONS FACILITY  
1889 N. Arthur Avenue  
P.O. Box 4169  
Pocatello, ID 83205-4169

SUPERINTENDENT'S OFFICE  
(208) 234-6174  
FAX (208) 234-7084

REPAIR SHOP  
(208) 234-6182



March 28, 2024

The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

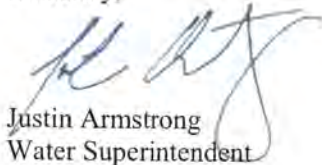
Please accept the City of Pocatello Water Department's support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. The City's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the County and region as a whole.

The Water Department's mission is to provide an uninterrupted supply of safe, clean drinking water to all customers. The Water Department serves approximately 17,645 customers within the city limits and in portions of Bannock County. Both the vital water pollution improvements through proper sewer connections and accompanying multi-modal transportation improvements along the City's S. 5<sup>th</sup> Corridor and Portneuf River Greenway bike path, make this a highly desirable project for improving Bannock County. This project supports many of our joint goals to improve water quality, transportation, and mobility in the region while also substantially reducing greenhouse gas emissions and other climate factors.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environmental impacts, improve a highly trafficked corridor, provide alternative transportation options, and add needed safety improvements to improve access to parks and recreation opportunities for disadvantaged communities. These improvements will not only incentivize alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities.

The Community Change project aligns with many of our goals of making sure our water is clean and safe to drink. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,



Justin Armstrong  
Water Superintendent

AN EQUAL OPPORTUNITY EMPLOYER/VETERAN'S PREFERENCE





The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept the Idaho Department of Environmental Quality's (IDEQ) support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. The City of Pocatello's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the region as a whole. The vital water pollution improvements through proper sewer connections and accompanying park and multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Greenway bike path make this a highly desirable project for improving Bannock County. This project supports DEQ's goals to reduce nitrate contamination of the Portneuf Valley Aquifer and improve water quality in the Portneuf River.

IDEQ has participated in many projects to make improvements to the water quality in the Portneuf River and in the Lower Portneuf Valley Aquifer. DEQ has a lead role in implementing the Portneuf River TMDL plan including administering grant funds to be used on water quality improvement projects along the river and its tributaries. DEQ also has an advisory role in commenting on Idaho Department of Water Resources-issued Stream Alteration Permits and has Clean Water Act Section 401 Certification authority for federally-approved actions (NPDES, 404 and FERC permits) potentially affecting water quality.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will not only incentivize alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities.

The Community Change project aligns with many of DEQ's goals and objectives. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Cornell".

Jennifer Cornell  
Surface Water Quality Manager  
DEQ Pocatello Regional Office  
[jennifer.cornell@deg.idaho.gov](mailto:jennifer.cornell@deg.idaho.gov)





*Our Mission: To protect, connect, and enhance wildlife habitat, working lands, and community spaces in Southeast Idaho, now and for future generations.*

The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept the Sagebrush Steppe Land Trust's (Land Trust) support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. The City of Pocatello's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the region as a whole. The vital water pollution improvements through proper sewer connections and accompanying park and multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Greenway bike path make this a highly desirable project for improving Bannock County. This project supports DEQ's goals to reduce nitrate contamination of the Portneuf Valley Aquifer and improve water quality in the Portneuf River.

The Land Trust's mission is to protect, connect, and enhance wildlife habitat, working lands, and community spaces in Southeast Idaho, now and for future generations. To accomplish this, the Land Trust works with willing landowners in Southeast Idaho to conserve private land by creating tailored agreements, known as conservation easements, to protect land while keeping it in private ownership. We are excited to work with the City on the proposed project, working to acquire easements for Greenway Trail.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will not only incentivize alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities.

The Community Change project aligns with many of the Land Trust's goals and objectives. As such, we value the City of Pocatello's leadership and commitment to our community. We urge your favor of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program which will provide sustainable environmental and health benefits to the community.

Sincerely,

Matt Lucia, Executive Director

**SAGEBRUSH STEPPE LAND TRUST**  
(208) 241.4662 -or- (208) 240.6045 • [www.sagebrushlandtrust.org](http://www.sagebrushlandtrust.org)  
109 N. Arthur Ave, Suite 300, Pocatello, Idaho • Mailing Address: PO Box 1404, Pocatello, Idaho 83204



The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept the Portneuf Resource Council's (PRC's) support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. The City of Pocatello's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the region as a whole. The vital water pollution improvements through proper sewer connections and accompanying park and multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Portneuf River Greenway bike path make this a highly desirable project for improving Bannock County. This project supports PRC's mission to improve water quality and support climate change solutions.

The Portneuf Resource Council (PRC) is a 501(c)(3) non-profit corporation committed to helping build sustainable, friendly communities that promote the health of people and stewardship of their environment. Our focus is in the Portneuf River Valley, the City of Pocatello and its surrounding communities. We are actively engaged in Clean Energy, Climate Solutions and Clean Water initiatives. This proposed project dovetails perfectly with those goals.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address environment impacts, improve a highly trafficked corridor to provide alternative transportation options and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will incentivize alternative transportation to improve traffic, travel, health outcomes, and improve quality of life for Pocatello's citizens.

The Community Change project aligns with PRC's clean water and sustainability mission and objectives. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Engle".

Mike Engle, Chair  
Portneuf Resource Council  
208 284 3825  
[mike.w.engle@gmail.com](mailto:mike.w.engle@gmail.com)  
[www.PortneufResourceCouncil.org](http://www.PortneufResourceCouncil.org)





Serving Southeast Idaho

NeighborWorks® Pocatello  
206 N. Arthur  
Pocatello, ID 83204  
(208) 232-9468  
(208) 232-9231 fax  
[www.NWPocatello.org](http://www.NWPocatello.org)

The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept NeighborWorks Pocatello's support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. The City of Pocatello's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the region as a whole. The vital water pollution improvements through proper sewer connections and accompanying park and multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Greenway bike path make this a highly desirable project for improving the region. This project takes place in two of NeighborWorks Pocatello's Neighborhood Associations and will provide vital infrastructure and quality of life improvements for those residents.

NeighborWorks Pocatello (NWP) is a progressive alliance between residents, business, and government that revitalizes targeted areas by empowering people, creating safe, healthy neighborhoods, providing opportunities for affordable stable housing, and building community pride. NWP is governed by a 15-member Board of Directors who represent different sectors of the Pocatello community, including residents of targeted neighborhoods, business leaders and government representatives.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will not only incentivize alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities.

The Community Change project aligns with many of NWP's goals and objectives. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,

A handwritten signature in blue ink, which appears to read "Mark Dahlquist". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mark Dahlquist, Executive Director  
NeighborWorks Pocatello





**Sheryl A. Brackett**  
Principal

**Cassie Atwood**  
Assistant Principal

**Mark Pixton**  
Assistant Principal/Athletic Director

**Benjamin Cody**  
Assistant Principal

The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept Century High School and Pocatello/Chubbuck School District 25's support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. The City of Pocatello's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the region as a whole. The vital water pollution improvements through proper sewer connections and accompanying multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Portneuf River Greenway bike path make this a highly desirable project for improving Bannock County. The improved infrastructure for pedestrians will significantly increase the safety of students attending Century High School.

Pocatello/Chubbuck School District 25 is the 5<sup>th</sup> largest school district in Idaho. Founded in 1887, the district is a community of children, parents, educators and patrons working collectively toward a common purpose to graduate learners with the skills to be successful contributors in a changing, diverse world. Pocatello/Chubbuck School District 25 believes that learning occurs best in a safe, respectful environment where all individuals are valued. This safe environment includes the facilities which our learners, staff, and faculty use to commute to schools within our community. Century High School has long needed improved pedestrian amenities near the school and appreciates the City's commitment to providing those amenities.

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**Century High School**

7801 W. Diamondback Dr.  
Pocatello, Idaho 83204

Phone: (208) 478-6863 Fax: (208) 478-6870

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will not only incentivize alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities.

The Community Change project demonstrates a mindframe that Pocatello/Chubbuck School District 25 encourages in their students: I am a change agent. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,

A handwritten signature in cursive script that reads "Sheryl Brockett". The signature is written in dark ink and is positioned above the printed name.

Sheryl Brockett, Principal





City of Pocatello  
P.O. Box 4169  
Pocatello, ID 83205-4169  
www.pocatello.us/wpc

Water Pollution Control Department  
Office: (208) 234-6254  
Fax: (208) 237-3927

Levi Adams  
Superintendent

March 26, 2024

The Honorable Michael S. Regan  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Letter of Support for the City of Pocatello's Environmental and Climate Justice Community Change Grants Program Application

Dear Administrator Regan,

Please accept the Water Pollution Control Facility's (WPC) support of the City of Pocatello's grant application for the U.S. Environmental Protection Agency (EPA)'s Environmental and Climate Justice Community Change Grants Program. The City of Pocatello's grant application will create vital infrastructure improvements that will address climate challenges and reduce pollution in a historically disadvantaged area of the city while also strengthening the region as a whole. The critical water pollution improvements through proper sewer connections and accompanying multi-modal transportation improvements particularly along the City's S. 5<sup>th</sup> Corridor and Portneuf River Greenway bike path make this a highly desirable project for improving Bannock County. This project supports a significant goal of the WPC to improve water quality in the region, through nitrate reductions, while also substantially reducing greenhouse gas emissions and other climate factors.

WPC is dedicated to protecting the health of the public and the environment by ensuring our advanced Class 4 collection and treatment systems meet and exceed the strict standards set forth by the Idaho Department of Environmental Quality (IDEQ) and the Environmental Protection Agency (EPA). The WPC treatment facility is one of the largest in Idaho. It has a design capacity of 12 million gallons per day and provides secondary treatment and nitrification. This is where the magic happens and renewable water becomes beneficial again.

In addition to transforming renewable water into clean water, WPC extracts nutrients, known as biosolids, for soil amendment and produces energy from the methane gas generated during the cleaning process.

Pocatello's Community Change grant application presents a unique opportunity for the City to fund a major infrastructure project that will address negative climate and environment impacts, improve a highly trafficked corridor to provide alternative transportation options and add needed safety improvements as well as provide improved access to parks and recreation opportunities for disadvantaged communities. These improvements will not only incentivize alternative transportation to improve traffic, travel, and health outcomes, but also improve quality of life through notable climate improvements and potential economic development opportunities.

The Community Change project will provide essential connections to the community and reduce the impact of septic tanks on the environment. As such we urge your positive consideration of the City of Pocatello's grant application for the Environmental and Climate Justice Community Change Grants Program.

Sincerely,

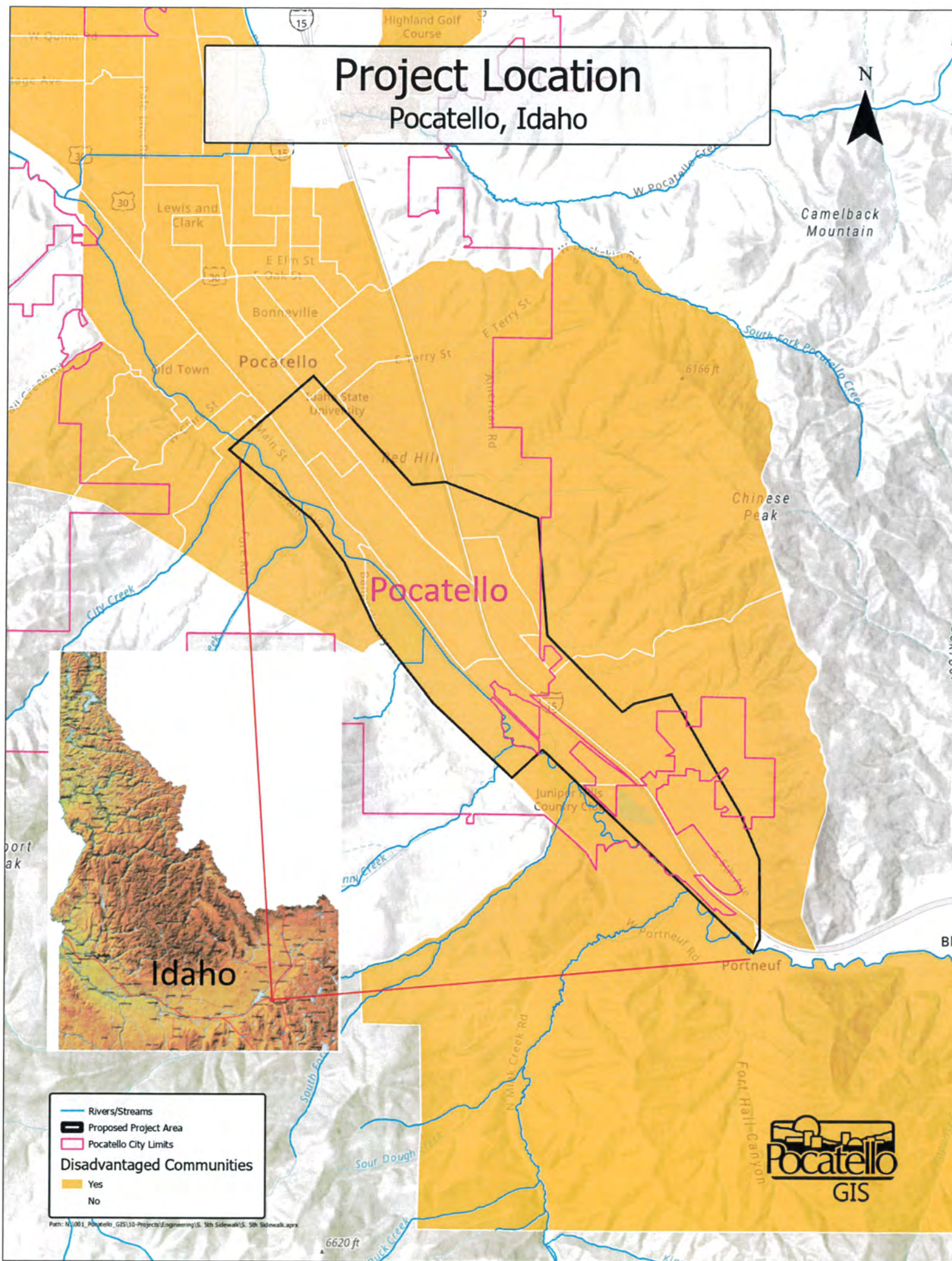
Levi Adams  
WPC Superintendent



## **Attachment D: Project Plans (maps and images)**

# Project Location

## Pocatello, Idaho



Rivers/Streams  
Proposed Project Area  
Pocatello City Limits

**Disadvantaged Communities**

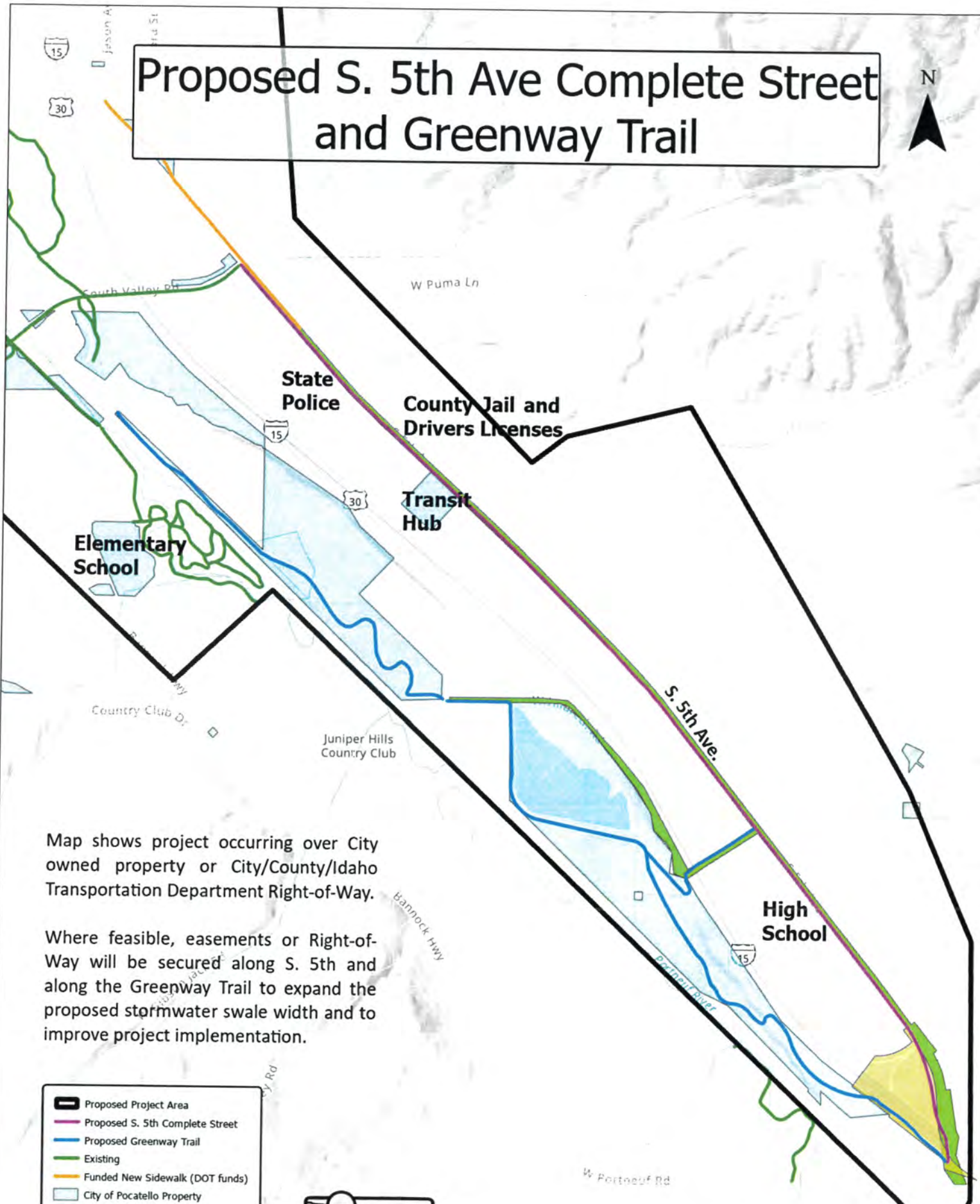
- Yes
- No



Path: N:\001\_Pocatello\_GIS\10-Projects\Engineering\5. 5th Sidewalk\5. 5th Sidewalk.aprx



# Proposed S. 5th Ave Complete Street and Greenway Trail



Map shows project occurring over City owned property or City/County/Idaho Transportation Department Right-of-Way.

Where feasible, easements or Right-of-Way will be secured along S. 5th and along the Greenway Trail to expand the proposed stormwater swale width and to improve project implementation.

- Proposed Project Area
- Proposed S. 5th Complete Street
- Proposed Greenway Trail
- Existing
- Funded New Sidewalk (DOT funds)
- City of Pocatello Property parcels\_public
- ITD Property
- City or County Right of Way



Esri, NASA, NGA, USGS, FEMA, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USEFWS, Portneuf

Path: N:\001\_Pocatello\_GIS\10-Projects\Engineering\S. 5th Sidewalk\S. 5th Sidewalk.aprx



# Proposed Complete Street for S. 5th Ave

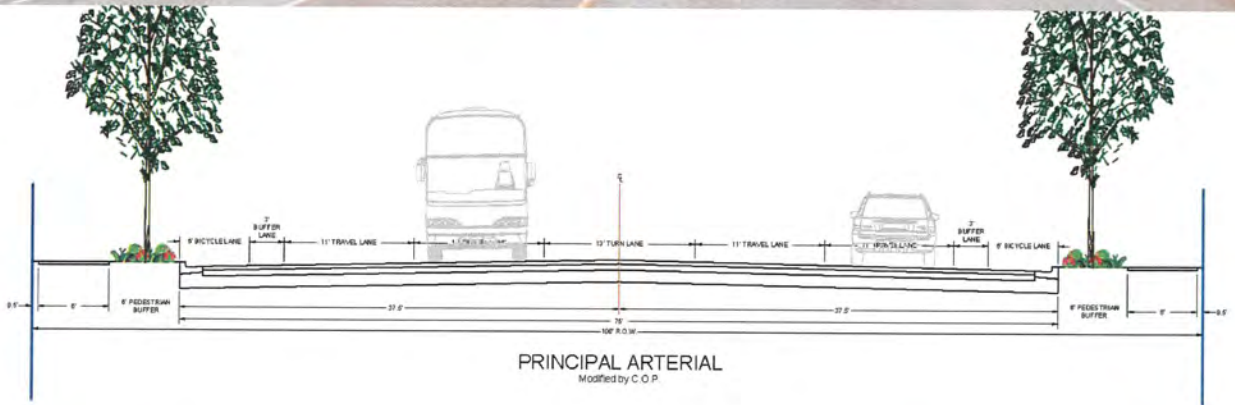
## Pocatello, Idaho

### 80' Right-of-Way



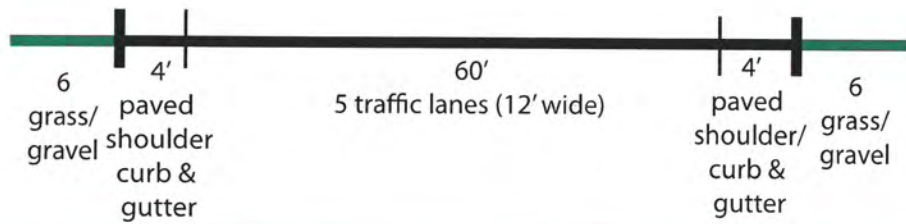
#### CITY STANDARDS

Principal Arterial Streets



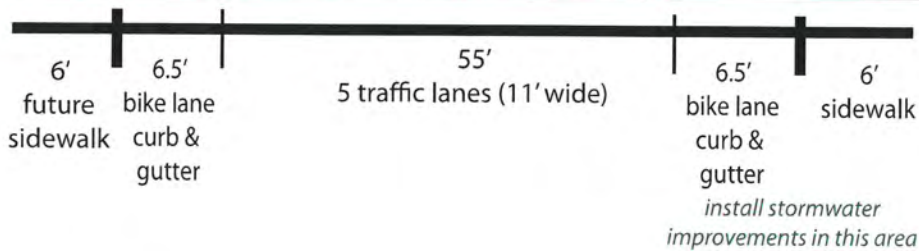
#### EXISTING

S. 5th  
45mph



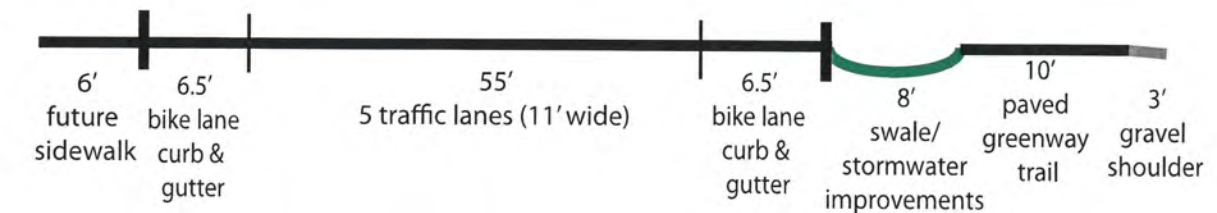
#### PROPOSED

S. 5th  
45 mph



#### PROPOSED

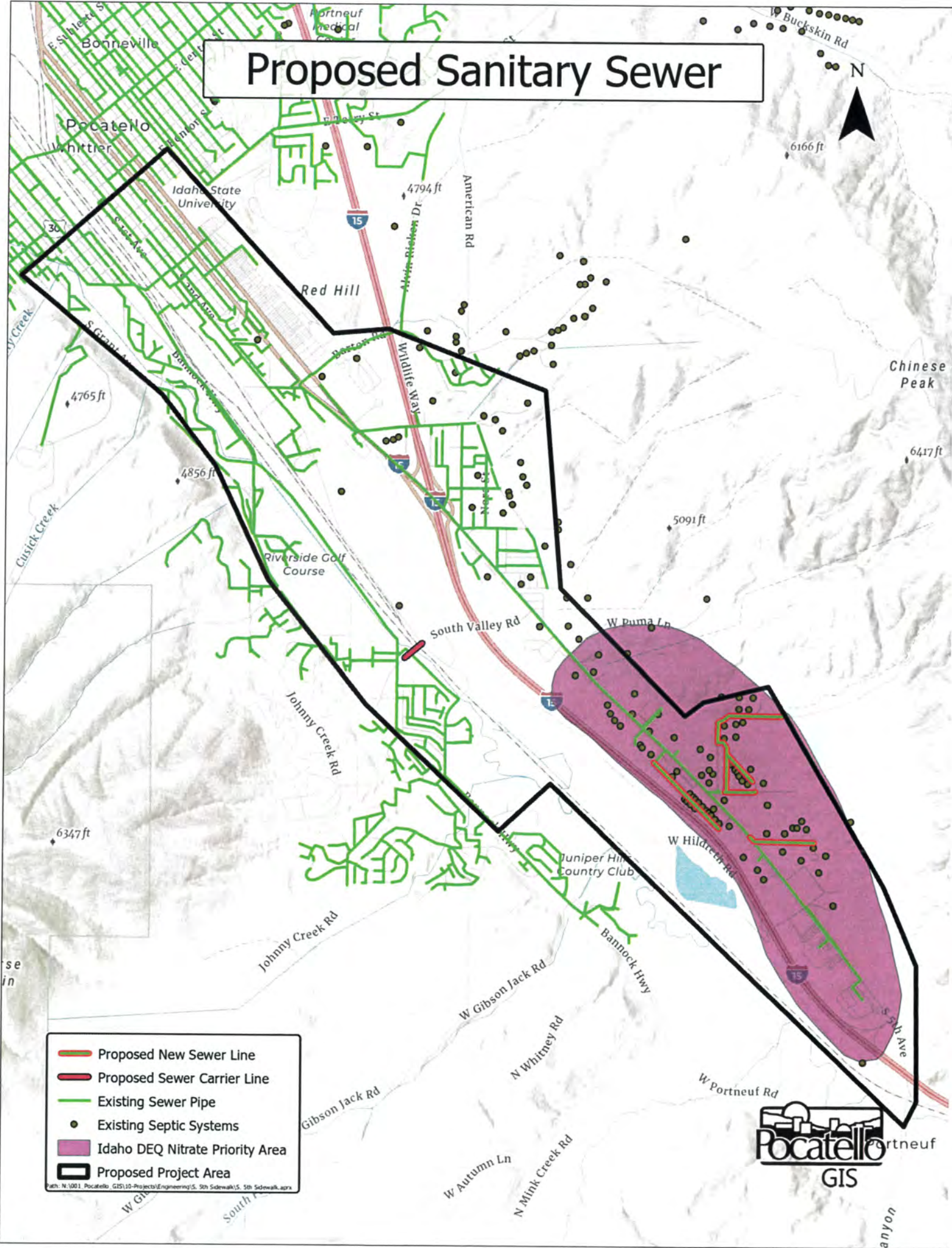
S. 5th with 15' ROW acquisition  
45 mph



*Design will be modified based on project surveying, engineering and input from the community.*



# Proposed Sanitary Sewer



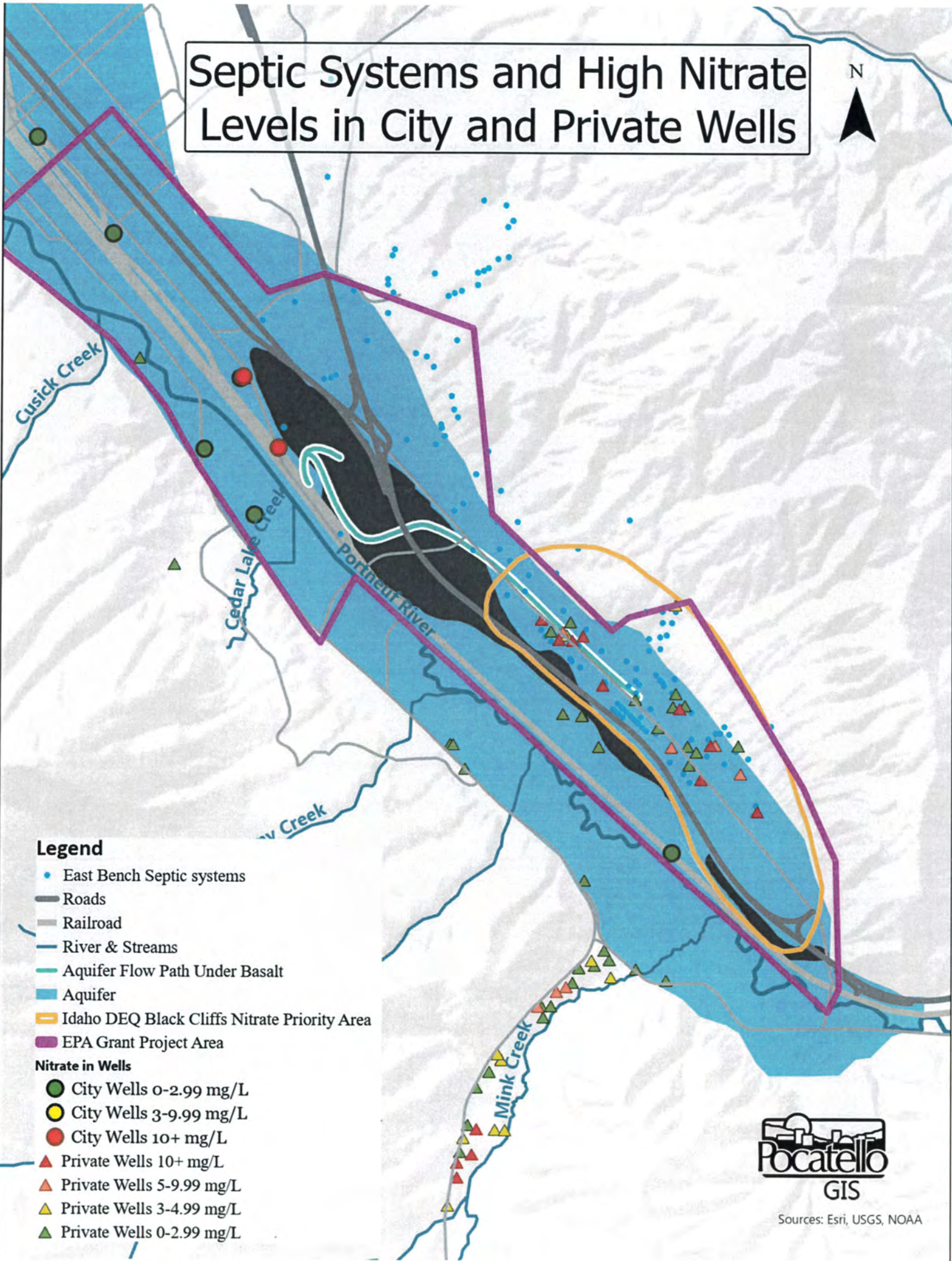
- Proposed New Sewer Line
- Proposed Sewer Carrier Line
- Existing Sewer Pipe
- Existing Septic Systems
- Idaho DEQ Nitrate Priority Area
- Proposed Project Area



Path: N:\001\_Pocatello\_GIS\10-Projects\Engineering\5. 9th Sidewalk\5. 5th Sidewalk.aprx



# Septic Systems and High Nitrate Levels in City and Private Wells



## Legend

- East Bench Septic systems
- Roads
- Railroad
- River & Streams
- Aquifer Flow Path Under Basalt
- Aquifer
- Idaho DEQ Black Cliffs Nitrate Priority Area
- EPA Grant Project Area

## Nitrate in Wells

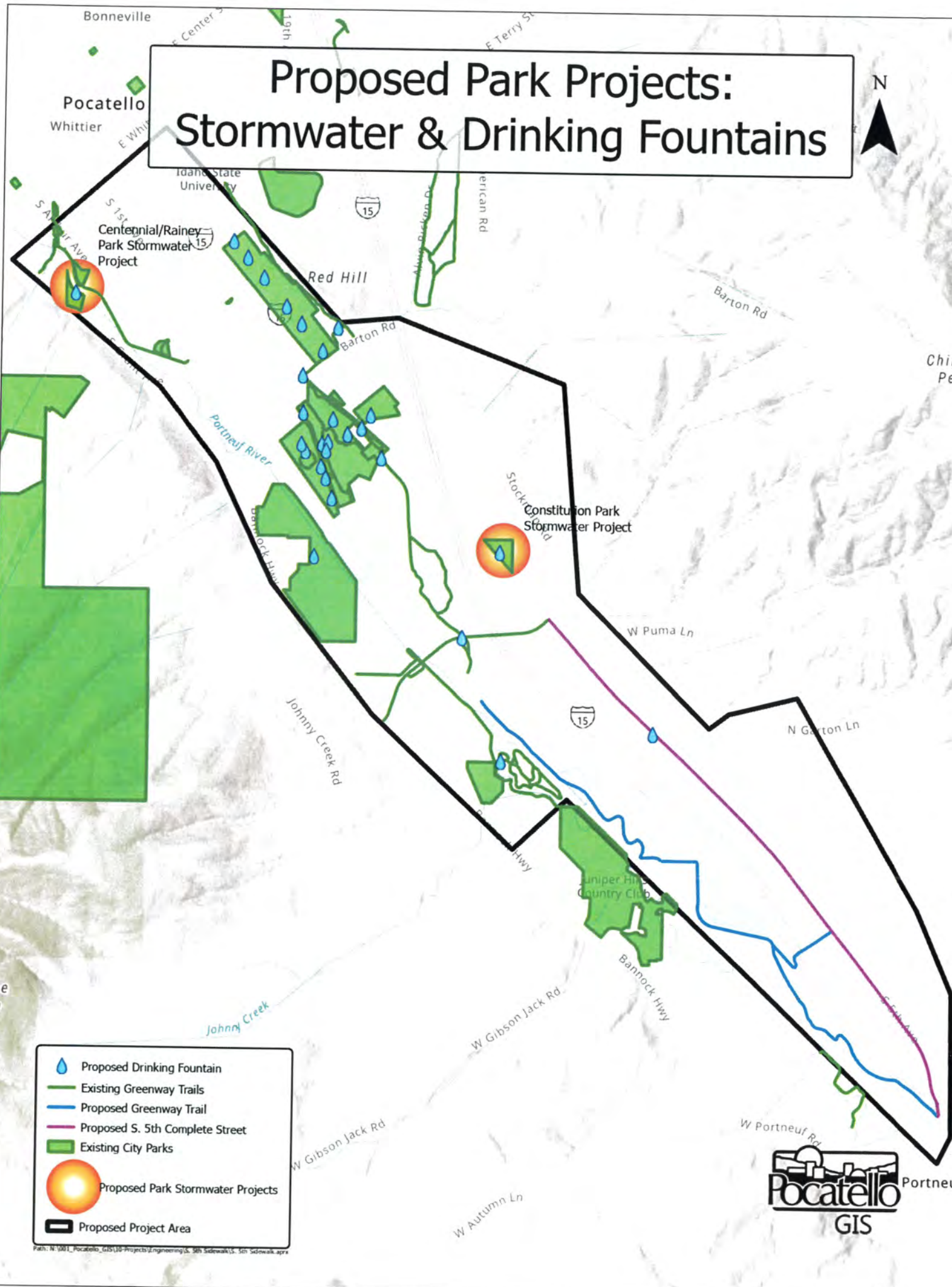
- City Wells 0-2.99 mg/L
- City Wells 3-9.99 mg/L
- City Wells 10+ mg/L
- ▲ Private Wells 10+ mg/L
- ▲ Private Wells 5-9.99 mg/L
- ▲ Private Wells 3-4.99 mg/L
- ▲ Private Wells 0-2.99 mg/L



Sources: Esri, USGS, NOAA



# Proposed Park Projects: Stormwater & Drinking Fountains



-  Proposed Drinking Fountain
-  Existing Greenway Trails
-  Proposed Greenway Trail
-  Proposed S. 5th Complete Street
-  Existing City Parks
-  Proposed Park Stormwater Projects
-  Proposed Project Area

Path: N:\041\_Pocatello\_GIS\10-Projects\Engineering\5\_Sth Sidewalk\5\_Sth Sidewalk.aprx





# Rainey/Centennial Park Project

60% design; showing components funded with other federal funds

BOR Funded Project Area

- LEGEND (EXISTING)**
- PROPERTY LINE FROM GIS
  - EXISTING TREE (DECIDUOUS)
  - EXISTING TREE (EVERGREEN)
  - ▨ EXISTING RPRAP

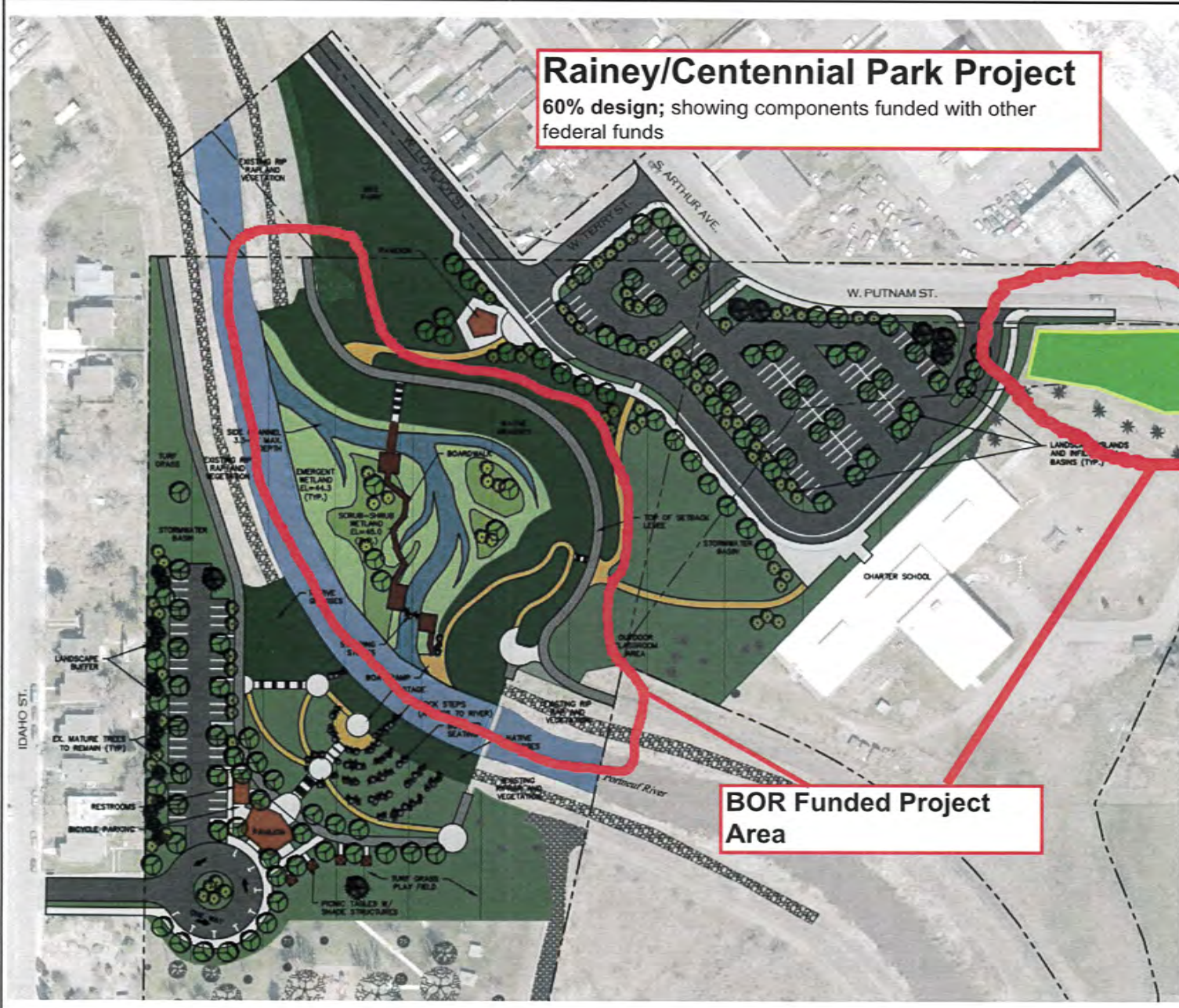
- LEGEND (PROPOSED)**
- ▨ ASPHALT PAVEMENT
  - ▨ CONCRETE PAVEMENT
  - ▨ GRAVEL PATHWAY
  - ▨ BOARDWALK
  - BOULDER
  - TREE (DECIDUOUS)
  - TREE (EVERGREEN)
  - TREE (SMALL ORNAMENTAL)
  - ▨ TURF GRASS
  - ▨ NATIVE GRASS
  - ▨ EMERGENT WETLAND
  - ▨ SCRUB-SHRUB WETLAND
  - ▨ RIVER



DATE: 11/21/2019	REVISIONS:

SCALE: AS SHOWN	DESIGNED BY: RJD
DRAWN BY: RJD	CHECKED BY: JFZ
PROJ.#: 1901102701	

**PROJECT NAME**  
CENTENNIAL-RAINEY LEVEE SETBACK  
AND ECOSYSTEM ENHANCEMENT  
CONCEPTUAL SITE PLAN





## Attachment E - Community Engagement and Collaborative Governance

## Community Engagement and Collaborative Governance Plan

### Past Community Outreach and Engagement Conducted *(4 points)*

*The applicant should demonstrate what outreach and engagement methods were used to engage with the Project Area community, including any with specific neighborhoods or groups, and how this impacted the selection of the strategies and associated projects as well as the applicant's implementation approach.*

The City and their collaborating entities have implemented the following outreach and engagement in recent years:

Portneuf River Vision Study <i>City of Pocatello &amp; US Army Corps of Engineers</i>	2014 – 2016, stakeholder engagement ongoing	Stakeholder interviews Presentations Public open houses and surveys Mailings Social Media
The City of Pocatello and the Portneuf River <i>Utah State University &amp; the City of Pocatello</i>	Spring 2019	Brainstorming Session Visioning Public Hearing Open Houses
Bicycle and Pedestrian Master Plan <i>Bannock Transportation Planning Organization (BTPO)</i>	2017 - 2019	Survey Comment map
Metropolitan Transportation Plan 2040 <i>BTPO</i>	October 2019	Stakeholder interviews Public meetings Public information flyers Comment map Polling
Bannock County Comprehensive Plan <i>Bannock County</i>	2017 – 2021 Currently under review.	Stakeholder interviews Advisory committee meetings Online comment map Public open house and survey Internal survey
Bannock County Hazard Mitigation Plan 2021 <i>Bannock County</i>	December 2021	Stakeholder interviews Advisory committee meetings Social Media Public open house and survey
Bannock County Transportation Plan <i>Bannock County</i>	February 2022	Survey Social Media
City of Pocatello Comprehensive Plan <i>City of Pocatello</i>	2020 - 2023	Focus group Public open houses and survey Online comment map Focus Groups
Metropolitan Transportation Plan 2050 <i>BTPO</i>	2023	Public meeting Workshop Comment solicitation



		Comment map
Bannock County Comprehensive Plan <i>Bannock County</i>	Ongoing	Stakeholder interviews Advisory committee meetings Online comment map Public open houses and survey Internal survey
Lead Safe and Healthy Homes Program <i>City of Pocatello</i>	Ongoing	Public meetings Direct mailers Outreach events and booths Trainings Focus Groups Social Media Press Releases Newsletters
Community Development Block Grant Property Rehabilitation Program <i>City of Pocatello</i>	Ongoing	Public meetings Outreach events and booths Focus Groups Social Media City website Newsletters
Brownfield Redevelopment Program <i>City of Pocatello</i>	Ongoing	Public meetings Outreach events and booths Public open houses and survey Focus Groups Social Media City website Newsletters

This outreach has demonstrated a consistent request for improvements to the community greenway and trails system. Additionally, clean water and pollution prevention are critical to the community and development in the targeted area requires the selected strategies and projects to reduce pollution and improve water quality for the entire valley. The recently completed BTPO Metropolitan Transportation Plan 2050 clearly demonstrated that bicycle and pedestrian improvements remain the most important criteria in prioritizing projects in the community. Additionally, lack of sidewalks or bicycle paths presented as two of the major transportation barriers. Providing a safe multimodal transportation network was a key goal of the updated transportation plan.

In August 2017, PRT and BTPO conducted five pop-up outreach sessions, one open house session, and three focus groups around the region to learn more about the current transit challenges and opportunities in the Pocatello and Chubbuck areas. Riders and non-riders were also surveyed online and in-person, providing the community with an opportunity to weigh in on how PRT should prioritize service given its limited funding.

The project will primarily respond to safety and equity concerns. Groundwater protection responds to the Community Vision elements identified in the City's plans, particularly the

Comprehensive Plan 2040, which was adopted in July of 2023 by the Pocatello City Council. Residents are seeking economic viability and climate resiliency. In particular, southern areas of the City were identified as a key area for these goals. With this, the City has been able to identify the septic to sewer conversions as a top priority for investment.

In addition, the City, through funding from the Department of Housing and Urban Development (HUD), conducts a property rehabilitation grant program for homeowners in the City of Pocatello along with a Lead Safe and Healthy Homes program. These programs strive to remove home health hazards for low- and moderate-income residents. Some hazards addressed include: lead-based paint, asbestos, mold, radon, and sewer line replacements. The programs conduct substantial outreach as part of the adopted Citizen Participation Plan. This outreach has identified housing needs as a top priority in these project areas. The City has completed numerous projects through the CDBG and LSHH programs in the project area and the proposed S. 5<sup>th</sup> Ave Complete Street and sewerage will complement and help implement this work, in particular through the sewer connection program that will result from the improvements.

Finally, the City's recent Comprehensive Plan update included heavy engagement with the Pocatello community including participation at 20 events, 8 open houses, and 864 surveys filled out. From this the City learned that the broader community wants the City to invest in its parks and recreation, as well as water quality. The proposed project will meet this need by providing drinking water fountains at City parks, where there current are none. The proposed project will also invest in expanding access and stormwater infrastructure at two City parks within disadvantaged neighborhoods.

#### Community Engagement Plan Implementation (6 points)

*The applicant should demonstrate the specific community engagement methods, as well as how they will mitigate barriers and involve relevant governmental stakeholders necessary to support overall implementation.*

The community has expressed that their needs go beyond improving traffic flow along this roadway and beyond just non-motorized trails. The City's Community Engagement Plan will strive to not only implement climate action activities that make the City more resilient in the near term but also address long-term, sustainable practices that will improve public health as a whole. The proposed project derives many strategies that address social determinants of health (SDOH), in particular those related to housing (improved sewer and water quality) and transportation (access to alternative transportation modes). Robust community engagement will be incorporated throughout the project, from design to implementation. The City strives to achieve overall health and quality of life improvements for the residents in the project area, which is a defined disadvantaged community.

When preliminary design begins, the project will facilitate an outreach program in 2024-2025 to engage neighborhoods and businesses along the corridor. The preliminary designs do not relocate businesses while implementing the needs identified. Without the Community Change grant, the project lacks funding to meet the wastewater treatment, bicycle, pedestrian, and infrastructure safety needs that go beyond the state of good repair. Pocatello will need to balance



funding constraints, funding opportunities, stakeholder expectations, project benefits, and costs before finalizing the project design for construction.

Outreach will begin with community-wide notifications of the goals and vision of the projects including a website, social media posts, inclusion in the monthly newsletter from the mayor, open houses in the project area, and signage posted in the area with QR codes and contact information. This information will be made available on ADA-accessible sites as well as available in any languages identified in the project area based on the number of limited English proficient speakers. Open Houses will be set up in project neighborhoods to facilitate community involvement. Once feedback has been received from the public regarding the goals and vision of the projects, the details of the project will be refined to incorporate feedback from the community. Outreach materials will be made available in English and Spanish. Members of the strategic oversight committee will be encouraged to distribute engagement materials to their areas of influence.

Special effort will be made to engage with members of disadvantaged populations, including: 1) Directly hanging flyers on doors, which has been highly successful in Pocatello during previous outreach efforts; 2) Hosting project Open Houses in neighborhoods, where people live; and 3) translating outreach material into Spanish. Open houses will attempt to be paired with other community events to meet residents and stakeholders where they are at and at times of day that accommodate many schedules (i.e.- evening hours or weekend days).

There are distinct components of this project (street improvements and trails; drinking fountains; park improvements; sanitary sewer). Each of these projects will have separate outreach campaigns that will overlap with one another and will be guided by the strategic oversight committee. It is expected that this effort will result in a greater needs list than can be completed by this project. These additional items will be added to the City's Capital Improvements Plan for funding at a future time.

A significant focus of the initial outreach will be on the acquisition of right-of-way or easements to locate portions of the S. 5<sup>th</sup> Ave Complete Street and Greenway Trail in their preferred location. The S. 5<sup>th</sup> Ave Complete Street would benefit from an additional 10-15' of right-of-way, where feasible. If that is not achieved, the project design will be modified to ensure that the project is constructed within the right-of-way. There is sufficient capacity on City property and on Bannock County/Idaho Transportation Department right-of-way to construct the entire proposed project.

Outreach will continue through final project designs and construction. Members of the Strategic Oversight Committee will attend community events such as the local farmer's market and weekly bike ride sponsored by the community to be available for candid feedback. A special event at a park central to the public will be scheduled in order to reach local residents specifically impacted by the project. Outreach events will also be held at K-12 schools adjacent to the project. The project website will be updated monthly, with all feedback available to the public for review. As the project progresses, the City will continue to engage with community stakeholders. This will include notification and project updates using the City's social media and

web accounts in order to alert travelers and residents about construction timeframes and anticipate closures during construction.

Finally, key stakeholders will be involved in the final design and engineering phase as well as construction phases to ensure the proper sectors are consulted:

- The City's Science & Environment Division will be consulted during design and through construction to ensure the solutions align with climate goals and environmental concerns. The Science & Environment Division will reach out to Watershed Partners (including Idaho Department of Fish and Game, US Fish and Wildlife Service, Natural Resource Conservation Service, Idaho Association of Soil Conservation, Bureau of Land Management, US Forest Service, Shoshone-Bannock Tribes, and the Idaho Department of Environmental Quality) throughout the project for review of project components such as the stormwater measures being enacted or the location of the Greenway Trail along the base of the lava cliffs.
- The Bannock County Office of Emergency Management will be apprised of project schedules and timelines to ensure there are minimal to no interruptions and viable alternative routes for emergency vehicles during construction.
- Pocatello Regional Transit will be consulted to ensure alternative routes are established during construction to minimize interruption to service and proper notification is provided to riders.
- The Pocatello-Chubbuck School District #25 will be consulted to ensure alternative routes are established during construction to minimize interruption to service and proper notification is provided to parents and riders.

#### Collaborative Governance Structure *(5 points)*

*Collaborative Governance Structure: The applicant should provide details regarding the roles and responsibilities of the Lead Applicant, Collaborating Entities, and community residents and/or community-selected representatives for implementing, managing, and overseeing the application's project activities, including how they should meet regularly to discuss project implementation.*

#### Strategic Oversight Committee Implementation:

As the applicant, the City of Pocatello will form a Strategic Oversight Committee to engage with the community and provide collaborative governance. This oversight committee will include: members of the Portneuf Greenway Foundation; key government officials such as Southeastern Idaho Public Health and Department of Environmental Quality representatives; representatives from the City of Pocatello, Bannock Transportation Planning Organization, Bannock County, and the Idaho Transportation Department; key community members such as bicycle advocates, persons with mobility impairments, and residents of the impacted community; representatives from nonprofits such as NeighborWorks Pocatello and the Portneuf Health Trust; School District representatives; and Shoshone-Bannock Tribe representatives. Community member representatives are going to be a key part of the committee, guiding it forward and helping build stronger lines of communication between the City and residents.



Outreach to solicit members of this committee will occur through direct contact (phone calls/emails) and soliciting applicants from the public via social media, the mayor's monthly newsletter, a public news release, postings at community buildings, and other widespread outreach methods. The goal is to reach a broad cross-section of community representation that also addresses the disadvantaged community needs.

#### Planned Decision Making Processes

*Provide an outline of the planned decision-making processes between the Lead Applicant and Collaborating Entities, including procedures to ensure that decisions are transparent and can be made in an expedited manner when necessary.*

Ground rules and duties of the Strategic Oversight Committee will be established at the first meeting, including expectations, governance, and tasks. The committee will coordinate through bi-monthly meetings and will inform and engage the community through techniques as outlined in the Promising Practices for Meaningful Public Involvement in Transportation Decision-Making, published by the Department of Transportation<sup>1</sup>, and the adopted CDBG Citizen Participation Plan and Policies and Procedures. Methods will be determined by the committee in order to most effectively meet the needs of the community and the specific project requirements.

The Strategic Oversight Committee will provide recommendations to the City of Pocatello on project objectives. The City will review these recommendations to ensure that decisions are transparent, comply with grant terms and conditions or requirements, and can be implemented. This information will be presented back to the strategic committee.

#### Proposed Collaborating Entities:

- The **Portneuf Greenway Foundation** is the Community Based Organization (CBO) for the proposed project. The City of Pocatello has a long history of working with the Greenway Foundation to develop, plan, fund, and implement projects. The two organizations share implementation and maintenance of Greenway trails. This proven relationship will allow for efficient implementation of the S. 5<sup>th</sup> Ave. Complete Street path and the Greenway Trail proposed as part of this project.
  - The Portneuf Greenway Foundation's mission is to create a network of paved bicycle and pedestrian trails throughout the greater Pocatello-Chubbuck area to enhance the quality of life for residents and visitors by establishing and improving the Portneuf Greenway as a community resource.
  - The foundation is a 501(c)3 organization established in 1992 and is governed by a volunteer board of directors.
- **Neighborworks® Pocatello** will be a Collaborating Entity for the proposed project. NWP is a grassroots organization, focused on elevating the voices of the community through robust collaborative community engagement. NWP has a long history of outreach with the disadvantaged neighborhoods throughout the City of Pocatello, as it serves as the oversight entity for the City's local Neighborhood Associations, including

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<sup>1</sup> [https://www.transportation.gov/sites/dot.gov/files/2023-11/Promising%20Practices%20for%20Meaningful%20Public%20Involvement\\_2023Update\\_FINAL.pdf](https://www.transportation.gov/sites/dot.gov/files/2023-11/Promising%20Practices%20for%20Meaningful%20Public%20Involvement_2023Update_FINAL.pdf)

the Mountainview Neighborhood Association and Old Town Neighborhood Association. NWP will help ensure that the proposed sidewalks, drinking fountains, and park improvements align with neighborhood interests and needs.

- NeighborWorks® Pocatello is a progressive alliance between residents, business, and government that revitalizes targeted areas by empowering people, creating safe, healthy neighborhoods, providing opportunities for affordable stable housing, and building community pride.
- NeighborWorks® Pocatello is a chartered member of the NeighborWorks® network—trained and certified community development organizations at work in more than 2,000 communities across the United States.
- NeighborWorks® Pocatello was created by the community in 1993 to revitalize the central neighborhoods of Pocatello. NeighborWorks® Pocatello works towards this goal in several ways including hiring community outreach professionals to work with residents, providing support, and teaching skills residents can use to improve their neighborhoods.

A Collaborating Entity may only be replaced through approval by the Strategic Oversight Committee to ensure that the replacement entity has comparable skills, qualifications, expertise, community support, and experience to avoid any adverse impact on grant performance. EPA approval of the qualifications, expertise, and experience of the replacement Collaborating Entity will be required pursuant to 2 CFR 200.308I(2) and / I(c)(6).



Attachment F - Community Strength Plan

## Community Strength Plan

*Applicants must submit a Community Strength Plan that describes how their proposed projects will enhance the overall strength and economic prosperity of the community, including maximizing the benefits of the projects for existing residents and minimizing potential risks associated with investing significant resources into the Project Area. This should include strategies for how the projects will promote inclusive economic development, drive benefits of the projects to existing residents, and proactively address unintended displacement consequences. This plan should speak to how the projects will enhance the overall wellbeing of the community, ensuring existing community members receive the benefits of these investments and can build on those benefits for future generations.*

### 1. Maximizing Economic Benefits of Projects:

The City of Pocatello Community Change Grant will create several opportunities for the community in addition to reducing greenhouse gas emissions. The project proposal envisions several long-term benefits that will strengthen the economic prosperity of the community and provide residents with improved health outcomes, quality of life, and employment opportunities.

#### Business Opportunities:

Sewer line development has been linked to business and economic development due to the ability to handle larger capacity. This will encourage redevelopment for the area and development of under or unutilized sites. This brings in industry, commercial or otherwise, and creates jobs as well as increased tax revenues. The S. 5<sup>th</sup> Ave. corridor has many vacant or underutilized sites that could be redeveloped and bring in a number of commercial entities. Additionally, the City's Future Land Use map proposes re-zoning several sections of S. 5<sup>th</sup> Ave. from commercial to industrial which may also have greater land value due to increased available property uses. The sewer capacity will aid in these development opportunities.

The project itself will also provide opportunities for businesses to engage the City for work as well. With over \$16M in proposed project costs, the City will have multiple construction contracts for the project phases. In particular, the City commits to have a trained workforce install, maintain, and operate the equipment, with all required licensing and certifications. The City promotes all DBEs and utilizes the State of Idaho Associated General Contractors certified list of DBEs. The City commits to including a DBE goal in the bid package for the design and construction of the project. The City complies with Idaho Code 67-2805, the Procurement of Public Works Construction and commits to fair and transparent bidding practices. The City is an Equal Opportunity Employer. The City is also home to the IBEW Local 449 Electrical Union and commits to notifying the union of the bidding package at the time of publication. Further, the City and Idaho State University enjoy healthy relationships, including the coordination of job fairs and internship opportunities, in particular through its Continuing Education and Workforce Training Program.



### Job Opportunities:

Short term economic benefits from the project will be realized through the construction phases, as construction of a multi-million-dollar project will allow for job creation. The proposed project will require hiring several construction firms. The jobs for construction activities funded under this grant will be required to pay prevailing wage rates, as required by CAA § 314 and the Davis-Bacon and Related Acts.

As noted above, the multiple millions invested in these projects will yield job opportunities. This includes both the on the ground labor workforce and also the economies of scale which include materials suppliers, manufacturers, transportation of supplies and materials, and other related industries. According to the most recent estimates of infrastructure investment on employment, as generated by the Council of Economic Advisers (CEA), \$1B in highway and transit investment would support 13,000 jobs for a year, including direct jobs, indirect jobs, and induced jobs<sup>1</sup>. Direct and indirect jobs accounted for 64% or 8,320 of the jobs in this example. When taken to scale with the proposed S. 5<sup>th</sup> Ave project, this would equate to about 133 direct and indirect jobs and 208 jobs total. This is a substantial increase in job opportunities for the region's economy.

### Financial Savings:

It is expected that the implemented Complete Street and Greenway Trail will reduce the need for vehicle transportation, resulting in cost-savings. With Century High School at one end of the project area, this will result in a significant reduction of vehicle miles travelled for the parents who currently drop their child off at school and could instead encourage them to ride their bike. Currently, bike travel and walking along this corridor is not safe as there are no sidewalks or even bike lanes.

Additionally, the many homes on septic systems will see savings from converting to City sewer from the proposed project. While the cost they currently pay for pumping out their septic tank will be replaced with a monthly sewer bill, they will no longer need to replace their septic tank when it stops working. This will save funds and reduce the need to dig up additional ground for drain fields.

This septic to sewer conversion will also improve water quality in nearby private wells and City wells eliminating the need for drilling new wells or treating health issues caused by drinking water high in nitrates.

By installing working drinking fountains in City parks, residents will save money by not buying bottled water. Installing a culture of drinking City water is a project goal. The drinking water quality is great and meets all EPA and Idaho DEQ guidelines and criteria.

Improvements to two City parks will also decrease the need for area residents to drive further to reach City parks with shaded lots and the features they want in a park. The City seeks to have all residents living within walking distance of a neighborhood park. Key to this goal is having parks that meet the needs of area residents. The proposed project will achieve that for two City parks.

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<sup>1</sup> <https://www.fhwa.dot.gov/policy/otps/pubs/impacts/>

Additionally, the stormwater improvements will decrease long-term costs for the City to improve the quality of its stormwater. This will reduce costs for taxpayers.

Overall reductions in vehicle miles travelled will have costs savings through reduced wear on road infrastructure from vehicles, not only improving the longevity of the infrastructure but also reducing routine maintenance costs.

Finally, the potential development of the unutilized or underutilized sites along the S. 5<sup>th</sup> Ave corridor will result in increased tax revenues from commercial entities, which will offset the tax burned on residential properties.

## 2. Displacement Avoidance

While the redevelopment of S. 5<sup>th</sup> Ave. could increase property values, it is unlikely to cause mass displacement due to the nature of the corridor and proposed types of development. As noted, the mobile home park community members would otherwise not have the means to tie into the sewer system and would be highly cost burdened if they were required to do so without grant funds.

The proposed project aligns with the future land use map's vision for the corridor to create mixed-use development. This would provide needed housing development. By increasing the housing stock overall, the City can address an existing lack of affordable or attainable housing.

The grant proposal's sewer project will mitigate for potential displacement. The existing mobile home community will be tying into sewer at no cost to the residents, which would prevent their displacement from potential untenable costs to connect. The ability to use grant funding to connect these residents to sanitary sewer is transformative and enables the mobile home community to continue operating and connect to City sewer.

In addition, the creation of the multimodal greenway path connection will improve micro-mobility options as well as walkability. This will improve access to Pocatello Regional Transit, Bannock County Offices, Bannock County Jail, and Century High School. It also will make entities to the north (such as City Center, Ross Park, etc.) more accessible to residents of this area. Instead of moving to resolve the transportation desert, residents will now have improved mobility options. Individuals in poverty take about three times as many transit trips as those in the higher income groups. They also have the greatest rate of bike trips and take walk trips about 50% more than their higher income counterparts. When using personal vehicles, individuals in poverty are about twice as likely to travel in a multi-occupant vehicle. Average vehicle occupancy rate increases for those below poverty level and average vehicle ownership is lower for those in poverty necessitating access to alternative transportation modes.

The proposed park improvements will likely increase the property value of adjacent properties. As part of this project the City will be working with NeighborWorks Pocatello to increase the use of their free trailer for conducting residential yard improvement projects in the project area. Services such as this free trailer can help residents offset expenses and stay compliant with code requirements. In addition, the City can explore options, such as a TIF district, to retain new growth funds for investment in this area. The City offers numerous other programs through its

HUD funded programs as well as partners with local social service agencies to help mitigate any potential economic consequences of the new infrastructure development.



Attachment G - Readiness Approach

## Requirement 5 – Readiness Approach (8 points)

*Given the statutory requirement that all Community Change Grants must be completed within three years, applicants must describe their approach for initiating grant performance upon award, or generally within 120 days after award, in compliance with the requirements in 2 CFR Parts 200 and 1500, 40 CFR Part 33 that apply to all EPA grants so they can successfully complete the grant within the three-year period.*

*This includes addressing the readiness considerations listed below, and any others, that are applicable to the projects and how they will be met. If any of the below considerations are not applicable, the application should explain why not.*

The City has a successful history of completing projects in a timely manner and commits to successful implementation of all discussed grant activities within the three-year period of performance, in compliance with the requirements in 2 CFR Parts 200 and 1500, 40 CFR Part 33 that apply to all EPA grants. The City has recently been awarded federal grants through the Department of Housing and Urban Development (HUD) Environmental Protection Agency (EPA), US Department of Transportation (US DOT), and Department of the Interior (DOI). The City has efficiently and expeditiously negotiated and finalized federal grant agreements in accordance with these agencies and the related federal grant awards. This past experience will allow the City to facilitate a similar process and timely project initiation after the grant award.

### 1. Government Approvals

*If government approval at any level (e.g., construction permits) is necessary to implement or perform a project, the applicant must demonstrate that they have obtained such approval. If such approval has not been obtained, then the applicant must demonstrate how they will obtain it immediately after award, so it does not impede grant implementation.*

Project performance will begin immediately with significant outreach and community engagement. While local construction and right-of-way permits will not be granted until final design is complete, these approvals are minor and can be completed in less than 30 days.

Aspects of the project will require permits from Idaho Transportation Department (ITD) for work within the right-of-way on S. 5th Ave, as well as at the south end of the Greenway Trail where the trail will be within the ITD right-of-way. These permits certify that design standards, traffic control measures, and public safety during construction are established. The City of Pocatello and the Portneuf Greenway Foundation have worked with ITD in numerous other instances to successfully locate Greenway Trails within the ITD right-of-way. This permit approval will not impede project implementation and is anticipated to take 30 days.

A portion of the S. 5<sup>th</sup> Ave. Complete Streets project is currently in Bannock County. Project implementation will require a construction permit from Bannock County. The City of Pocatello and the Portneuf Greenway Foundation have worked with Bannock County in numerous other instances to successfully locate Greenway Trails within the Bannock County right-of-way. This permit approval will not impede project implementation and is anticipated to take 30 days.



Right of way acquisition for aspects of the project not within already owned public right of way will begin immediately upon execution of the grant agreement. The City of Pocatello has extensive experience with the acquisition of right-of-way for public transportation projects, and already has all the processes and procedures in place to ensure a smooth project delivery. The City of Pocatello has begun coordination with Bannock County with regards to the necessary right-of-way to be included in any current developments along the entire corridor, including annexation of property into the City limits. The project will not be restrained by the right-of-way acquisition process.

#### Environmental Permits and Reviews

The project is to be completed on existing built infrastructure, reducing environmental impact and risk. The City of Pocatello has carefully developed this project scope with stakeholder coordination to avoid project elements with high environmental risks. For example, staff selected proposed projects with the greatest benefits while remaining within the existing public right-of-way. The City does not anticipate any right-of-way impacts. The project will require obtaining Construction General Permits (for erosion and sediment control during construction) from Idaho DEQ for projects over one acre. The City of Pocatello and Bannock County will also require separate erosion and sediment control permits that they will each manage. This permitting process will be part of project final design and will not impede project construction. No NEPA will be required for this project as it falls under an exemption under Section 7(c) of the Energy Supply and Environmental Coordination Act of 1974 (15 U.S.C. 793(c)(1)), which exempts all EPA actions under the Clean Air Act from the requirements of NEPA.

Additionally, the project, except for the Greenway Trail, is located in a fully constructed urban area featuring several recent intersection projects and redevelopment. Additional pavement may result in new or updated stormwater infrastructure adjustments, increased stormwater pipes and inlets, and sub-surface seepage beds where storm drains are not present. Limited vegetation will be impacted, and both infrastructure and landscaping will be used to retain stormwater runoff and water quality improvements where possible. The Greenway Trail will be located along old farm roads in abandoned rangeland which has been heavily disturbed by nearby gravel pits. All runoff will be contained onsite, with no connection to Waters of the US.

#### 2. Federal Requirements for Construction Projects

*Applicants must demonstrate that they have systems in place, or a plan to have such systems in place immediately after the grant award, to comply with CAA § 314 and the Davis-Bacon and Related Acts prevailing wage requirement, the Build America Buy America domestic preference requirement, and other cross-cutting statutory and Executive Order requirements that apply to Federally funded construction projects.*

The City has a history of managing federally, state, and locally funded transportation projects of similar size and scope. The City has extensive experience completing projects in accordance with Federal requirements for construction including Davis-Bacon and Related Acts and the more recent Build America Buy America domestic preference requirement. The City has utilized funding from HUD and DOT in recent construction projects that included these regulations as well as other cross-cutting statutory and executive order requirements. This included a joint DOT



and HUD funded project which was required to comply with both agency's conditions. As a result, the City has policies and procedures as well as project documents, templates, and processes in place. Further, the City has worked closely with its government technical representatives from the respective federal agencies to ensure all required terms and conditions and regulatory requirements are included in the bid documents, contracts, or subrecipient agreements. The City has standard contract language to ensure all federal funding awards comply with the uniform requirements, including 2 CFR 200, as well as more specific federal requirements and regulations for the programs such as Buy America provisions, Davis-Bacon and Related Acts prevailing wage requirement, the Build America Buy America domestic preference requirement, ADA regulations, Civil Rights requirements, and other cross-cutting statutory and Executive Order requirements.

Further, the City employs both a Grants Manager and a Project Manager to provide administration of the federal program. Staff will ensure the funds are spent in accordance with all requirements and consider program requirements, racial and equity barriers to opportunity, labor and work standards, critical infrastructure security and resilience, domestic preference requirements, civil rights and Title VI, and federal contract compliance.

The City of Pocatello has adopted the 2020 Idaho Standards for Public Works Construction, which includes compliance with the requirements for federally funded construction projects. The City of Pocatello commits to compliance with 23 CFR 680 The City promotes all DBEs and utilizes the State of Idaho Associated General Contractors certified list of DBEs.<sup>1</sup>

### 3. Alignment with Existing Plans:

*Applicants must demonstrate that the project(s) in the Project Area as defined in Appendix A are consistent with any community development, climate resilience, or hazard mitigation plans, or other comparable government land use restrictions.*

This grant application has been developed in accordance with local plans, specifically:

Entity:	Date:
<b>City of Pocatello plans</b> <ul style="list-style-type: none"> <li>• Comprehensive Plan 2040</li> <li>• Pocatello does not yet have a Parks Plan</li> </ul>	2023
<b>Bannock Transportation Planning Organization Plans</b> <ul style="list-style-type: none"> <li>• Metropolitan Transportation Plan 2050</li> </ul>	2023
<b>Bannock County Plans</b> <ul style="list-style-type: none"> <li>• Bannock County Comprehensive Plan</li> <li>• All Hazard Mitigation Plan</li> </ul>	2020 2015
<b>Idaho Department of Environmental Quality plans</b> <ul style="list-style-type: none"> <li>• Idaho Environmental Guide: A Resource for Local Governments</li> </ul>	2023

The City of Pocatello has carefully developed this project scope with stakeholder coordination to develop projects that are in full alignment with all consistent with any community development, climate resilience, hazard mitigation plans, and other comparable government land use restrictions. By

<sup>1</sup> <https://web.idahoagc.org/Services/Certified-DBE>

focusing on an area of the City with the greatest sewerage needs based on aquifer contamination studies and greatest non-motorized transportation needs based on a lack of infrastructure to serve disadvantaged residents, the project is in direct alignment with all applicable planning, development, and environmental risk planning documents. The applicable elements of each plan are detailed in the tables below. .

**Table 1: Alignment with Pocatello Comprehensive Plan**

<p><u>Vision Statement</u> In 2040, Pocatello is a creative community that is: collaborative; outdoor oriented; economically robust; environmentally resilient; connect, safe, and accessible; and comprised of authentic and affordable neighborhoods.</p>		
<p><u>Vision Element:</u> <u>Environmentally Resilient.</u> In 2040, Pocatello’s residents embrace environmental resiliency resulting in increased community stewardship of the local and regional environment.</p>	<p>Goal 1: Protect and enhance the quality of ground and surface water resources in the Portneuf River Valley.</p>	<p>Strategy A. Connect all areas of the City to the sanitary sewer system to protect the aquifers from contamination.</p>
<p><u>Vision Element:</u> <u>Environmentally Resilient.</u> In 2040, Pocatello’s residents embrace environmental resiliency resulting in increased community stewardship of the local and regional environment.</p>	<p>Goal 5: Develop a transportation system that accommodates multi-modal choices to reduce dependence on fossil fuels.</p>	<p>Strategy C. Promote alternative transportation options by incentivizing walkable and bikeable development patterns. Strategy D. Monitor aquifer levels and water quality to ensure the continual recharge of our water supply and that contamination risks to our drinking water are fully mitigated.</p>
<p><u>Vision element: Connected, Safe &amp; Accessible</u> In 2040, Pocatello embraces Complete Streets by contextually designing streets for all modes of transportation that provide safe access to live, work, and play.</p>	<p>Goal 1: Develop a mobility network that interconnects and distributes pedestrian, bicycle, and vehicle traffic to multiple streets and nodes of activity.</p>	<p>Strategy A. Explore opportunities to improve connectivity in existing neighborhoods without widening existing streets, such as alternative transportation methods. Strategy B. Improve existing paths, sidewalks, curbs, and roadways. Strategy C. Create and maintain paths that connect</p>

		neighborhoods to activity centers.
<u>Vision element: Connected, Safe &amp; Accessible</u> In 2040, Pocatello embraces Complete Streets by contextually designing streets for all modes of transportation that provide safe access to live, work, and play.	Goal 5: Maintain and update existing infrastructure such as roads, sewer, water, and high-speed internet.	Strategy D. Create pedestrian-oriented strategies to ensure sidewalks, pathways, and public spaces are safe, attractive, and appropriately lit. Strategy E. Coordinate street and utility infrastructure projects to maximize efficiency and reduce excessive use of tax dollars.

**Table 2: Alignment with Bannock Transportation Planning Organization Metropolitan Transportation Plan 2050**

The 2050 transportation system will Enhance our community by advocating for a safe, interconnected multimodal transportation system that is environmentally and economically sustainable and supports quality of life for residents, businesses, and visitors.	
Goal 1: Provide a safe and secure multimodal transportation network.	
Goal 2: Promote and improve the mobility and accessibility of the transportation network, including roads, trails, sidewalks, bike paths, and transit.	Objective 2.1 – Identify and eliminate sidewalk and bike path gaps in the network by 2050. Objective 2.4 - Identify and promote nonmotorized access to foothill trails. Objective 2.7 – Promote the construction of sidewalks and bicycle facilities in all jurisdictions. Objective 2.8 – Identify, develop, and support projects by 2030 that improve connectivity between modes of transportation and for all user groups.
Goal 3: Develop a transportation network that supports an active, healthy, urban lifestyle.	Objective 3.2 – Work with public and private partners to develop programs encouraging walking and bicycling. Objective 3.4 – Develop and foster community and agency partnerships to support multimodal transportation.



Goal 5: Protect the environment by minimizing the impact of the transportation network on our natural resources.	Objective 5.1 – Develop guidelines and support water-wise landscaping, streetscapes, and green spaces.
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**Table 3: Alignment with Bannock County Comprehensive Plan**

Vision Statement includes: Protect and enhance residents’ “quality of life.”	
Objective 2.3 Support the development of pathways, trails and trailhead improvements throughout the County	2.3.1 Support regional efforts to expand existing trail and pathways systems and encourage sustainably designed trails and pathways via improved trail linkages, wayfinding, and new pathway/trail development, as funding and staff resources allow. 2.3.3 Promote development of amenities to trails and trailheads, when and where possible, such as trees, natural landscaping, restrooms, benches, viewing platforms, bike repair stations, picnic and play areas
Objective 2.4 Encourage parks, open space and waterways system development	2.4.1 Work with cities and towns to jointly plan for community-serving parks.
Objective 3.1 Establish standards to help keep water clean (i.e. aquifers, surface waters, drinking water sources, floodways, waterbodies, streams, rivers and community, municipal and domestic wells).	3.1.2 Evaluate the impact of septic system use and installation in vulnerable groundwater areas with Southeastern Idaho Public Health guidelines for septic systems. 3.1.3 Implement measures to assist in preventing and minimizing potential contamination to surface waters and wetlands from septic systems.
Objective 5.2 Support alternative transportation facilities to encourage walking, biking, public transit and freight movement throughout the County.	5.2.1 Incorporate bicycle and pedestrian facilities, appropriate for the particular location, in roadway maintenance and capital projects whenever opportunities arise and whenever feasible.

**Table 4: Alignment with Bannock County All Hazard Mitigation Plan**

Vision Statement includes: The focus of this Plan is on County-wide mitigation activities...”	
Develop Mitigation Strategy:	As required by FEMA, this planning effort is centered on community supported hazard reduction goals to be implemented and evaluated based on measurable objectives. Mitigation projects are to be assessed against the established goals and objectives to ensure that the selected projects reduce risk as desired.
Risk Assessment: Flash Flooding	There is repetitive loss due to flooding in Bannock County along the Portneuf River especially between Inkom and the City of Pocatello City Limits, which are within the FEMA FIRM designated floodplain. Flash Floods occur annually, especially in the Cities of Pocatello and Inkom. Flood waters have damaged homes, churches, schools, trailer courts, and have also damaged roadways.

**Table 5: Alignment with Idaho DEQ - Idaho Environmental Guide: A Resource for Local Governments**

Executive Summary: Local government entities often have primary responsibility for wastewater, storm water, and drinking water systems, as well as solid waste disposal services and systems. These entities also share a mutual responsibility toward sustainable development and protection of air, land, and water.	
3.4.1 Source Water Assessment and Protection	Research funding potential to replace septic systems with upgraded sewer systems. Implement groundwater quality protection policies within your jurisdiction.
2.2.1 Reduce emissions of air pollutants, including air toxics	Encourage employees and citizens to drive less.

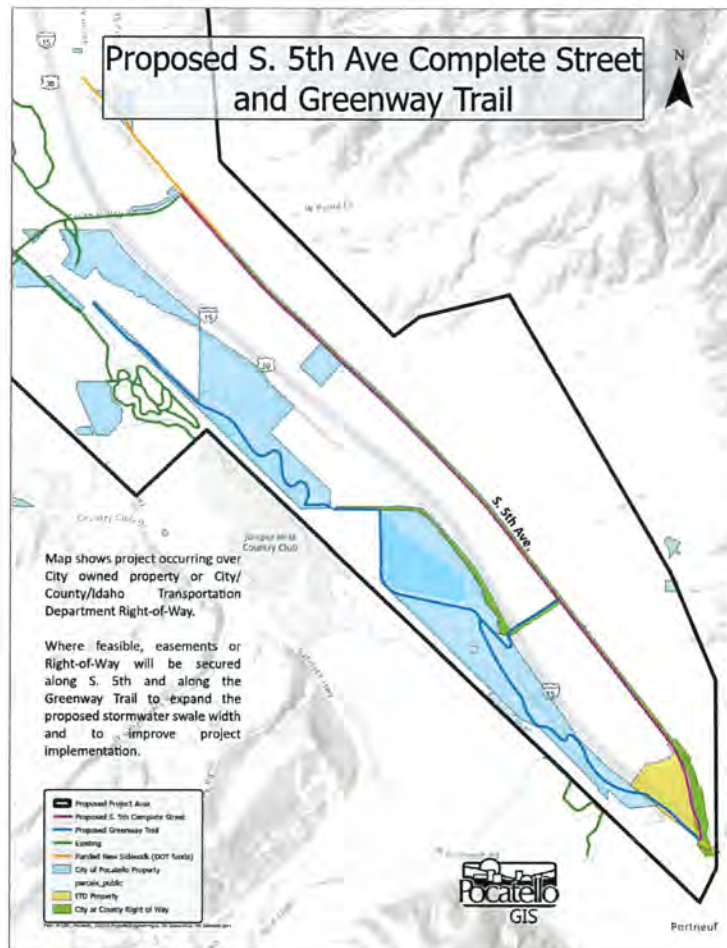
#### 4. Site Control:

Applicants must demonstrate that they own or control the site where a project will be performed or that they will have legally binding access or permission to the site so they can perform the project(s).

The proposed project will be implemented primarily on City-owned land or on City/County right-of-way. This includes all parks. The Greenway Trail map in Figure 1 (below) shows City-owned land and right-of-way in relation to project boundaries.

- **Drinking fountains** – all located in City-owned parks or along City Greenway Trails where the City has a Right-of-Way.
- **Sewer lines** – all located in the City Right-of-Way, except for connections to low income homes in these disadvantaged neighborhoods. These connections will only be done with landowner permission. The connections to private property are not required for project completion.
- **Park stormwater projects** – all located in City-owned parks.
- **Greenway Trail** – Located on City owned land or County/Idaho Transportation Department Right-of-Way. May be located on private land with landowner permission, but this is not required for project implementation.
- **S. 5<sup>th</sup> Ave Complete Street** – Located within the City/County/Idaho Transportation Department Right-of-Way along S. 5<sup>th</sup> Ave. Project seeks to use some adjoining private land, but this is not required for project implementation.

Figure 1: Project Land Ownership (larger image in Attachment D)





Essentially, there are two locations where additional easements or right-of-way are desired, although the project can be completed without these land acquisitions:

1. **Greenway Trail.** The project as designed will cut across private property at its southernmost edge. Funding has been set aside in the grant budget to purchase access. If this is not feasible, the trail will be modified to cut across Idaho Transportation Department right-of-way, similar to the Greenway Trail location in other part of the City. Based on existing conversations with the landowner, the City expects to purchase access from this private citizen.
2. **S. 5<sup>th</sup> Ave. Complete Street.** A complete street can be created within the existing 80' right-of-way. However, a buffered Greenway Trail could be provided with 15' of additional right-of-way. Funding has been set aside in the grant budget to purchase access. If a landowner refuses to provide access, the trail and buffer will be constructed within the existing Right-of-Way. This is a three-mile trail and based on existing conversations with landowners along this stretch, the City expects to purchase Right-of-Way for most of the road.

The proposed project design will be modified if access for a particular segment cannot be acquired in a timely manner. The outreach conducted by the City and its partners is a critical component of acquiring this access along S. 5<sup>th</sup> Ave. and at the southern end of the Greenway. This will be one of the first actions completed.

#### 5. Operations and Maintenance:

*Applicants must describe their operations and maintenance plan and financing approach for their project's infrastructure investments, if relevant, which may include long-term service costs, fee structures, detailed indebtedness for all properties, and other relevant information demonstrating how operations and maintenance of the investment will be assured during and after the grant award.*

The City Pocatello has prioritized funding to maintain existing assets. Ensuring the City capitalizes on its existing infrastructure is an important strategy to protect against building too much infrastructure that cannot be maintained adequately. By pursuing the vision for a multi-modal corridor, the community has been able to avoid plans that would have expanded the corridor. Instead, using lane expansions for dedicated turning lanes, and accommodating alternate modes of travel makes use of the public right-of-way by separating transit/pedestrian/bicycle users from active vehicle traffic. Because these improvements are included in the numerous aforementioned long-term plans, the City has anticipated this infrastructure and demonstrated support of it and its maintenance.

Sewer Lines: The City's Water Pollution Control Operations Department will maintain the sewer lines including long-term service costs and maintenance. The project will be included in future rate studies to ensure long-term maintenance continues.

Park Projects, including Drinking Fountains: The City's Parks Department will maintain the drinking fountains and any park improvements, except for stormwater features that treat stormwater from City streets. These stormwater features will be maintained by the City's street department and will be included in their budget.

Sidewalks and Swale Landscaping: Per City and Bannock County Code, sidewalks and landscaping in the Right-of-Way are to be maintained by the property owner adjacent to the sidewalk, including replacement if needed. The City's code enforcement office sends out notices to property owners if their sidewalk needs to be replaced or repaired. The City will clean sediment out of the swales collecting stormwater from City/County streets.

Greenway Trail: These features will be maintained by a combination of the City of Pocatello and the Portneuf Greenway Foundation. The Foundation will assume responsibility for maintenance of all trails outside of City limits. The Foundation will also work with the City to improve maintenance of the trails within the City.

Attachment H - Compliance Plan



## **Compliance Plan**

The City of Pocatello is a municipal corporation of Idaho. As such, the City has extensive experience managing local, state, and federal funding including grant awards. The City is subject to its municipal code, Idaho Code, and federal code requirements. As a recipient of federal funds, the City has experience in compliance with 2 CFR 200 and ensures its financial management, internal controls, and pass-through requirements are adhered to. Further, the City employs and engages the appropriate staff to address any compliance issues.

The City has demonstrated a history of complying with and administering grant terms and conditions. Specifically, the City's history of managing Federal Aviation Administration (FAA) funds, Federal transit Authority (FTA) funds, Federal Highway Administration (FHWA) funding, Housing and Urban Development (HUD) funding, Department of Transportation (DOT) funding, Department of Justice (DOJ) funding, and Environmental Protection Agency (EPA) funding is demonstrative of its ability to comply with grant terms and conditions as these awards have been recurring annual entitlements that have passed audits and monitoring and/or are grant awards that have been closed out and successfully managed.

The City adheres to Generally Accepted Accounting Principles (GAAP) and Government Auditing Standards issued by the Financial Accounting Standards Board (FASB) and the Governmental Accounting Standards Board (GASB). In addition, the City hires an Independent Auditing firm to conduct an annual Audit of the City's fiscal year and produce a Comprehensive Annual Financial Report (CAFR) that complies with Single Audit Requirements of 2 CFR 200. The City has required internal controls including purchasing policies, procurement policies, investment policies, and others. The City employs a Finance Department with adequate staff and controls for proper financial management. Specifically, in accordance with 2 CFR 200.302(b), the City is able to identify all federal awards received in its accounting system. The City maintains the FAIN, year, and name of the Federal agency and passthrough (as applicable). The City's accounting system allows for separation of funds and grant revenues in order to ensure there is no intermingling of funds, funds are not supplanted, and fund sources comply with interest and investment requirements. The City maintains these records in accordance with City record retention policies and the Grant specific record retention requirements. Records include federal wards, authorizations, financial obligations, unobligated balances, assets, expenditures, income and interest. The City also maintains asset management, ensuring accountability for all funds property, and other assets (such as equipment). The City's account tracking software is able to compare expenditures with budget amounts for Federal awards. All Federal awards (or grant awards) must be authorized in the City's fiscal year budget through Council approval. These processes are articulated in the City's written financial policies and procedures or grant-specific policies and procedures, as adopted by the City and approved by the granting agency.

To manage internal controls in accordance with 2 CFR 200.303, the City ensures a separation of duties and series of checks and balances for internal controls. When accepting the Grant Award, the City executes a Grant Agreement with the awarding agency, ensuring compliance

In the event the City serves as a pass-through entity and provides subawards to subawardees/subrecipients, the City adopts a Subrecipient Agreement to ensure compliance with all federal requirements. This has been demonstrated by the City's Community Development Block grant (CDBG) program which has awarded Subrecipients throughout the duration of its entitlement status (since 1997). The Subrecipient Agreement includes all requirements of the pass-through entity, including, but not limited to, federal award identification and subsequent required sections as articulated in 200.332 as well as reporting requirements and monitoring requirements. The Subrecipient Agreement is reviewed by the City's Legal Department and signed and notarized by the City's Authorizing Official and the Subrecipients executive authority.

In addition to the Finance Department Staff, the City employs a Grants Manager who is responsible for project reporting and oversight of grant terms and conditions. The Grants Manager is the point of contact between the federal awarding agency and the City, ensuring open communication and adherence to grant requirements. This ensures the City can proactively address any potential issues and preempt project changes such as the need for formal grant agreement amendments and project cost changes.

For broader legal and compliance risks, the City employs a Legal Department and requires appropriate language, terms, conditions, and provisions in its contracts to ensure compliance with grant specific terms and conditions as well as those of the State of Idaho and City of Pocatello. This includes insurance requirements, indemnification clauses, and termination clauses.

**FEDERAL AGENCY AND OFFICE:** U.S. Environmental Protection Agency, Office of Environmental Justice and External Civil Rights (OEJECR)

**FUNDING OPPORTUNITY TITLE:** Environmental and Climate Justice Community Change Grants Program

**ANNOUNCEMENT TYPE:** Notice of Funding Opportunity (NOFO)

**FUNDING OPPORTUNITY NUMBER:** EPA-R-OEJECR-OCS-23-04

**ASSISTANCE LISTING NUMBER:** 66.616

**IMPORTANT DATES:**

November 21, 2023	<b>NOFO Opening Date</b>
November 21, 2024	<b>Application Closing Date</b>
March 2024	<b>Initial Award Selections</b>
May / June 2024	<b><u>Anticipated</u> Start of Period of Performance for Initial Selections</b>

**DEADLINE:** Application packages will be accepted on a rolling basis, as further explained in the NOFO, until November 21, 2024, at 11:59 PM (Eastern Time) through Grants.gov. Applications received after the closing date and time will not be considered for funding.

In alignment with EPA’s commitment to conducting business in an open and transparent manner, copies of applications selected for award under this NOFO may, as appropriate, be made publicly available on the OEJECR website or other public website for a period after the selected applications are announced. Therefore, applicants should clearly indicate which portion(s) of the application, if any, they are claiming contains confidential, privileged, or sensitive information. As provided at 40 CFR § 2.203(b), if no claim of confidential treatment accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to the applicant.

**NOTE:** Prior to naming a contractor (including consultants) or subrecipient in your application as a “partner,” please carefully review Section IV.d, “Contracts and Subawards,” of EPA’s Solicitation Clauses that are incorporated by reference in this NOFO in [Section I.J](#). EPA expects recipients of funding to comply with competitive procurement contracting requirements as well as EPA’s rule on Participation by Disadvantaged Business Enterprises in EPA Programs in 40 CFR Part 33. The Agency does not accept justifications for sole source contracts for services or products available in the commercial marketplace based on a contractor’s role in preparing an application or a firm or individual’s “unique” qualifications.



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## Section I. Funding Opportunity Description

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### A. Background: Inflation Reduction Act and Executive Orders

The Environmental and Climate Justice Community Change Grant program (Community Change Grants) – the subject of this NOFO – offers an unprecedented opportunity to transform disadvantaged communities across the United States into healthy, climate resilient, and thriving communities for their current and future residents. The Community Change Grants will fund community-driven projects that address climate challenges and reduce pollution while strengthening communities through thoughtful implementation. The historic levels of support provided by these grants will enable communities and their partners to overcome longstanding environmental challenges and implement meaningful solutions to meet community needs now and for generations to come.

The Inflation Reduction Act (IRA) created the Environmental and Climate Justice Program (ECJP)—the largest investment in environmental and climate justice in U.S. history—when it was signed into law by President Biden on August 16, 2022. The ECJP is now contained in Section 138 of the Clean Air Act (CAA), 42 U.S.C. § 7438. Under this program, EPA was provided \$2.8 billion to award grants to help disadvantaged communities address a wide range of environmental and climate justice issues, and \$200 million for technical assistance related to these grants. This historic investment advances [Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#), which established a whole-of-government approach to advancing equity and opportunity, and [Executive Order 14008, Tackling the Climate Crisis at Home and Abroad](#), which created the government-wide [Justice 40 Initiative](#) that established the goal that 40 percent of the overall benefits of certain federal investments flow to disadvantaged communities. Awards under the ECJP also support core goals of [Executive Order 14091, Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#), and [Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All](#).

The Community Change Grants are the final and most comprehensive piece of EPA's implementation of ECJP IRA funding. The Community Change Grants will complement grant programs that EPA launched in 2022 and 2023, including those for the Collaborative Problem-Solving, Government-to-Government, and Thriving Communities Grantmaker programs. Collectively, these programs will empower communities and their partners to design, develop, and implement multi-faceted community-driven projects. These programs will address the diverse and unique needs of disadvantaged communities by:

1. Reducing and preventing pollution;
2. Building resilience to climate change and mitigating current and future climate risks;
3. Enhancing meaningful involvement in government processes related to environmental and climate justice;
4. Expanding access to high-quality jobs and economic opportunity through workforce development; and
5. Bolstering community strength by ensuring that local residents receive the benefits of investments and have the opportunity to build on them for current and future generations.

Through the approximately \$2 billion to be awarded under the Community Change Grants, and the technical assistance that will be available to eligible applicants related to the grants, EPA will advance the goals of these Executive Orders (EO) and the agency's environmental and climate justice priorities. [Environmental justice](#), as defined by EO 14096, means the just treatment and meaningful involvement of all people,



regardless of income, race, color, national origin, Tribal affiliation, or disability, in agency decision-making and other federal activities that affect human health and the environment so that people:

- Are fully protected from disproportionate and adverse human health and environmental effects (including risks) and hazards, including those related to climate change, the cumulative impacts of environmental and other burdens, and the legacy of racism or other structural or systemic barriers; and
- Have equitable access to a healthy, sustainable, and resilient environment in which to live, play, work, learn, grow, worship, and engage in cultural and subsistence practices.

## B. Statutory and Regulatory Authority

The authority for the awards under this NOFO is Clean Air Act (CAA) § 138, codified at 42 U.S.C. § 7438. Of the \$2.8 billion appropriated, approximately \$2 billion will be awarded for the Community Change Grants under this NOFO. As provided in 42 U.S.C. § 7438(a)(1) and (b)(1), all the funds must be awarded by September 30, 2026, the grants cannot be longer than three years in duration, and no extensions will be granted.

Eligible entities and eligible activities are defined in 42 U.S.C. § 7438(b)(2) and (3) and are further described below and in [Section I](#) and [Section III](#) of this NOFO.

Section 138(b)(2) of the CAA specifies that an eligible entity may use a grant awarded under this NOFO for:

1. community-led air and other pollution monitoring, prevention, and remediation, and investments in low and zero-emission and resilient technologies and related infrastructure and workforce development that help reduce greenhouse gas emissions<sup>1</sup> and other air pollutants;
2. mitigating climate and health risks from urban heat islands, extreme heat, wood heater emissions, and wildfire events;
3. climate resiliency and adaptation;
4. reducing indoor toxics and indoor air pollution; or
5. facilitating engagement of disadvantaged communities in state and federal advisory groups, workshops, rulemakings, and other public processes.

In addition, Section 102(2)(I) of the National Environmental Policy Act, 42 U.S.C. § 4332(2)(I) is applicable to international work, if any, under this NOFO. Further, all funded activities under this NOFO must comply with federal, state, and local laws and regulations, including but not limited to:

1. 2 CFR 200.435(b), which restricts the use of grant funds to defend a recipient that is subject to a criminal, civil or administrative proceeding against it commenced by any government for fraud or similar offenses;
2. 2 CFR 200.435(g), which precludes the use of grant funds to prosecute claims against the Federal Government; and
3. 2 CFR 200.450(c), which restricts the use of federal funds by nonprofit organizations for certain lobbying or electioneering activities but does not preclude the use of federal funds to promote adoption of local ordinances, including those related to zoning.

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<sup>1</sup> “Greenhouse gas” means the air pollutants carbon dioxide, hydrofluorocarbons, methane, nitrous oxide, perfluorocarbons, and sulfur hexafluoride.

4. 40 CFR Parts 5 and 7, which prohibit discrimination on the basis of race, color, national origin (including limited-English proficiency), disability, sex, and age by recipients and subrecipients of federal financial assistance.

### C. Community Change Grants Objectives

The Community Change Grants will support comprehensive community and place-based approaches to redressing environmental and climate injustices for communities facing legacy pollution, climate change, and persistent disinvestment. These concentrated local investments will fund community-driven, change-making projects that center collaborative efforts for healthier, safer, and more prosperous communities.

Designed with meaningful community, Tribal, and other stakeholder involvement, the investments EPA makes through the Community Change Grants are intended to achieve the following objectives:

1. Provide resources for community-driven projects to address environmental and climate challenges in communities facing disproportionate and adverse health, pollution, and environmental impacts, and suffering from generations of disinvestment.
2. Invest in strong cross-sectoral collaborations with partners who bring a robust commitment to working with and for communities with environmental and climate justice concerns.
3. Unlock access to additional and more significant resources to advance environmental and climate justice goals from across the federal government and other sources.
4. Empower communities and strengthen their capacity to drive meaningful positive change on the ground for years to come.
5. Strengthen community participation in government decision-making processes that impact them.

### D. NOFO Competition Features

EPA anticipates awarding approximately \$2 billion in funding through this NOFO, depending on funding availability, quality of applications received, EPA priorities, and other applicable considerations. EPA will consider applications under two separate tracks.

- **Track I applications – Community-Driven Investments for Change** will focus on multi-faceted applications with Climate Action and Pollution Reduction Strategies to meaningfully improve the environmental, climate, and resilience conditions affecting disadvantaged communities. Awards under Track I are expected to be \$10-20 million each and cannot exceed \$20 million. EPA expects to award approximately \$1.96 billion for approximately 150 Track I awards, including those under the Target Investment Areas described in Section II.B.
- **Track II applications – Meaningful Engagement for Equitable Governance** will facilitate the engagement of disadvantaged communities in governmental processes to advance environmental and climate justice. Awards under Track II are expected to be \$1-3 million each and cannot exceed \$3 million. EPA will award approximately \$40 million for approximately 20 Track II awards.

The number of Track I and Track II awards are estimates, and EPA reserves the right to increase or decrease the total number of awards and dollar amounts for each track, contingent on the quality of applications received, the amount of funds awarded to selected applicants, budget availability, agency priorities, programmatic considerations, or a combination of these.



**Target Investment Areas for Track I Applications:** EPA has identified five Target Investment Areas (TIA) to help ensure that communities with unique circumstances, geography, and needs can equitably compete for funding (see [Section II.B](#)). Applicants applying under a specified TIA will compete against other applicants under the same TIA, as opposed to the broader application pool. Please note that applicants applying for the TIA for Alaska Tribal lands should review Appendix H for additional guidance pertaining to the Climate Action and Pollution Reduction Strategies to include in their application, including those related to the Alaska Native Claims Settlement Act (ANCSA).

**Eligible Applicants:** Eligible applicants for the Community Change Grants include a partnership between two community-based non-profit organizations (CBOs), or a partnership between a CBO and one of the following: a Federally recognized Tribe, a local government, or an institution of higher education (IHE), including Minority Serving Institutions as further described in [Section III.A](#). Other organizations and entities may participate in the Community Change Grants as Collaborating Entities through subawards, or as contractors selected in accordance with competitive procurement requirements. Further details about applicant eligibility, partnership requirements, Collaborating Entities, subawards, and procurement contracts are in [Section III](#).

Under this NOFO, Lead Applicants, as defined in [Section III.A](#), may submit a maximum of two applications and may receive up to two awards, if they demonstrate the capacity and capabilities to effectively perform, manage, oversee, and complete the awards within the three-year grant period of performance. The two applications may be two Track I applications, two Track II applications, or one of each. Lead Applicants who submit more than two total applications will be asked to withdraw the excess one(s). EPA will not review more than two applications from any one Lead Applicant.

In addition, EPA is introducing several features to enhance community involvement and ease the application process. Unless otherwise noted, the following applies to both Track I and Track II applications:

- **Rolling Applications.** EPA will allow applications to be submitted on a rolling basis over a 12-month period, through November 21, 2024, and will permit applicants to resubmit an unsuccessful application after a debriefing with the agency. Further details about the rolling application and resubmission process are in Sections II and V.
- **Fast-Tracked Approach.** EPA will review and expeditiously select high-quality applications to deliver results and benefits to disadvantaged communities. Further information is in [Section V](#).
- **Indirect Costs Limitation.** As further described in Appendix G, there is a 20% cap on indirect costs for certain recipients and subrecipients.
- **Track I Two-Phase Evaluation Process.** Applicants for Track I whose applications score well following the written application review will be invited to participate in an oral presentation, as further described in [Section V](#), at which they will have an opportunity to share information about the community-oriented nature of their projects and how they will successfully implement the grant. The Track II application process does not involve an oral presentation.

## E. Technical Assistance

Under the IRA, EPA received \$200 million for technical assistance to eligible entities in connection with the ECJP. Technical assistance will be available for pre-award technical assistance including but not limited to designing a project, preparing an application, or facilitating partnerships, and for post-award technical assistance to help grant recipients manage, oversee, perform, and report on the grants. Further details about technical assistance can be found [here](#). Receiving technical assistance does not guarantee that applicants will be selected for funding.



## F. Community or Tribal Relocation Resources

Projects for community or Tribal relocation activities are not eligible for funding under this NOFO and will not be reviewed. For purposes of this NOFO, relocation activities generally include activities intended to plan or assist the moving of an individual from their residence or a business from its place of business.<sup>2</sup> EPA is working with other federal agencies on a separate and tailored effort to develop a support mechanism for communities that want to implement community-driven relocation plans. EPA intends to share relocation assistance information in future guidance [posted on the Community Change Grants website](#). In the interim, information related to Federally-assisted relocation can be found on [FEMA's webpage](#) and in the [HUD Climate Resilience Implementation Guide for Community Driven Relocation](#). Any questions about whether an activity is considered a relocation activity should be sent by email to [CCGP@epa.gov](mailto:CCGP@epa.gov) prior to applying.

## G. Funding Track I: Community-Driven Investments for Change

### 1. Track I Objectives

Track I is the primary emphasis for the Community Change Grants. These projects will be implemented through strong collaborations to achieve sustained impacts related to climate resilience, pollution reduction, community health, economic prosperity, and community strength. This approach catalyzes change by focusing on the following objectives:

- **Increase community resilience through climate action activities:** Implement comprehensive Climate Action Strategies and infrastructure that build the resilience and adaptive capacities of communities, reduce greenhouse gas (GHG) emissions, and better prepare for and reduce the impacts of climate change.
- **Reduce local pollution to improve public health:** Reduce and remediate quantifiable health-harming pollutants to improve public health.
- **Center meaningful community engagement:** Conduct robust community engagement throughout the project – from design to implementation.
- **Build community strength:** Develop strategies to increase the likelihood that benefits of the investments accrue to existing residents of disadvantaged communities, both immediately and sustainably beyond the grant period.
- **Reach priority populations:** Support people within the Project Area as described in Appendix A who are acutely exposed to and impacted by climate, pollution, and weather-related threats, and / or who exhibit acute vulnerabilities to the impacts of environmental pollution.<sup>3</sup>
- **Maximize integration across projects:** Ensure that the projects and activities within the Project Area are integrated and complement each other to maximize benefits.

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<sup>2</sup> The Uniform Relocation Assistance and Real Property Acquisition Policies Act, 42 U.S.C. § 4601 et seq. (URA) would apply if a construction project funded through a Community Change Grant has an incidental effect of permanently displacing residents or businesses.

<sup>3</sup> This may include populations of concern as identified in [The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment \(2016\)](#) that “experience disproportionate, multiple, and complex risks to their health and well-being in response to climate change,” such as children and pregnant women, older adults, and those with low incomes, limited-English-proficiency, disabilities or chronic medical conditions, or other risks that may put them at greater vulnerability.



## **2. Track I Community Vision Description**

Track I applications should be rooted in addressing specific, community-driven environmental justice challenges. Accordingly, Track I applications should begin with a Community Vision Description that, at a minimum, provides an overview of the Project Area community to benefit from the grant, a clear description of the challenges the community faces, and a vision for how the grant will respond to those challenges to advance environmental and climate justice in the community. This description should provide essential context for the rest of the application, informing how the Climate Action and Pollution Reduction Strategies were selected and the positive impact the applicant envisions the grant will have in the community. The Community Vision Description is further described in [Section IV.B: Content of Application Submission](#).

## **3. Track I Application Requirements**

Track I applications must address the following six requirements, as further described below. Additional information about the contents of the Project Narrative for Track I applications can be found in [Section IV.B: Content of Application Submission](#) and information about how applications will be evaluated can be found in [Section V.C: Track I Application Review Process, Evaluation Criteria, and Oral Presentations](#).

**Requirement 1. Climate Action Strategy:** Applications must include at least one project aligned with at least one of the Climate Action Strategies as described below. The Climate Action Strategies focus on strengthening the community's climate resilience and / or reducing GHG emissions. Climate Action Strategies should be responsive to the community challenges described in the Community Vision Description.

**Requirement 2. Pollution Reduction Strategy:** Applications must include at least one project aligned with at least one of the Pollution Reduction Strategy as described below. The Pollution Reduction Strategy can include monitoring, prevention, reduction, and remediation activities that support community efforts to address quantifiable and health-harming pollutants. Pollution Reduction Strategies range broadly depending on the type and pathway of pollution (e.g., indoor, or outdoor air pollution, water pollution, soil pollution). Pollution Reduction Strategies should be responsive to the community challenges described in the Community Vision Description.

**Requirement 3. Community Engagement and Collaborative Governance Plan:** Successful implementation of environmental and climate justice projects requires relationships among an ecosystem of community leaders and members along with partners across varied sectors. To help ensure that the community itself drives project development and implementation, applicants must submit a Community Engagement and Collaborative Governance Plan which should demonstrate how the applicant will inform, respond to, and engage community members throughout project development and implementation. This plan should include a Collaborative Governance Structure, which describes the roles and responsibilities of the Lead Applicant, Collaborating Entities, and community residents in implementing the project.

**Requirement 4. Community Strength Plan:** Applicants must submit a Community Strength Plan that describes how their proposed projects will enhance the overall strength and economic prosperity of the community, including maximizing the benefits of the projects for existing residents and minimizing potential risks associated with investing significant resources into the Project Area. This should include strategies for how the projects will promote inclusive economic development, drive benefits of the projects to existing residents, and proactively address unintended displacement consequences. This plan should speak to how the projects will enhance the overall wellbeing of the community, ensuring existing



community members receive the benefits of these investments and can build on those benefits for future generations.

**Requirement 5. Readiness Approach:** Given the statutory requirement that all Community Change Grants must be completed within three years, applicants must describe how they will be able to initiate grant performance upon award, or generally no later than 120 days after award, so they can successfully complete the grant within the three-year period of performance.

**Requirement 6. Compliance Plan:** Applicants must submit a Compliance Plan that describes how they will: (1) ensure compliance with the grant's terms and conditions, including 2 CFR § 200.302(b) (financial management), 2 CFR § 200.303 (internal controls), and 2 CFR § 200.332 (requirements for pass-through entities); and (2) manage broader legal and compliance risks.

### **Details of Track I Application Requirements**

**Requirement 1. Climate Action Strategies:** Applicants must include at least one project aligned with at least one of the Climate Action Strategies identified below. When addressing the strategy in their application, applicants should describe relevant challenges faced in the Project Area and how the selected Climate Action Strategy(ies) and associated project(s) will address those challenges. Each Climate Action Strategy outlined below is focused on building short-term and long-term climate resilience, reducing GHGs, and providing additional co-benefits so that impacted communities can adapt to the changing climate. Applicants are also encouraged, as applicable, to integrate processes that minimize burdens to human health and the environment while maximizing benefits to the Project Area through such means as integrating nature-based solutions, utilization of low-carbon building materials, or sourcing sustainable products and materials to perform the projects. When selecting a Climate Action Strategy and designing their climate action projects, applicants may refer to the [National Climate Resilience Framework](#) released in September 2023.

Examples of project activities and guidelines associated with the strategies can be found in Appendix C. While applicants may select from among the examples in the Appendix, applicants may also submit other types of project activities as long as they are consistent with a Climate Action Strategy described in [Section I.G](#) of the NOFO and are eligible for funding under §138(b)(2) of the CAA.

#### **Strategy 1: Green Infrastructure and Nature-Based Solutions**

Many disadvantaged communities face complex climate challenges, such as urban heat island effects and flooding risks. Strategy 1 supports using nature-based solutions (NBS), also referred to as green infrastructure, to address such climate risks. Nature-based solutions are generally actions to protect, sustainably manage, or restore natural systems to address the impacts of climate change, while simultaneously providing benefits for people and the environment.<sup>4</sup> Projects under this strategy can include planting shade trees, restoring native plants and wetlands to capture stormwater, and deploying other green infrastructure solutions that often have the co-benefit of reducing GHG emissions. Communities also may incorporate vegetation or similar natural features into traditional infrastructure.

#### **Strategy 2: Mobility and Transportation Options for Preventing Air Pollution and Improving Public Health and Climate Resilience**

Many disadvantaged communities lack access to affordable low- or zero-emission transportation options, leading to disproportionate difficulties in daily life, limiting access to educational and

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<sup>4</sup> Applicants may use the White House's [Nature-Based Solutions Resource Guide](#) as a resource for integrating nature-based solutions.



economic opportunities, and creating vulnerability to climate risks. Strategy 2 focuses on providing community members with access to low- and zero-emission technologies to improve their overall health and well-being, reduce emissions, and increase access to important community destinations such as schools, workplaces, health care centers, and community spaces. Projects funded under this strategy may include installing protected bike lanes or walking paths, supplying traditional or electric bikes to community members, and deploying other low- or zero-emission transportation solutions. The impact of such projects could include improved public health outcomes, reduced GHG emissions from the transportation sector, more equitable access to community resources, increased community connectivity and safety, and greater community resilience to extreme weather events.

### **Strategy 3: Energy-Efficient, Healthy, and Resilient Housing and Buildings**

Residential and commercial buildings are a significant source of GHG emissions due to the large amounts of electricity consumed for heating, cooling, lighting, and other similar functions. Many disadvantaged communities also face a disproportionately high energy burden, defined as the percentage of gross household income spent on energy costs. Many factors can influence high energy burden, including higher-cost fuels, such as propane or other bottled fuels, and energy-inefficient homes due to a lack of insulation in older homes or older appliances. Strategy 3 supports investments in low- and zero-emission technologies and energy efficiency upgrades that can help decarbonize residential and commercial buildings, decrease energy burden, and increase resilience for communities. Many of these activities also contribute to positive public health outcomes by improving indoor air quality and the safety and comfort of buildings. Co-benefits associated with this strategy can be maximized by combining additional Climate Action and Pollution Reduction Strategies to improve indoor air quality and / or produce additional resiliency benefits. This strategy can support a range of residential and commercial buildings, including single-family homes, multi-family housing buildings, small businesses, community health facilities, community centers, nonprofit offices, schools, and other similar community-serving buildings.

### **Strategy 4: Microgrid Installation for Community Energy Resilience**

Many disadvantaged communities suffer from unreliable access to electricity, a problem that is becoming more acute due to increased heating and cooling demands during extreme weather events driven by climate change. Strategy 4 supports the installation of microgrids powered by low- and zero-emission renewable energy to improve electric reliability, enhance overall energy efficiency, reduce emissions of GHG and other air pollutants, and build a community's capacity to prepare for and withstand power disruptions. The U.S. Department of Energy defines microgrids as "a group of interconnected loads and distributed energy resources within clearly defined electrical boundaries that acts as a single controllable entity with respect to the grid." A microgrid can operate autonomously when disconnected from the grid or when there is no grid to connect to, such as in some remote communities. When connected and operated with the grid, a microgrid can provide grid ancillary services.

### **Strategy 5: Community Resilience Hubs**

Many disadvantaged communities lack the resources to evacuate in a safe and timely manner when disaster strikes or is imminent. Strategy 5 supports the creation of, or upgrades to, community-level resilience hubs, which are public-serving spaces that provide shelter and essential services during extreme weather, natural hazards, or other events causing or contributing to an emergency or disaster, such as dangerous wildfire woodsmoke, toxic releases, industrial fires, or similar hazardous chemical incidents. These community-level resilience hubs can also serve as community-convening spaces that provide educational activities and related emergency and disaster preparedness resources to community residents year-round.

### **Strategy 6: Brownfield Redevelopment for Emissions Reduction and Climate Resilience**

Many disadvantaged communities contain brownfield sites that impede economic development. Redeveloping brownfields provides an opportunity to make investments that contribute to community revitalization, resilience, and GHG emissions reduction. Redeveloping brownfield sites also supports infill development that significantly reduces residential vehicle use and the associated GHG emissions. Strategy 6 supports the redevelopment of brownfield sites that have already been cleaned up, or where a site assessment indicates that cleanup is not necessary for reuse. These projects should seek to improve energy efficiency through investments in low- and zero-emission technologies, integrate climate resiliency, and / or mitigate climate change impacts while also promoting economic development and improving public health for residents. Examples could include construction of a public park or partnering on a LEED Certified low-income housing project on a former brownfield site.

Note: Projects funded under this Climate Action Strategy must be performed on sites where cleanup is complete or where the site does not require any cleanup activities for the intended use or reuse of the site.

### **Strategy 7: Waste Reduction and Management to Support a Circular Economy**

Disadvantaged communities often bear the brunt of environmental contamination from improper disposal of physical waste, or from disposal in landfills adjacent to those communities. This strategy supports circular economy<sup>5</sup> activities and promotes sustainable use of natural resources to keep materials and products in circulation for as long as possible, resulting in the reduction of GHG emissions and other pollution across a product's lifecycle. Examples of these projects may include efforts to reduce food waste (e.g., composting, anaerobic digestors), or to promote the reduction, reuse, and recycling of disaster debris, construction and demolition debris, and other materials and products. Project activities should demonstrate that they will result in materials being diverted from end-disposal facilities (e.g., landfills, incinerators) to reduce GHG emissions, toxic air pollution, and soil and water pollution.

### **Strategy 8: Workforce Development Programs for Occupations that Reduce Greenhouse Gas Emissions and Air Pollutants**

Individuals in disadvantaged communities often lack pathways into fast-growing and well-paying job opportunities related to environmental and climate justice. This strategy allows applicants to propose workforce development programs to enable individuals in these communities to pursue career pathways in fields related to the reduction of GHG emissions and other air pollutants. Strong workforce development proposals should include all three of the following features, as detailed in Appendix C: (1) multi-sectoral partnerships that bring together workforce expertise and enable pathways into high-quality careers that help reduce GHG emissions and other air pollutants; (2) high-quality training models, such as pre-apprenticeships or Registered Apprenticeship Programs, that are worker-centered, demand-driven, and lead to good jobs that help reduce GHG emissions and other air pollutants; and (3) strategies for recruiting and retaining individuals from disadvantaged communities, especially for populations that face barriers to employment. Given that workforce development opportunities can be significant to achieving environmental and climate justice in many communities, EPA anticipates making a minimum of fifteen awards for high-ranking applications that include a workforce training program as further described in [Section V.E](#). Note that it is a statutory requirement that workforce development activities funded under this program be focused specifically on reducing greenhouse gas emissions and other air pollutants.

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<sup>5</sup> A circular economy keeps materials, products, and services in circulation for as long possible.



**Requirement 2. Pollution Reduction Strategies:** Applications must include at least one project aligned with at least one of the Pollution Reduction Strategies identified below. When addressing the strategy in their application, applicants should describe relevant challenges faced in the Project Area and how the selected Pollution Reduction Strategy(ies) will address those challenges. Each Pollution Reduction Strategy outlined below is focused on pollution monitoring, prevention, and remediation of quantifiable and health-harming pollutants.

Applications that include activities to increase monitoring capabilities or raise community awareness of pollution must also include an associated remediation, implementation, or infrastructure pollution reduction project that addresses the identified pollution issue.

Examples of project activities and guidelines associated with the strategies can be found in Appendix D. While applicants may select from among the examples in the Appendix, applicants may also submit other types of project activities as long as they are consistent with a Pollution Reduction Strategy described in Section I.G of the NOFO and are eligible for funding under §138(b)(2) of the CAA.

**Strategy 1: Indoor Air Quality and Community Health Improvements**

Disadvantaged communities often face high levels of indoor air pollution from several sources, including mold, lead paint, radon, asbestos, fossil fuel combustion, and pollution from outdoors that seeps inside. These pollutants can have a detrimental impact to human health, particularly for vulnerable populations including children, the elderly, and people with health conditions like asthma and heart disease.<sup>6</sup> Activities under Strategy 1 can include education on air toxins / toxics and how to monitor them (e.g., curriculum development, outreach strategies, public education activities) and direct assessment and remediation to reduce harmful air pollution (e.g., installation of filtration systems, building retrofits that address multiple sources of pollution, replacement of wood heaters that do not meet EPA standards, asbestos abatement in schools).

**Strategy 2: Outdoor Air Quality and Community Health Improvements**

Outdoor air pollution from mobile and stationary sources can compromise human health and the environment in many ways, including by triggering asthma attacks and heart attacks, exacerbating respiratory disease, and causing children and adults to miss school and work on bad air days. Activities funded under Strategy 2 could include: funding the purchase, upgrade, and / or maintenance of equipment and technology to allow for the inspection, testing, monitoring, and sampling of air pollution; purchasing equipment that limits community exposure to outdoor air pollutants; and reducing exposure to near-road pollution, pollution from airports and ports, and mobile source pollution. This could include land use and zoning policies that enable households to live in affordable, dense, and vibrant communities within urban and rural areas. These activities can be bolstered by educating the public on air toxins / toxics and how to monitor them (e.g., curriculum development, outreach, public education), and communication of air pollution assessment results to reduce exposure, including during environmental emergencies or events where the risk of pollution exposure is high.

**Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience**

Disadvantaged communities often lack access to clean water and clean drinking water. Functional water infrastructure is essential for protecting the quality of drinking water resources as well as the safety of recreational waters communities use for subsistence fishing, swimming, and other activities everyone deserves to enjoy. Strategy 3 addresses challenges communities face in accessing clean, reliable drinking water and wastewater treatment. Projects funded under this strategy may include focused

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<sup>6</sup> [Indoor Air Quality \(IAQ\)](#).



infrastructure investments that can be completed within the three-year project period and within the funding amounts specified in this NOFO, as well as assessment and planning that will enable communities to better access tens of billions of dollars in federal water infrastructure funding from other sources such as EPA's Clean Water and Drinking Water State Revolving Funds. Targeted infrastructure projects can include identification and replacement of lead pipes in homes and public spaces, improved resilience of water systems through deployment of backup power such as onsite renewable energy and storage, targeted efficiency upgrades, septic to sewer conversions, lining waste lagoons, and investments in redundancy such as backup wells. Assessment and planning efforts could include, for example, a leak detection and pipe replacement plan, or a PFAS monitoring program that informs a funding application to one of several sources of state and federal funding.

**Strategy 4: Safe Management and Disposal of Solid and Hazardous Waste**

Disadvantaged communities are disproportionately exposed to solid and hazardous waste, which negatively impacts public health. This strategy supports pollution prevention, recycling, and disposal activities related to the management of solid and hazardous waste, such as discarded electronics, tires, single-use plastics, and other disposable items. Community-level responses to these challenges could include, for example, the purchase of equipment and the development of facilities to manage solid and hazardous waste to improve public health outcomes. Brownfields cleanup is not contemplated under this strategy and is not a Community Change Grants program priority.

**Requirement 3. Community Engagement and Collaborative Governance Plan:** Track I applications must include a Community Engagement and Collaborative Governance Plan. Successful implementation of environmental and climate justice projects requires relationships and meaningful engagement among an ecosystem of community leaders and members alongside partners across many sectors. This plan is required to help ensure that grant activities are driven and informed by the views of the Project Area community and are accomplished through collaboration among key stakeholders. The plan should describe how the applicant will engage, educate, and be responsive to community members throughout project development and / or implementation. Additionally, the plan should incorporate a Collaborative Governance Structure that demonstrates how the Lead Applicant and Collaborating Entities (as described in [Section III.A](#)) will work together to successfully implement the grant in a timely, effective, and equitable manner.

The Community Engagement and Collaborative Governance Plan cannot exceed 10 single spaced pages – excess pages will not be reviewed. It should address the following elements and any others the applicant deems relevant to their projects:

- **Past Community Outreach and Engagement Conducted:** The applicant should demonstrate what outreach and engagement methods were used to engage with the Project Area community, including any with specific neighborhoods or groups, and how this impacted the selection of the strategies and associated projects as well as the applicant's implementation approach.
- **Community Engagement Plan Implementation:** The applicant should demonstrate the specific community engagement methods, as well as how they will mitigate barriers and involve relevant governmental stakeholders, necessary to support overall implementation including:
  - **Clear Methods for Engagement and Transparency:** The applicant should describe the following elements:
    - Outreach methods that provide opportunities for broad and diverse community member involvement in project development and / or implementation and feedback during grant performance.
    - Transparent mechanisms that will promote meaningful accountability to the needs and preferences of residents in the Project Area.



- Mechanism(s) that will be used to continuously inform the community before and during project implementation on project status, benefits available to them through the project, and indicators being tracked, such as air quality improvements or trees planted.
  - **Mitigating Barriers:** The applicant should describe measures to minimize and mitigate barriers around community engagement and participation in project development and / or implementation including but not limited to those related to linguistic differences, communication challenges, disabilities, inaccessible technology, lack of trust or awareness, transportation, childcare, and elderly / adult care.<sup>7</sup>
  - **Government Involvement:** As applicable, the applicant should demonstrate the support and involvement of government agencies needed to facilitate successful grant performance. For example, projects that intersect with local-government authorities such as permitting, planning, and zoning are encouraged to demonstrate the involvement and cooperation of local government authorities.
- **Collaborative Governance Structure:** The applicant should provide details regarding the roles and responsibilities of the Lead Applicant, Collaborating Entities, and community residents and / or community-selected representatives for implementing, managing, and overseeing the application's project activities, including how they should meet regularly to discuss project implementation. The description should include at a minimum:
  - Outreach methods to solicit community representatives and processes to choose representatives to enable a broad cross-section of community representatives to participate so different voices are heard.
  - An explanation of how the Lead Applicant and Collaborating Entities will coordinate with each other and community members to inform and engage the community on project development and progress.
  - An outline of the planned decision-making processes between the Lead Applicant and Collaborating Entities, including procedures to ensure that decisions are transparent and can be made in an expedited manner when necessary.
  - Processes for replacing a Collaborating Entity to ensure that the replacement entity has comparable skills, qualifications, expertise, community support, and experience to avoid any adverse impact on grant performance. EPA approval of the qualifications, expertise, and experience of the replacement Collaborating Entity will be required pursuant to 2 CFR 200.308I(2) and / I(c)(6).

Note: Awards may include terms and conditions requiring that subaward agreements between the Lead Applicant and Collaborating Entities (including the Statutory Partner described in [Section III.A](#)) contain provisions reflecting certain of the requirements above.

**Requirement 4. Community Strength Plan:** Track I applications must include a Community Strength Plan. Advancing environmental and climate justice requires bolstering the strength and economic prosperity of a community for the benefit of local residents, while also ensuring those residents can remain within the community and benefit from the investments over the long term. [Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All](#), states, "Advancing environmental justice will require investing in and supporting culturally vibrant, sustainable, and resilient communities in which every person has safe, clean, and affordable options for housing, energy, and transportation. It is also necessary to prioritize building an equitable, inclusive, and sustainable economy that offers economic opportunities.

<sup>7</sup> Refer to the EPA Office of Grants and Debarment Guidance on Selected Items of Cost for Recipients, EPA Guidance on Participant Support Costs, and EPA Subaward Frequent Questions, including for additional information on paying for light refreshments, providing dependent care stipends or services for community meeting participants, and meeting participant transportation stipends.



Pursuing these and other objectives integral to advancing environmental justice can successfully occur only through meaningful engagement and collaboration with underserved and overburdened communities to address the adverse conditions they experience and ensure they do not face additional disproportionate burdens or underinvestment.”

In alignment with this Executive Order and to help EPA assess whether the proposed projects will benefit disadvantaged communities, as required by §138(b)(1) of the CAA, this plan should describe how the projects in the application are intended to (1) maximize the economic benefits of the projects for existing residents in the Project Area, and (2) avoid unintended consequences for existing residents in the Project Area including the displacement of residents in the Project Area.

This plan cannot exceed 5 single-spaced pages – excess pages will not be reviewed. Consistent with the above discussion, the plan should address the following elements.

### **1. Maximizing Economic Benefits of Projects:**

The plan should describe how the projects included in the application will maximize economic benefits for individuals in the Project Area, including priority populations defined in footnote 3.

Examples of economic benefits, as described below, could include (1) opportunities for local small businesses or contractors; (2) jobs for community members; (3) financial savings for residents; and other similar benefits, in alignment with EPA grant regulations and applicable law.<sup>8</sup>

- **Business Opportunities:** Applicants may need to hire contractors to carry out certain project activities. Applicants may inform local businesses of open solicitations and encourage them to compete for contracts. For example, applicants may consider partnering with their local government’s small business office to broadly advertise contracting opportunities. Similarly, applicants should make a “good faith effort” to provide disadvantaged business enterprises (DBEs) with an opportunity to compete for contracts in accordance with [EPA’s 40 CFR Part 33 Disadvantaged Business Enterprise rule](#).<sup>9</sup>
- **Job Opportunities:** Applicants may propose measures to facilitate the employment and retention of workers from disadvantaged communities on funded projects. For example, applicants may propose developing recruitment strategies in partnership with their local workforce development board; funding supportive services for workers on grant-funded projects (e.g., transportation, childcare, mental health supports), coordinating such services with local social service providers; or establishing goals for hiring individuals from disadvantaged communities on the projects and transparently tracking progress toward those goals. Applicants may propose measures to increase community awareness of these job opportunities and the associated skill requirements, such as hiring workshops or job fairs. Applicants may also describe specific measures that will ensure Project Area residents are developing skills that are necessary to take advantage of existing or future jobs in professions contributing to the reduction of GHG emissions and other air pollutants.

<sup>8</sup> Note that applicants are not bound by statutory or administrative local-preference requirements, per 2 CFR 200.319(c).

<sup>9</sup> Note: Please carefully review Section IV.d, “Contracts and Subawards,” of EPA’s Solicitation Clauses that are incorporated by reference in this NOFO in [Section 1.J](#). EPA expects recipients of funding to comply with competitive procurement contracting requirements. The Agency does not accept justifications for sole source contracts for services or products available in the commercial marketplace based on a contractor’s role in preparing an application or a firm or individual’s “unique” qualifications. For example, applicants cannot name local contractors as part of this Community Strength Plan without adhering to these competitive procurement requirements.



Note: Jobs funded under this program should be high-quality jobs, in alignment with the U.S. Department of Labor and Commerce's Good Jobs Principles, as described in Appendix E. Applicants may propose measures to increase the likelihood that these will be good jobs for individuals from disadvantaged communities, such as training for employers / contractors on grant-funded projects to promote best practices such as equal opportunity recruitment and hiring practices, good benefits, healthy organizational culture, and opportunities for advancement. Additionally, jobs for construction activities funded under this grant will be required to pay prevailing wage rates, as required by CAA § 314 and the Davis-Bacon and Related Acts.

- **Financial Savings:** Applicants may also describe how and the extent to which Project Area residents will receive direct economic benefits from the Climate Action and Pollution Reduction projects in the applications, such as through energy bill savings or affordable zero- or low-emission transportation solutions. The plan may also discuss how the applicant plans not only to deliver these benefits for residents in the short-term but also to preserve them for the long-term. As an example, applicants working on a transportation project that will deliver immediate cost savings for residents may negotiate with a vendor / contractor to lock-in long-term cost savings for community members.

Applicants may consider using tools to align stakeholders around these benefits, such as a Community Benefits Agreement (CBA), which is a legally binding contract that defines benefits. Parties to a CBA may include CBOs, neighborhood associations, local government entities, contractors and developers, and other similar project stakeholders. Applicants are reminded of the three-year period of performance for the grant and should be prepared to expeditiously begin the negotiation of community benefits to prevent project delays.

## 2. Displacement Avoidance:

Benefits to disadvantaged communities can be evaluated by whether residents are able to retain the benefits of EPA-funded projects over the short and long-term. While climate action and pollution reduction can have a positive impact on a community, those benefits can also lead to unintended consequences, such as increased costs of living in a Project Area. Given that the purpose of CAA §138 is to fund activities that will benefit disadvantaged communities, applicants should describe measures to increase the likelihood that existing community members of the Project Area will benefit from investments in both the immediate and long term.

Applicants should discuss potential short-term and long-term risks associated with the proposed projects to residents, small businesses, nonprofits, and other community members in the Project Area. Applicants should assess and describe the community's vulnerability to rising costs attributable to the proposed projects and assess potential impacts to households, small businesses, and other existing groups. Based on the specific risks identified, applicants should describe measures for mitigating those risks as applicable. Some measures can mitigate these displacement vulnerabilities in the short-term, whereas other measures can have long-term impacts. For example, for projects that increase the energy efficiency of multi-family housing facilities, and that may have the unintended effect of raising rents for those facilities, the approach may focus on outreach / education to residents, such as information packets, tenant protection workshops that feature information about tenant rights under applicable state and local laws, or other educational activities. Other approaches may focus on securing commitments from landlords benefiting from EPA-funded property improvements to extend affordable housing covenants or agree not to raise rents

unnecessarily.<sup>10</sup> Applicants can also describe how they will work with relevant entities, such as local governments, to create policies, plans, or programs to mitigate unintended impacts of the EPA-funded investments.

Applicants should describe any work already underway in the Project Area that would mitigate these risks, or existing policies, ordinances, or programs that are relevant. For example, an applicant could describe any ordinances in the Project Area designed to expedite construction or availability of additional affordable housing. Applicants can also describe any Climate Action and Pollution Reduction Strategies proposed as part of this application that might help mitigate displacement risks by providing project co-benefits. For example, a strategy that promotes increased housing density as a tool to reduce emissions could have the co-benefit of reducing housing costs by increasing housing supply.

**Requirement 5. Readiness Approach:** Given the statutory requirement that all Community Change Grants must be completed within three years, applicants must describe their approach for initiating grant performance upon award, or generally within 120 days after award, in compliance with the requirements in 2 CFR Parts 200 and 1500, 40 CFR Part 33 that apply to all EPA grants so they can successfully complete the grant within the three-year period.

This includes addressing the readiness considerations listed below, and any others, that are applicable to the projects and how they will be met. If any of the below considerations are not applicable, the application should explain why not.

- **Government Approvals:** If government approval at any level (e.g., construction permits) is necessary to implement or perform a project, the applicant must demonstrate that they have obtained such approval. If such approval has not been obtained, then the applicant must demonstrate how they will obtain it immediately after award, so it does not impede grant implementation.
- **Federal Requirements for Construction Projects:** Applicants must demonstrate that they have systems in place, or a plan to have such systems in place immediately after the grant award, to comply with CAA § 314 and the Davis-Bacon and Related Acts prevailing wage requirement, the Build America Buy America domestic preference requirement, and other cross-cutting statutory and Executive Order requirements that apply to Federally funded construction projects.
- **Alignment with Existing Plans:** Applicants must demonstrate that the project(s) in the Project Area as defined in Appendix A are consistent with any community development, climate resilience, or hazard mitigation plans, or other comparable government land use restrictions.
- **Site Control:** Applicants must demonstrate that they own or control the site where a project will be performed or that they will have legally binding access or permission to the site so they can perform the project(s).
- **Operations and Maintenance:** Applicants must describe their operations and maintenance plan and financing approach for their project's infrastructure investments, if relevant, which may include long-term service costs, fee structures, detailed indebtedness for all properties, and other relevant information demonstrating how operations and maintenance of the investment will be assured during and after the grant award.

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<sup>10</sup> Note that any agreements must be in alignment with local and state housing laws. For example, in some instances, state or local law may allow a landlord to raise rents to compensate for increases in property taxes attributable to the value of EPA funded improvements.



**Requirement 6. Compliance Plan:** Applicants must submit a Compliance Plan that describes how they will: (i) ensure compliance with the grant's terms and conditions, including 2 CFR § 200.302(b) (financial management), 2 CFR § 200.303 (internal controls), and 2 CFR § 200.332 (requirements for pass-through entities); and (ii) manage broader legal and compliance risks.

## H. Funding Track II: Meaningful Engagement for Equitable Governance

Under this track, eligible applicants may submit projects, as described in CAA § 138(b)(2)(E), for "facilitating engagement of disadvantaged communities in State and Federal advisory groups, workshops, rulemakings, and other public processes." EPA has interpreted "other public processes" as encompassing local, Tribal, and other governmental processes. All funded activities under this NOFO must comply with federal, state, and local laws and regulations, including but not limited to:

1. 2 CFR 200.435(b), which restricts the use of grant funds to defend a recipient that is subject to a criminal, civil or administrative proceeding against it commenced by any government for fraud or similar offenses;
2. 2 CFR 200.435(g), which precludes the use of grant funds to prosecute claims against the federal Government; and
3. 2 CFR 200.450(c), which restricts the use of federal funds by nonprofit organizations for certain lobbying or electioneering activities but does not preclude the use of federal funds to promote adoption of local ordinances, including those related to zoning.
4. 40 CFR Parts 5 and 7, which prohibit discrimination on the basis of race, color, national origin (including limited-English proficiency), disability, sex, and age by recipients and subrecipients of federal financial assistance.

### **Track II Objectives**

Section 138 of the CAA provides that grants may be awarded for the purpose of "facilitating engagement of disadvantaged communities in State and Federal advisory groups, workshops, rulemakings, and other public processes." Accordingly, Track II applications intend to build the capacity of communities and governments to evaluate and redress environmental and climate injustices by giving disadvantaged communities a meaningful voice in government decision-making processes. By supporting direct participation of disadvantaged communities in the development and implementation of solutions, policies, and programs, the Community Change Grants can help close equity gaps and redress environmental and climate injustices.

Track II applications should focus on breaking down systemic barriers to community participation in government processes impacting environmental and climate justice. This can be done by creating engagement and feedback mechanisms with two-way communications between community members and government decision-makers. Applications should focus on ways to provide disadvantaged communities with information about issues that directly impact them, while simultaneously creating mechanisms for the government to gather input to ensure community needs inform decision-making and are integrated into government processes and policies. Applications in this track should strive to enable communities to play a meaningful role in making and implementing decisions.

Effective projects should also involve partnerships between community organizations, governments, philanthropic organizations, the private sector, and / or third-party facilitators and evaluators who can support collaboration across sectors to facilitate the engagement of disadvantaged communities in governmental decision-making processes.



## **Track II Project Examples**

The following are examples of activities that may be proposed under Track II. Applicants may expand or refine these examples or submit projects that are not listed below if they demonstrate how they will facilitate the engagement of disadvantaged communities in governmental processes.

### **Example 1. Educational and Training Programs**

These projects prepare, train, and educate members of disadvantaged communities on how to engage in government processes related to environmental and climate justice activities.

Examples of activities that could be performed under this type of project include but are not limited to:

- Creating a leadership development program that trains community members to identify environmental and climate justice challenges, devise strategies to address them, and recommend actions to governmental authorities. Example topics could include how to review public sector budgets, navigate specific processes such as land-use ordinances or National Environmental Policy Act (NEPA) reviews, and participate effectively in public meetings. The [EPA EJ Academy](#) is an example of a type of project applicants may consider developing for their own community.
- Designing and implementing a training program to help members of disadvantaged communities effectively participate in advisory boards, commissions, land use authorities, or other bodies that involve community members in environmental and climate related policy making.
- Partnering with a government to develop and / or implement Equity Action Plans that identify and address barriers to equity and opportunity and discrimination that disadvantaged communities may face. Equity Action Plans should meaningfully incorporate community input and result in city-or-statewide transformational, equitable change in environmental or climate related policies. For informational purposes only, please find [here](#) a link to Equity Action Plans developed by federal agencies that may help applicants with designing and preparing these types of projects.

### **Example 2. Environmental Advisory Boards (EABs)**

These are projects that facilitate the engagement of disadvantaged communities in environmental decision-making by establishing advisory councils, taskforces, or similar bodies to engage with government. These boards should have regular meetings to create consistent opportunities for disadvantaged communities to provide recommendations on actions government entities should take to address environmental and climate justice challenges. These bodies should include members from disadvantaged communities, may include additional representatives from other stakeholder groups that can effectively represent important and related perspectives (including Tribal, academia, youth / elderly / disability populations, government, etc.).

Examples of activities under an EAB-type project may include but are not limited to facilitating the engagement and involvement of disadvantaged communities in governmental processes at different levels of government to provide input, recommendations, and advice on matters such as:

- Permitting decisions for factories or industrial sites.
- Community infrastructure upgrades to address pollution and climate concerns.
- Zoning and siting guidance for fence-line / frontline communities<sup>11</sup> such as new school placements, highway construction, and industrial and commercial uses of land.

<sup>11</sup> A fence-line community or frontline community is generally one immediately adjacent to high polluting facilities such as industrial parks, manufacturing facilities, or commercial facilities and is directly affected by the noise, odors, traffic, and chemical and pollution emissions of the operations of these entities.

- Issues and actions of municipal and public utilities related to workforce development, drinking water shutoffs, drinking water quality and affordability, and aging wastewater treatment infrastructure in / near disadvantaged communities.

### **Example 3. Collaborative Governance Activities**

These are projects that facilitate the process of providing recommendations and implementing decisions that will benefit disadvantaged communities. Projects can focus on creating collaborative bodies with members from and / or representing the interests of disadvantaged communities, governmental entities, and other stakeholders to work on environmental and climate justice issues.

Functions these bodies may focus on include co-producing solutions with disadvantaged communities to identify and address environmental issues. This could be done through obtaining feedback from a wide range of experts and stakeholders, including but not limited to those working in public health, housing, economic development, environmental justice, and other relevant fields, to identify environmental and directly related public health issues, develop solutions, and then work towards implementing the ideas with the necessary parties.

Examples of activities under a collaborative governance project may include but are not limited to facilitating the engagement and involvement of disadvantaged communities in governmental processes on matters such as:

- Participating in the development of one or more community benefits agreements to help ensure that environmental projects funded by federal, state, and / or private entities meaningfully engage and account for community needs. For informational purposes only, the resource [here](#) from the Department of Energy provides information that may help applicants with designing and preparing these types of projects.
- Creating a governance body or “development community” for a brownfields post-cleanup redevelopment project.<sup>12</sup>
- Creating a source water protection plan to protect public health and reduce burdens on water systems.
- Recommending organizational changes to government entities that make them more receptive and sensitive to the environmental and climate justice concerns of disadvantaged communities.

### **Example 4. Participation in Governmental Funding and Budgeting Processes**

These are projects that use participatory budgeting to inform public spending on environmental priorities. Participatory budgeting is an approach to making decisions about governmental spending that is focused on meaningfully and deeply engaging the community in governmental funding processes. Projects can enable community-based organizations to partner with a public entity to design and implement processes whereby members of disadvantaged communities have input into, and influence, decisions about how to allocate public budgets for environmental and climate justice priorities. An example of a project using participatory budgeting could involve designing a program where the community identifies problems, evaluates proposals, and recommends decisions for public funding of projects that implicate environmental and climate justice issues.

<sup>12</sup> U.S. Department of Health & Human Services. [Build a Development Community](#).



## I. EPA Strategic Plan Linkage, Anticipated Outputs, Outcomes & Performance Measures

### 1. Strategic Plan Linkage

Awards made under this NOFO will support the following goals and objectives of the FY 2022-2026 EPA Strategic Plan. Applications must explain how their projects will further these goals and objectives.

Goal 2: Take Decisive Action to Advance Environmental Justice and Civil Rights

- Objective 2.1: Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, and Local Levels which includes the strategy of Building Community Capacity and Climate Resilience and Maximizing Benefits to Overburdened and Underserved Communities: EPA will increase support for community-led action by providing unprecedented investments and benefits directly to communities with environmental justice concerns and by integrating equity throughout Agency programs.

Depending on the projects included in them, awards will also support and advance the following EPA Strategic Plan Goals as applicable:

- Goal 1: Tackle the Climate Crisis
- Goal 4: Ensure Clean and Healthy Air for All Communities
- Goal 5: Ensure Clean and Safe Water for All Communities
- Goal 6: Safeguard and Revitalize Communities; and
- Goal 7: Ensure Safety of Chemicals for People and the Environment.

### 2. Environmental Results: Outputs and Outcomes

Pursuant to EPA Order 5700.7A1, Environmental Results under Assistance Agreements, applicants must describe the environmental outputs and outcomes to be achieved under the award. Applicants should specifically describe the environmental results of the proposed project in terms of well-defined outputs and, to the maximum extent practicable, well-defined outcomes that will demonstrate how the project will contribute to the goals and objectives of the Community Change Grants program.

The following questions may be useful to consider when developing output and outcome measures of quantitative and qualitative results:

- What measurable short- and longer-term results will the grant achieve?
- How will the Lead Applicant and Collaborating Entities measure progress in achieving the expected results (including outputs and outcomes), and how will the approach to measuring progress use resources effectively and efficiently?
- Are the projected outputs and outcomes specific and detailed? Are specific target measures included where possible? Are target measures reasonable and achievable within the project period and for the funding amount?

See Appendix F for further details on expected outputs and outcomes from Track I and II awards.

### 3. Performance Measurement Plan

The evaluation component of the Community Change Grants is essential. In their Performance Measurement Plan, applicants should describe how they plan to track and measure their project



implementation and progress towards achieving the expected outputs and outcomes, including those identified in Appendix F, throughout the performance period.

Generally, higher quality performance measurement plans include specific target metrics for both outputs and outcomes. The applicant's performance measurement plan should help gather insights, will be a mechanism to track progress toward output and outcome objectives, and may provide the basis for developing lessons learned to inform future funding recipients.

Applicants should incorporate program evaluation activities from the outset of their program design and implementation to meaningfully document and measure their progress towards meeting project goals. Applications may include funding in the budget for personnel with expertise in planning, designing, developing, implementing, and evaluating programs.

#### J. Additional Provisions for Applicants Incorporated into the NOFO

Additional provisions that apply to Sections III, IV, V, and VI of this NOFO and / or awards made under this NOFO can be found at [EPA Solicitation Clauses](#). These provisions are important for applying to this NOFO, and applicants must review them when preparing applications for this NOFO. If you are unable to access these provisions electronically at the website above, please email [CCGP@epa.gov](mailto:CCGP@epa.gov) to obtain the provisions.

## Section II. Federal Award Information

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### A. Number and Amount of Awards

EPA anticipates awarding approximately \$2 billion in funding through this NOFO depending on funding availability, quality of applications received, EPA priorities, and other applicable considerations. Awards under Track I are expected to be between \$10-20 million each and cannot exceed \$20 million. Awards under Track II are expected to be between \$1-3 million each and cannot exceed \$3 million. EPA expects to award approximately \$1.96 billion for about 150 Track I awards, including those under the Target Investment Areas described below in B, and approximately \$40 million for about 20 Track II awards. These amounts are estimates only, and EPA reserves the right to increase or decrease the total number of awards and funding amounts for each Track contingent on the quality of applications received, the amount of funds awarded to selected applicants, budget availability, and / or agency priorities and programmatic considerations. In addition, given that workforce development programs as described in [Section I.G](#) can be significant to achieving environmental and climate justice in many communities, EPA anticipates making a minimum of fifteen awards for high-ranking applications that include a workforce training program(s) as further described in [Section V.E](#).

### B. Target Investment Areas (TIA) for Track I Applications

Out of the \$2 billion in funding, EPA has identified five Target Investment Areas (TIA) listed below to help ensure that communities with unique circumstances, geography, and needs can equitably compete for funding. The amounts are estimates only and subject to change based on the number and quality of applications received, funding considerations, and agency priorities. Applicants interested in submitting an application for projects benefitting a TIA must identify this in their application. Consistent with the Track I evaluation process described in [Section V](#), applications for these areas will be evaluated against each other (for example, applicants for TIA C will be evaluated against other applicants for TIA C). Applications for the TIAs must address the Track I application requirements identified in [Section I.G](#).

- TIA A: Tribes in Alaska: an estimated \$150 million for projects benefitting Indian Tribes in Alaska.
- TIA B: Tribes in the Continental United States and Hawaii: an estimated \$300 million for projects benefitting Tribal communities outside Alaska. This also includes projects benefitting Tribal communities that are in the Border Area identified below in E.
- TIA C: Territories: an estimated \$50 million for projects benefitting disadvantaged communities in the United States' territories of Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands.
- TIA D: Disadvantaged Unincorporated Communities: an estimated \$50 million for projects benefitting disadvantaged unincorporated communities as defined in Appendix A.
- TIA E: United States (U.S). – Southern Border Communities: Consistent with EPA's longstanding approach to addressing transborder climate and pollution challenges, an estimated \$100 million for projects benefitting non-Tribal disadvantaged communities within 100 kilometers north of the U.S.-Mexico border.

#### **Special Requirements for Cross-Border Projects to Benefit U.S. Disadvantaged Communities**

EPA's strong preference is that the work for all projects to be performed under the awards made through this NOFO will be performed entirely within the United States. However, in limited circumstances, projects to benefit U.S. disadvantaged communities near an international border may require some international work to be performed within 100 kilometers of that border (e.g., within 100 km south of the U.S.-Mexico



border for a TIA E application, or within 100 km north of the U.S.-Canada border for any application). In those limited cases, to be eligible for funding consideration, the applicant must demonstrate in their application that:

- The project(s) will directly and predominantly benefit disadvantaged communities in the U.S., for example by monitoring and / or preventing pollution from an international source that is impacting the disadvantaged community in the U.S.
- Any work outside of the U.S. is necessary for the project(s) to be successful in benefitting the disadvantaged communities in the U.S. — e.g., the project(s) will not be effective otherwise.
- Any work outside of the U.S. will not be a substantial part of the project.
- The applicant will ensure that any work outside of the U.S. will be timely and properly completed and monitored to ensure it is effectively performed.

Failure to address how the application meets these conditions will render the application ineligible for review as stated in Section III.D. Applications involving cross-border work that are selected for award must address any cross-border work issues (e.g., site access and control) during the workplan negotiations following selection and before award. The appropriate terms and conditions will be included in the grant. Projects benefitting Project Areas along the U.S.-Mexico Border should be consistent with guidance and best practices outlined by EPA's Border Program.<sup>13 14</sup>

### C. Rolling Application Submittal and Review Process, Application Award Limits, and Application Resubmission Procedures

1. Applications may be submitted under this NOFO through November 21, 2024, to provide applicants, to the maximum extent practicable, flexibility on when to submit an application. Applications will be reviewed and evaluated on a rolling basis as described in [Section V](#) to facilitate and expedite the review and award process. EPA cannot guarantee that funding will be available through the end of the NOFO 12-month application period as funding availability is dependent on the volume and quality of applications received, as well as other applicable programmatic and funding considerations. As such, it is possible that funding could be exhausted before the conclusion of the 12-month rolling application period.
2. Under this NOFO, Lead Applicants, as defined in [Section III.A](#), may submit a maximum of two applications and receive up to two awards if they demonstrate their capacity and capabilities to effectively perform, manage, oversee, and complete both awards within the three-year grant period of performance. The two applications may be either two Track I applications or two Track II applications, or one of each. Lead Applicants who submit more than two total applications will be asked to withdraw the excess one (s). EPA will not review more than two applications from any one Lead Applicant.
3. Lead Applicants whose initial eligible application(s) is not selected for funding may, after timely requesting and receiving a debriefing on the application (as described in the Section VI Debriefings and Disputes clauses included in the [EPA Solicitation Clauses](#)), resubmit a revised application one additional time while the NOFO remains open. For example, if a Lead Applicant submits two eligible applications and both are not initially selected for funding, they may resubmit each application one additional time within the 12-month NOFO open period as explained above and further below. There is no guarantee that resubmissions, even after a debriefing, will be selected

<sup>13</sup> [United States – Mexico Environmental Program.](#)

<sup>14</sup> [U.S.-Mexico Border Program – Borderwide Resources.](#)

for funding. In addition, applicants who submit applications towards the end of the 12-month rolling period may not have an opportunity to resubmit the application because the NOFO is expected to close for applications on November 21, 2024. While EPA intends to review applications and provide debriefings as expeditiously as possible, applicants should keep this in mind when determining the timing of their application submission to ensure there is sufficient time for a resubmission.

4. The resubmitted application must be clearly identified as a resubmission of a previously submitted application by providing the date of the original submission through [www.grants.gov](http://www.grants.gov) and / or the date of the EPA debriefing in the updated application package. The resubmission should take into consideration the feedback received during a debriefing and any other relevant considerations, and it cannot be a completely different application from the one initially submitted. If EPA determines, in its sole discretion, that it is a different application bearing little resemblance to the original application, it may be rejected and not reviewed.

#### D. Conditional Awards

EPA may make conditional awards under this NOFO, which will be subject to applicable terms and conditions in the grant award.

#### E. Period of Performance

The period of performance of every grant funded under this NOFO cannot by statute exceed three years. There can be no extensions. Projects must be designed to be successfully and effectively completed within three years. EPA anticipates that the first awards under this NOFO will be made in the late Spring of 2024 and will continue to be made on a rolling basis until funding is exhausted. EPA cannot predict when funding will be exhausted since it is dependent on the volume and quality of applications received, as well as other applicable programmatic and funding considerations. As such, it is possible that funding could be exhausted before the 12-month rolling application period is over.

#### F. Partial Funding

EPA reserves the right to partially fund applications by funding discrete portions or phases of applications. If EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application, or portion thereof, was evaluated and selected for award, and therefore maintains the integrity of the competition and selection process. **To facilitate consideration of an application for partial funding, if applicable, EPA recommends that applications separate costs for the proposed grant in the program budget by project category, to the extent practicable.**

#### G. Additional Awards

EPA reserves the right to make additional awards under this NOFO, consistent with EPA policy and guidance, if additional funding becomes available after all the selections are made under this NOFO. For this NOFO, this only applies to making additional awards for those applications considered during the final monthly review, described in [Section V](#). Any additional selections for awards will be made no later than 6 months after the final monthly review.



## H. Funding Type

EPA anticipates awarding cooperative agreements under this NOFO because it is expected that there will be substantial Federal involvement through the EPA Project Officer with selected applicants in the performance of the grant and for effective EPA oversight of grantee performance. Although EPA will negotiate precise terms and conditions relating to substantial federal involvement as part of the award process with each grantee awarded a cooperative agreement, the anticipated substantial federal involvement may include:

- Closely monitoring the grantee's performance to verify the results reported by the applicant;
- Reviewing proposed procurement, in accordance with the Procurement Standards in 2 CFR Parts 200 and 1500;
- Reviewing evidence of completion of project phases (e.g., planning) before providing approval for the grantee to begin work on the next project phase (e.g., implementation);
- Reviewing the substantive terms of contracts, subawards, or other financial transactions (EPA will not select contractors, subrecipients, or program beneficiaries);
- Approving qualifications of key personnel (EPA will not select employees or contractors employed by the grantee);
- Reviewing and commenting on reports prepared under the cooperative agreement (the final decision on the content of reports will rest with the grantee); and
- Addressing compliance with Build America, Buy America requirements, in accordance with 2 CFR § 184, and providing technical assistance, if necessary, on compliance with CAA § 314 and the Davis-Bacon and Related Acts.

In addition, there may be Federal involvement with selected applicants in the performance of the grant, which may include co-sponsoring community meetings and other events and collaborating during performance of the scope of work.

## Section III. Eligibility Information

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Note: Additional provisions that apply to this section of the NOFO can be found in the EPA Solicitation Clauses.

### A. Eligible Applicants

Consistent with CAA §138(b)(3) and Assistance Listing 66.616, applicants eligible to apply and receive grants under this NOFO are (1) a partnership between two community-based nonprofit organizations (CBOs) as defined below, or (2) a partnership between a CBO and one of the following: a federally recognized Tribe, a local government, or an institution of higher education. These types of partnerships for eligibility purposes are known as Statutory Partnerships. Further eligibility requirements are described below.

#### **1. Community-Based Non-Profit Organization (CBO)**

To qualify as a CBO for eligibility purposes, an organization must demonstrate that they are a “nonprofit organization” as defined at 2 CFR 200.1, which “means any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest and is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization.”

Applicants must include documentation in their application demonstrating that they are a nonprofit organization by one of two ways: 1) a written determination by the Internal Revenue Service that they are exempt from taxation under Section 501 of the Internal Revenue Code, or 2) based on a written determination by the state, territory, commonwealth, Tribe, or other United States governmental entity in which they are located. This can be done, for example, by submitting a letter, certificate, or articles of incorporation from the state where the organization is located that recognizes them as a nonprofit organization. Nonprofit organizations described in Section 501(c)(4) of the Internal Revenue Code that engage in lobbying activities as defined in Section 3 of the Lobbying Disclosure Act of 1995 are not eligible to apply. Foreign non-profit organizations cannot qualify as a CBO for eligibility purposes.

In addition to being considered a nonprofit organization, an organization must demonstrate that they are a public or private nonprofit organization that supports and / or represents a community and/or certain populations within a community through engagement, education, and other related services provided to individual community residents and community stakeholders. A “community,” for these purposes, can be characterized by a particular geographic area and / or by the relationships among members with similar interests and can be characterized as part of a local, regional, or national community where organizations are focused on the needs of urban, rural, and / or Tribal areas, farmworkers, displaced workers, children with high levels of lead, people with asthma, subsistence fishers, and other similar groups. For purposes of this NOFO, the CBO must have a geographic presence or connection in, or relationship with, the specified community that the projects are intended to benefit. For example, national or statewide CBOs must demonstrate the CBO’s connection to the community that will benefit from the grants.

For the purposes of this NOFO, applicants that demonstrate that they are Alaska Native Nonprofit Organizations or Alaska Native Nonprofit Associations are considered CBOs. In addition, Inter-Tribal Consortia may be able to qualify as CBOs if they meet the above requirements. The for-profit Alaskan Native Corporations are not eligible under the CBO definition and therefore are unable to apply as CBOs.



## **2. Local Government (in partnership with a CBO)**

The following units of government within a state, as defined by the regulations in [2 CFR 200.1](#), are eligible to enter a Statutory Partnership with a CBO:

- County
- Borough
- Municipality
- City
- Town
- Township
- Parish
- Local public authority, including any public housing agency under the United States Housing Act of 1937
- Special district
- School district
- Intrastate district
- Council of governments, whether incorporated as a nonprofit corporation under State law; and
- Any other agency or instrumentality of a multi-, regional, or intra-State or local government.

## **3. Federally Recognized Tribe (in partnership with a CBO)**

For the purposes of eligibility for entering into a Statutory Partnership with a CBO, EPA uses the definition of "Indian Tribe" in §302(r) of the CAA which provides that the term "...means any Indian Tribe, band, nation, or other organized group or community, including any Alaska Native village, which is Federally recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians." Note that this definition does not include Alaskan Native Corporations or State-recognized Tribes.

## **4. Institutions of Higher Education (in partnership with a CBO)**

For the purposes of eligibility for entering into a Statutory Partnership with a CBO, the grant regulations at [2 CFR 200.1](#) state that Institutions of Higher Education (IHEs) are defined at [20 U.S.C. § 1001](#).

EPA also recognizes that it is important to engage all available minds to address the environmental and climate justice challenges the nation faces. Accordingly, EPA encourages Minority Serving Institutions (MSIs) to participate in the grants under this NOFO, including by partnering with a CBO.

For purposes of this NOFO, the following are considered MSIs:

1. Historically Black Colleges and Universities, as defined by the Higher Education Act (20 U.S.C. § 1061(2)). A list of these schools can be found at [Historically Black Colleges and Universities](#).
2. Tribal Colleges and Universities (TCUs), as defined by the Higher Education Act (20 U.S.C. § 1059c(b)(3) and (d)(1)). A list of these schools can be found at [American Indian Tribally Controlled Colleges and Universities](#).
3. Hispanic-Serving Institutions (HSIs), as defined by the Higher Education Act (20 U.S.C. § 1101a(a)(5)). A list of these schools can be found at [Hispanic-Serving Institutions](#).
4. Asian American and Native American Pacific Islander-Serving Institutions; (AANAPISIs), as defined by the Higher Education Act (20 U.S.C. § 1059g(b)(2)). A list of these schools can be found at [Asian American and Native American Pacific Islander-Serving Institutions](#).

5. Predominantly Black Institutions (PBIs), as defined by the Higher Education Act of 2008, 20 U.S.C. § 1059e(b)(6). A list of these schools can be found at [Predominantly Black Institutions](#).

## B. Statutory Partnership Requirements and Collaborating Entities

The Statutory Partnership application is comprised of a Lead Applicant (an eligible CBO, Federally recognized Tribe, local government, or institution of higher education) who enters into a Partnership Agreement with a Statutory Partner (which is another eligible entity – a CBO, Federally recognized Tribe, local government, or institution of higher education) to carry out the grant activities if the application is selected for funding. If the application is selected for award, the Lead Applicant will enter into a subaward with the Statutory Partner that must contain the elements of the Partnership Agreement in Appendix B. The Lead Applicant must include a copy of a written and signed Partnership Agreement with their application to be eligible for funding consideration.

To ensure effective grant performance to meet the objectives of the Community Change Grants outlined in [Section I](#), subawards from the Lead Applicant to other entities to implement and perform specific grant project activities identified in the application will be necessary. These other entities, including the Statutory Partners, are collectively referred to as Collaborating Entities in the NOFO. Given the community centered focus of the Community Change Grants, applications that do not include Collaborating Entities will likely not score well during the evaluation process. Collaborating Entities may include Statutory Partners (CBOs, Federally-recognized Tribes, local governments, and institutions of higher education) and entities that cannot legally be Statutory Partners (e.g., states, territorial governments, and international organizations). However, for-profit firms and individual consultants or other commercial service providers cannot be Collaborating Entities. Subawards made by the Lead Applicant and Collaborating Entities to implement the project strategies and activities under the application must be made consistent with the grant regulations at [2 CFR 200.331](#) and as permitted in [Appendix A of the EPA Subaward Policy](#).

If selected for award, the Lead Applicant will become the grantee, operating as a pass-through entity for purposes of 2 CFR Part 200 and the [EPA Subaward Policy](#), and taking responsibility for making subawards to Collaborating Entities. The Lead Applicant will also be accountable to EPA for effectively carrying out the full scope of work and the proper financial management of the grant (including the subawards it makes under the grant, and contracts to consultants and procurement contractors selected in accordance with the competitive procurement requirements in 2 CFR Parts 200 and 1500 as well as EPA's 40 CFR Part 33 Disadvantaged Business Enterprise rule). Additionally, as provided in 2 CFR § 200.332, the Collaborating Entities, and other subrecipients, will be accountable to the Lead Applicant for proper use of EPA funding. Note that pursuant to 2 CFR § 200.332(a)(2), as implemented in Items 2 and 4 of EPA's *Establishing and Managing Subawards General Term and Condition*, successful Lead Applicants in the Statutory Partnership must ensure that the terms and conditions of the grant agreement "flow down" to all subrecipients in the subawards. EPA has developed an optional template for subaward agreements, available in [Appendix D of the EPA Subaward Policy](#).

As noted above, Collaborating Entities cannot include for-profit procurement contractors or individual consultants who may be involved in project performance but who receive procurement awards made in compliance with the competitive procurement requirements in 2 CFR Parts 200 and 1500 and 40 CFR Part 33. Further information on procurement and distinguishing between subawards and procurement transactions can be found in the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) and in [EPA Subaward Policy](#).



### C. Cost-Sharing or Matching Funds

No cost-sharing or matching is required as a condition of eligibility under this NOFO.

### D. Threshold Eligibility Criteria

Applications must meet the threshold eligibility criteria below to be considered for funding. **Applications that do not meet all the applicable threshold eligibility criteria will be deemed ineligible for funding consideration and will not be considered further.** If necessary, EPA may contact applicants to clarify issues relating to threshold eligibility criteria compliance prior to making an eligibility determination. In addition, applicants should contact EPA with any questions about the threshold eligibility criteria prior to submission of their applications. Applicants whose applications are deemed ineligible for funding consideration because of the threshold eligibility review will be notified within 15 calendar days of the ineligibility determination.

Applications must meet the following threshold eligibility criteria to be considered eligible for funding under this NOFO:

1. Applications must comply with the content and submission requirements listed below.
  - Applications must substantially comply with the application submission instructions and requirements set forth in [Section IV](#) of this NOFO or else they will be rejected. However, where a page limit is expressed in [Section IV](#) with respect to the application, or parts thereof, pages in excess of the page limitation will not be reviewed. Applicants are advised that readability is of paramount importance and should take precedence in application format, including selecting a legible font type and size for use in the application.
  - In addition, initial applications must be submitted through Grants.gov as stated in [Section IV](#) of this NOFO (except in the limited circumstances where another mode of submission is specifically allowed for as explained in [Section IV](#)) on or before the application submission deadline published in [Section IV](#) of this NOFO. Applicants are responsible for following the submission instructions in [Section IV](#) of this NOFO to ensure that their application is timely submitted. Please note that applicants experiencing technical issues with submitting through Grants.gov should follow the instructions provided in [Section IV](#), which include both the requirement to contact Grants.gov and email a full application to EPA prior to the deadline.
  - Applications submitted outside of Grants.gov will be deemed ineligible without further consideration unless the applicant can clearly demonstrate that it was due to EPA mishandling or technical problems associated with Grants.gov or SAM.gov. An applicant's failure to timely submit their application through Grants.gov because they did not timely or properly register in SAM.gov or Grants.gov will not be considered an acceptable reason to consider a submission outside of Grants.gov.

DO NOT WAIT! Register in SAM.gov or Grants.gov as soon as possible. Finalizing these registrations could take a month or more. You do not want a late registration to prevent you from being able to properly submit your application through [Grants.gov](#).

2. All applicants must meet the eligibility and statutory partnership requirements in III.A and include a Partnership Agreement (See Appendix B) with the application.
3. All applications must demonstrate, as required by CAA § 138(b)(1), that the projects will benefit disadvantaged communities as defined in Appendix A. While projects may have an incidental

benefit to census block groups or other areas that are not considered disadvantaged communities, the applicant must demonstrate how all the projects in the application will primarily benefit disadvantaged communities in the Project Area as defined in Appendix A.

4. Track I applications proposing to serve a geographically-defined community identified as disadvantaged in Appendix A must submit a Project Area Map that defines which specific disadvantaged community the projects and supporting activities will directly benefit.
5. Given the requirement under CAA § 138(b)(1) that all grants must be completed within three years, all applications must describe how the projects in the application, including any construction projects, can be completed within three years of award.
6. All Track I applications must include projects under at least one [Climate Action Strategy](#) and at least one [Pollution Reduction Strategy](#) as described in [Section I.G.](#) Track I applications also must include a [Community Engagement and Collaborative Governance Plan](#), [Community Strength Plan](#), [Readiness Approach](#), and [Compliance Plan](#) as described in [Section I.G.](#)
7. All Track I applications including a workforce development project under the Climate Action Strategy must demonstrate how it will help reduce air pollutants and GHG emissions.
8. All Track I applications for projects under [Climate Action Strategy 6: Brownfield Redevelopment](#), must be performed on sites where cleanup is complete or where the site does not require any cleanup activities for the intended use or reuse of the site, as well as meet the requirements stated in Appendix C for Brownfields Redevelopment projects.
9. All Track I applications for Pollution Reduction activities to increase monitoring capabilities or raise community awareness of pollution must also include an associated remediation, implementation, or infrastructure pollution reduction project that addresses the identified pollution issue.
10. Track I applications cannot request more than \$20 million in EPA funding and Track II applications cannot request more than \$3 million in EPA funding. Applications requesting more than these amounts will be rejected. If necessary, EPA will clarify any questions about the funding amounts requested prior to application review.
11. A Track I application for a TIA defined in [Section II.B](#) can only address one TIA. An application cannot address more than one TIA.
12. Track I applications submitted for TIA A benefitting Alaskan Tribal lands that include a project(s) for the assessment and cleanup of sites covered by the Contaminated ANCSA Lands Assistance Program must meet the relevant requirements specified in Appendix H.
13. Applications submitted for TIA E for U.S.-Southern Border Communities projects, as well as any including projects that may include project activities within 100 km of a U.S. border as discussed in [Section II.B](#), must meet the special requirements identified in [Section II.B](#).
14. Written applications must be submitted in English only. Applications written in languages other than English will not be reviewed or considered for award. If you need assistance to submit the written application in English, technical assistance may be available. Please refer to [Section I.E](#).



15. Multiple Applications. Lead Applicants may submit no more than two applications under this NOFO, and receive no more than two awards, as explained in [Section II](#). Excess applications will not be reviewed. If a Lead Applicant submits more than two applications, they will be contacted by EPA to determine which one(s) to withdraw. Notwithstanding this limitation, a Lead Applicant may be a Statutory Partner or Collaborating Entity on other applications.
16. Resubmissions. As stated in [Section II.C](#), a resubmitted application must be clearly identified as a resubmission of a previously submitted eligible application through such means as providing the date of the original submission and / or date of the EPA debriefing. It cannot be a completely different application from the one originally submitted. If EPA determines, in its sole discretion, that it is a completely different application bearing little resemblance to the original application, it may be rejected and not reviewed.
17. EPA will not consider any application that includes projects that are exclusively designed to conduct scientific research. However, applications may include research components such as building blocks for outreach, training, and program implementation projects. In such cases, applications should clearly articulate this link, explain why the research is necessary for the project's success, and ensure that such research does not already exist.
18. EPA will not consider any application requesting funding for assessment, removal, or remediation of Superfund sites.

Note: If an application is submitted that includes any ineligible projects, tasks, or activities, including but not limited to ones that EPA determines cannot be funded under the statutory / regulatory authorities for the grant, that portion of the application will be ineligible for funding and may, depending on the extent to which it affects the application, render the entire application ineligible for funding. This includes but is not limited to projects requesting funding for relocation activities as described in [Section I.F](#).

Applicants who have any questions about whether their project can be funded under the statutory / regulatory authorities for the grants and this NOFO, or whether certain costs related to the project are allowable costs, should clarify the issue with EPA prior to submitting their application. Failure to do so may result in the projects and / or costs being ineligible for funding and may impact the eligibility of the entire application.

## Section IV. Application and Submission Information

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Note: Additional provisions that apply to this section of the NOFO, including those related to Intergovernmental Review, can be found in the [EPA Solicitation Clauses](#).

### A. Requirement to Submit through Grants.gov and Limited Exception Procedures

Applicants must apply electronically through [Grants.gov](#) under this NOFO based on the grants.gov instructions below. If your organization has no access to the internet or access is very limited, you may request an exception from applying through Grants.gov for the remainder of this calendar year by following the procedures outlined [here](#).

Issues with submissions with respect to this NOFO only are addressed in section 3: *Technical Issues with Submission* below.

#### **1. SAM.gov (System for Award Management) Registration Instructions**

Organizations applying to this funding opportunity must have an active SAM.gov registration. If you have never done business with the Federal Government, you will need to register your organization in SAM.gov. If you do not have a SAM.gov account, then you will need to create an account using [login.gov](#) to complete your SAM.gov registration.

SAM.gov registration is FREE. The process for entity registration includes obtaining a Unique Entity ID (UEI), a 12-character alphanumeric ID assigned an entity by SAM.gov, and requires assertions, representations and certifications, and other information about your organization. Please review the [Entity Registration Checklist](#) for details on this process.

If you have done business with the Federal Government previously, you can check your entity status using your government issued UEI to determine if your registration is active. SAM.gov requires you renew your registration every 365 days to keep it active.

Please note that SAM.gov registration is different than obtaining a UEI only. Obtaining an UEI only validates your organization's legal business name and address. Please review the [Frequently Asked Question](#) on the difference for additional details.

Organizations should ensure that their SAM.gov registration includes a current e-Business (EBiz) point of contact name and email address. The EBiz point of contact is critical for Grants.gov Registration and system functionality.

Contact the [Federal Service Desk](#) for help with your SAM.gov account, to resolve technical issues or chat with a help desk agent: (866) 606-8220. The Federal Service desk hours of operation are Monday – Friday 8am – 8pm ET.

#### **2. Grants.Gov Registration Instructions**

Once your SAM.gov account is active, you must register in Grants.gov. Grants.gov will electronically receive your organization information, such as e-Business (EBiz) point of contact email address and UEI. Organizations applying to this funding opportunity must have an active Grants.gov registration. Grants.gov registration is FREE. If you have never applied for a federal grant before, please review the [Grants.gov](#)



[Applicant Registration](#) instructions. As part of the Grants.gov registration process, the EBiz point of contact is the only person that can affiliate and assign applicant roles to members of an organization. In addition, at least one person must be assigned as an Authorized Organization Representative (AOR).

Only person(s) with the AOR role can submit applications in Grants.gov. Please review the [Intro to Grants.gov-Understanding User Roles](#) and [Learning Workspace – User Roles](#) and [Workspace Actions](#) for details on this important process.

Please note that **registering in grants.gov for the first time can take a month or more** for new registrants. Applicants must ensure that all registration requirements are met to apply for this opportunity through Grants.gov and should ensure that all such requirements have been met well in advance of the application submission deadline.

Contact [Grants.gov](#) for assistance at 1-800-518-4726 or [support@grants.gov](mailto:support@grants.gov) to resolve technical issues with Grants.gov. Applicants who are outside the U.S. at the time of submittal and are not able to access the toll-free number may reach a Grants.gov representative by calling 606-545-5035. The Grants.gov Support Center is available 24 hours a day 7 days a week, excluding federal holidays.

### **Application Submission Process**

To begin the application process under this NOFO, go to Grants.gov and click the red “Apply” button at the top of the view grant opportunity page associated with this opportunity.

The electronic submission of your application to this NOFO must be made by an official representative of your organization who is registered with [Grants.gov](#) and is authorized to sign applications for Federal financial assistance. If the submit button is grayed out, it may be because you do not have the appropriate role to submit in your organization. Contact your organization’s EBiz point of contact or contact [Grants.gov](#) for assistance at 1-800-518- 4726 or [support@grants.gov](mailto:support@grants.gov).

Applicants need to ensure that the Authorized Organization Representative (AOR) who submits the application through [Grants.gov](#) and whose UEI is listed on the application is an AOR for the applicant listed on the application. Additionally, the UEI listed on the application must be registered to the applicant organization's SAM.gov account. If not, the application may be deemed ineligible.

### **Application Submission Deadline**

Your organization's AOR must submit your complete application package (including any resubmission as explained in Section II.C) electronically to EPA through [Grants.gov](#) no later than November 21, 2024, at 11:59 PM ET. Please allow for enough time to successfully submit your application and allow for unexpected errors that may require you to resubmit. Please see [Section II](#) and [Section V](#) describing the rolling application submittal and review process for this NOFO.

Applications submitted through Grants.gov will be time and date stamped electronically. Please note that successful submission of your application through Grants.gov does not necessarily mean your application is eligible for award. Any application submitted after the application deadline time and date deadline will be deemed ineligible and not considered.

### **3. Technical Issues with Submission**

If applicants experience technical issues during the submission of an application that they are unable to

resolve, follow these procedures **before** the application deadline date:

- a. Contact the Grants.gov Support Center **before** the application deadline date.
- b. Document the Grants.gov ticket / case number.
- c. Send an email with EPA-R-OEJECR-OCS-23-04 in the subject line to [CCGP@epa.gov](mailto:CCGP@epa.gov) before the application deadline time and include the following information:
  - i. Grants.gov ticket / case number(s)
  - ii. Description of the issue
  - iii. The entire application package in PDF format

Without this information, EPA may not be able to consider applications submitted outside of Grants.gov. Any application submitted after the application deadline will be deemed ineligible and **not** be considered.

Please note that successful submission through Grants.gov or email does not necessarily mean your application is eligible for award.

EPA will make decisions concerning acceptance of each application submitted outside of Grants.gov on a case-by-case basis. EPA will only consider accepting applications that were unable to submit through Grants.gov due to [Grants.gov](https://www.grants.gov) or relevant [SAM.gov](https://www.sam.gov) system issues or for unforeseen exigent circumstances, such as extreme weather interfering with internet access. Failure of an applicant to submit the application prior to the application submission deadline time and date because they did not properly or timely register in SAM.gov or Grants.gov is not an acceptable reason to justify acceptance of an application outside of Grants.gov.

#### **4. Required Forms and Documents**

The following forms and documents are required under this NOFO:

##### **Mandatory Documents for Track I and Track II Applications**

1. **Application for Federal Assistance (SF-424)**
2. **Budget Information for Non-Construction Programs (SF-424A)**
3. **EPA Key Contacts Form 5700-54**
4. **EPA Preaward Compliance Review Report Form 4700-4** (Please see these [Useful Tips](#) for completing this form)
5. **Project Narrative Attachment Form:** Use this to prepare your Project Narrative as described in [Section IV.B](#) below.
6. **Attachments:** Use the "Other Attachments Form" in Grants.gov for the following additional documents. These attachments are not subject to the page limitation that applies to the Project Narrative identified below and some have their own page limitation as identified below:
  - **Attachments for Track I and Track II Applications:**
    - **Attachment A:** Program Budget Template (See below in [Section IV.B](#) and also optional template in Appendix G)
    - **Attachment B:** Partnership Agreement (See [Section III.A](#) and Appendix B)
    - **Attachment C:** Any other documents or information not listed above, such as an Indirect Cost Rate Agreement.
  - **Attachments for Track I Applications Only:**
    - **Attachment D:** Project Area Map as described in Appendix A.
    - **Attachment E:** Community Engagement and Collaborative Governance Plan as described in [Section I.G](#) that does not exceed 10 single spaced pages-excess



- pages will not be reviewed.
- **Attachment F:** Community Strength Plan as described in [Section I.G](#) that does not exceed 5 single spaced pages-excess pages will not be reviewed.
- **Attachment G:** Readiness Approach Information as described in [Section I.G](#).
- **Attachment H:** Compliance Plan as described in [Section I.G](#).

## B. Content of Application Submission

Applicants should read the following sections very carefully. A complete application package includes the forms and documents listed above in [Section IV.A.4: Required Forms and Documents](#), which includes the materials further described below.

When preparing the content of their applications, and to ensure that their application materials address all the evaluation criteria for Track I and II applications, applicants should review the evaluation criteria in Section V. These criteria place increased emphasis on certain evaluation criteria that are integral to ensuring that the application will advance environmental and climate justice, CCG objectives, and maximize benefits to disadvantaged communities.

Note: Please see [Section V](#) for information on the Track I oral presentation process referenced in [Section I.D](#).

### **Project Narrative for Track I and II Applications**

Below are the instructions for both Track I and Track II applications. There are different instructions for each track, so applicants should carefully read the instructions and contact EPA at [CCGP@epa.gov](mailto:CCGP@epa.gov) with any questions.

The Project Narrative for both application tracks are comprised of Sections A and B as described below for each track and should include the information and content below. Applicants should ensure it includes information addressing the relevant evaluation criteria in [Section V](#) for Track I or II applications and any applicable threshold eligibility criteria in [Section III.D including identifying and describing the disadvantaged communities to benefit from the grants](#).

- The Project Narrative for Track I applications must not exceed twenty (20) single-spaced pages and be on letter size pages (8 ½ X 11 inches). Excess pages will not be reviewed.
- The Project Narrative for Track II applications must not exceed fifteen (15) single spaced pages and be on letter size pages (8 ½ X 11 inches). Excess pages will not be reviewed.

Applicants are encouraged to be concise and do not need to use all the pages within the page limit. Links to external websites or content will not be reviewed or considered. Any pages beyond the page limitations will not be reviewed by the Review Panel. It is recommended that applicants use a standard font (e.g., Times New Roman, Calibri, and Arial) and a 12-point font size with 1- inch margins. While these guidelines establish the acceptable type size requirements, applicants are advised that readability is of paramount importance and should take precedence in selection of an appropriate font for use in the application. **The grant application forms and other attachments identified in [Section IV.A.4: Required Forms and Documents](#) above are not included in the Project Narrative page limits**

To assist EPA reviewers, applicants should reference the numbers and titles of the evaluation criteria in their Project Narratives to help identify where the criteria are being addressed as applicable. A table is included in [Section V.A](#) to show how the components relate to one another and to the evaluation criteria. Applicants should contact EPA with any questions about the application content requirements.

## **Track I Project Narrative**

Track I applications consist of a Project Narrative with two sections as identified below: (A) Executive Summary and (B) Project Workplan. Together these cannot exceed 20 pages as described above.

### **Section A. Executive Summary**

The Executive Summary should contain the elements below and should not exceed three pages.

- **Application Title:** Provide a name for the application.
- **Lead Applicant:** Name of the Lead Applicant.
- **Statutory Partner to the Lead Applicant:** Name of the Statutory Partner.
- **Contact Information:** Include a name, title, email address, and phone number for key personnel for the Lead Applicant and, Statutory Partner.
- **Eligibility:** Describe how the Lead Applicant and Statutory Partner meet the eligibility requirements in [Section III.A](#) of the NOFO.
- **Climate Action Strategy:** Specify which Climate Action Strategy(ies) is addressed in the application.
- **Pollution Reduction Strategy:** Specify which Pollution Reduction Strategy(ies) is addressed in the application.
- **Grant Award Period and Completion:** Provide estimated beginning and ending dates for the period of performance for your proposed grant. Given the requirement under CAA § 138(b)(1) that all grants must be completed within three years, all applications must state how the projects in the application, including any construction projects, can be completed within three years of award.
- **Amount of EPA Funding Requested:** See award sizes specified in [Section II.A](#).
- **Target Investment Area:** If the application is for a Target Investment Area as defined in Section II.A, please identify which one. If the application is not for a Target Investment Area, put N/A.
- **Disadvantaged Community to benefit from the projects:** Identify and describe the disadvantaged communities, as defined in Appendix A, intended to benefit from the projects in the application. See [Section III.D.3](#) for more detail.
- **Other Sources of Funding:** Briefly explain, to the extent you can, whether funding for the projects in your application is available under the Infrastructure Investments and Jobs Act (IIJA), other IRA programs, or other funding streams and if so your reasons for seeking funding for these projects under this NOFO. Please also note the Duplicate Funding clause included in Section IV of [the EPA Solicitation Clauses](#) incorporated by reference in this NOFO and referenced in Section V.E.
- **Resubmission Status:** Specify if the application is for a resubmission of a previously submitted and reviewed application. If so, please identify the date of the original submission and the date of EPA debriefing of the previously submitted application (See Section II.C for further information on the resubmission process).

### **Section B. Project Workplan**

The Project Workplan should contain the elements below.

#### **Part 1. Community-Driven Investments for Change**

##### **1.1 Community Vision Description.**



- **Community Description:** Provide an overview of the community to benefit from the projects in the application based on the Project Area map submitted and how they will benefit from the projects. The community description should describe the community's resources, assets, local community characteristics, and the type of benefits the grants will provide to the community.
- **Community Challenges:** Describe the needs and challenges the community in the Project Area is facing, including climate impacts, climate change risks / exposures, and / or localized pollution. Describe the impact of these challenges on the community, and particularly on priority populations within the Project Area who are acutely exposed to and impacted by climate, pollution, and weather-related threats, and / or who exhibit acute vulnerabilities or susceptibilities to the impacts of environmental pollution. See footnote 3 for more information on priority populations.
- **Community Vision:** Articulate a vision for the impact and benefits the grant would have on the community in the near and long term, including the effect it will have on reducing and preventing pollution; building resilience to climate change and mitigating current and future climate risks;; creating high-quality jobs and expanding economic opportunity through workforce development; and bolstering community strength by insuring that local residents receive the benefits of investments and have the opportunity to build on them for current and future generations.

**1.2 Selected Strategies:** As described in [Section I.G.](#), applications must address at least one Climate Action Strategy and at least one Pollution Reduction Strategy. Accordingly, applications should address the following requirements:

- **Strategy Overview** – for each selected Climate Action and Pollution Reduction Strategy:
  - Provide an overview of the strategy and associated projects and describe how they will be implemented during the grant term.
  - Describe how the strategies and associated projects in the application are integrated and / or designed to complement each other to benefit the disadvantaged communities
  - Explain how the amount / proportion of the requested funding was determined for each strategy and associated project in the application.
- **Climate Action Strategies**
  - Describe how the project(s) associated with the Climate Action Strategy(ies) will address the climate impacts, risks, and / or challenges facing the Project Area community; will decrease GHG emissions within the Project Area and increase overall community resilience to current and anticipated climate impacts; and are responsive to the community needs and challenges identified in the Community Vision Description.
- **Pollution Reduction Strategies**
  - Describe how the project(s) associated with the Pollution Reduction Strategy(ies) will address the localized pollution challenges facing the Project Area communities; will make substantial and measurable (i.e., quantifiable) progress towards preventing, reducing, and / or mitigating existing and future sources of pollution to benefit the Project Area; and are responsive to the community needs and challenges identified in the Community Vision Description.

- 1.3 **Community Engagement and Collaborative Governance Plan:** Applications should address the elements of the Community Engagement and Collaborative Governance Plan as described in [Section I.G](#), the sections of which are outlined below. As described in [Section IV.A.4](#), the plan cannot exceed 10 pages (excess pages will not be reviewed) and should be uploaded to Grants.gov as a separate attachment.
- **Past Community Outreach and Engagement Conducted:** The application should demonstrate how past engagement impacted the strategy and associated project selection and implementation approach included in the application. This includes describing selected outreach and engagement methods used for the Project Area, including engagement to specific neighborhoods or groups.
  - **Community Engagement Plan Implementation:** The applicant should demonstrate the specific community engagement methods, as well as how they will mitigate barriers and involve relevant governmental stakeholders necessary to support overall implementation.
  - **Collaborative Governance Structure:** The applicant should provide details regarding the roles and responsibilities of the Lead Applicant, Collaborating Entities, and community residents and / or community-selected representatives for implementing, managing, and overseeing the application's project activities, including how regularly they will meet to discuss project implementation.
- 1.4 **Community Strength Plan:** Applications should address the elements of the Community Strength Plan as described in [Section I.G](#), the sections of which are outlined below. As described in [Section IV.A.4](#), the plan cannot exceed 5 pages (excess pages will not be reviewed) and should be uploaded to Grants.gov as a separate attachment.
- **Maximizing Economic Benefits of Projects:** The applicant should describe how the projects included in the application will strive to maximize economic benefits for individuals in the Project Area, including priority populations.
  - **Displacement Avoidance:** The applicant should discuss potential near-term and long-term risks associated with the proposed projects to residents, small businesses, nonprofits, and other community members. Applicants should also assess and describe the vulnerability the community faces to rising costs attributable to their proposed project(s) and assess potential impacts to households, small businesses, and other existing groups.

## Part 2. Program Management, Capability and Capacity

- 2.1 **Performance Management Plan, Outputs / Outcomes:** Applicants should describe the environmental results of the proposed project in terms of well-defined outputs and, to the maximum extent practicable, well-defined outcomes that will demonstrate how the project will contribute to the Community Change Grants goals and objectives. (See [Section I.I](#) and [Appendix E](#) for more detail on expected outputs and outcomes). In addition to identifying expected project outputs and outcomes, applicants should describe how they plan to track and measure their project performance, including through indicator tracking, to monitor progress towards achieving the expected outputs and outcomes throughout the performance period.

Applicants should also:



- Describe how they selected the expected outputs and outcomes and how they will lead to improvements to the environmental conditions and public health of the community members of the Project Area in the short and long term.
- Describe how the expected project outputs and outcomes are specific and include achievable and reasonable target measures within the project period.
- Describe how the recipient will use program evaluation activities (e.g., utilizing proper evaluation tools and personnel / organizations with experience in evaluating program and project progress / success) from project initiation through project completion to meaningfully document and measure their progress towards achieving project goals.

2.2 **Project Linkages to the EPA Strategic Plan:** Applications should describe how the proposed project activities support and advance EPA Strategic Plan Goal 2 (Take Decisive Action to Advance Environmental Justice and Civil Rights), Objective 2.1, (Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, and Local Levels). See [Section I.I](#). In addition, applications, depending on the projects included in them, should also address how they support and advance the following EPA Strategic Plan Goals as applicable:

- Goal 1 - Tackle the Climate Crisis
- Goal 4 - Ensure Clean and Healthy Air for All Communities
- Goal 5 - Ensure Clean and Safe Water for All Communities
- Goal 6 - Safeguard and Revitalize Communities; and
- Goal 7 - Ensure Safety of Chemicals for People and the Environment

Refer to the [EPA Strategic Plan](#).

2.3 **CBO Experience and Commitment:** Applications should describe the following for the Lead Applicant and / or Statutory Partner for the proposed grant:

- Their history and experience as a CBO.
- The depth of their commitment, connections, and relationships with the disadvantaged communities the application is intended to benefit.

2.4 **Programmatic and Managerial Capability and Resources:** Applications should provide information demonstrating the Lead Applicant's and Statutory Partner's ability to successfully complete, oversee, and manage the award including:

- Their organizational experience and capacity related to performing the proposed projects or similar activities (e.g., experience in managing projects and activities like those in the application)
- Their resources, capacity, capabilities, staff (e.g., project manager and other key personnel), expertise, and skills to perform and manage the award activities effectively during the three-year award period. For Lead Applicants submitting two applications under this NOFO, this includes how they demonstrate they have the above attributes to perform, manage, and oversee two awards effectively within the three-year award period.
- Their financial stability, controls in place, and capacity to manage taxpayer dollars ethically and efficiently as well as the policies and controls to be in place for project oversight and to manage program risk. This includes controls to identify waste, fraud, and abuse, and reduce the potential for waste, fraud, and abuse, by including plans and policies for program oversight, including confidential reporting (e.g., whistleblower protections),

and risk management.

- A projected milestone schedule for the proposed projects (up to three years) with a breakout of the project activities into phases with associated tasks and timeframes for completion of tasks, including the approach, procedures, and controls for ensuring that the award funds will be expended in a timely and efficient manner while ensuring that costs are eligible, reasonable, and allowable.

2.5 **Past Performance:** Describe federally funded and / or non-federally funded assistance agreements (assistance agreements include grants and cooperative agreements but not contracts) that the Lead Applicant performed within the last three years (no more than three agreements in total) and provide the information below for them. EPA agreements are preferred to be included.

- Describe whether, and how, the Lead Applicant was able to successfully complete and manage the agreements.
- Describe the history of the Lead Applicant in meeting the reporting requirements under the agreements including submitting acceptable final technical reports.
- Describe how the Lead Applicant documented and / or reported on whether progress towards achieving the expected results (i.e., outputs and outcomes) under those agreements was being made. If progress was not made, please indicate whether, and how, that was documented.

Note: In evaluating the Lead Applicant's past performance, the Agency will consider the information provided in the application and may also consider relevant information from other sources, including information from EPA files and / or from current and prior federal agency grantors (e.g., to verify and / or supplement the information provided by the applicant). If there is no relevant or available past performance information, please indicate this in the application, and you will receive a neutral score for these factors under Section V. Failure to provide any past performance information, or to include a statement that you do not have any relevant or available past performance or reporting information, may result in a zero score for these factors (see also Section V).

**Part 3. Readiness to Proceed, Feasibility, and Sustainability:** Provide the following information in the application:

- 3.1 **Readiness Approach:** Demonstrate, based on the Readiness Approach Requirements described in [Section I.G](#), the applicant's ability and readiness to proceed with grant performance for the projects in the application upon receiving an award, and generally no later than 120 days after award, in order to ensure that the projects can be completed within the statutory three-year grant period. As appropriate, this may include a description of the completed project planning and design phases related to the project(s) as well as demonstrating that the applicant has obtained and / or complied with the necessary approvals, permits, permissions, and any other applicable requirements, to commence project performance upon award, and if not their plan for doing so within 120 days of award.
- 3.2 **Feasibility:** Demonstrate that all the projects in the application can be successfully and effectively performed within the three-year grant period of performance, and the degree of risk that they cannot be. This includes describing how the strategies and associated projects can individually and collectively be completed within three years.



3.3 **Sustainability:** Demonstrate the extent to which the benefits and outcomes from the projects can be sustained after the three-year grant period of performance based on factors including but not limited to whether (i) the applicant will leverage funding and / or resources from other sources to ensure the sustainability of the projects beyond the three-year grant term and (ii) the description of an operations and maintenance approach including plans and commitments to ensure there is continued funding available for operation and maintenance activities of infrastructure activities for the projects after the grant term is over (e.g., are there demonstrated commitments for continuing operation and maintenance funding / resources from the appropriate parties after the three year grant term is over) including coordination with appropriate responsible parties.

3.4 **Program Budget Description:** Provide a detailed budget description and estimated funding amounts for each project component / task similar to that on the budget found in SF-424A, which includes the EPA funding requested to be expended over the three-year period of performance. This section provides an opportunity for a narrative description of the budget or aspects of the budget found in the SF-424A. In the description, explain how the budget is reasonable to accomplish the projects, and the cost-effectiveness of the budget in terms of maximizing the share of funds used for the delivery of benefits to disadvantaged communities (both the direct costs of funds passed through for financial assistance as well as associated indirect costs).

Note: A template to depict the program budget description is included as Appendix G and may be used to supplement the budget description in the Project Narrative. Applicants that do not use the template will not be penalized and applicants can convey the information in other forms. While the program budget description is part of the Project Narrative page limit, the template is not part of the page limit for the Project Narrative and will not count against the 20-page Project Narrative page limit for Track I applications.

3.5 **Compliance Plan:** Applicants must submit a Compliance Plan as described in [Section I.G](#) that does not exceed 5 pages. Excess pages will not be reviewed.

### **Track II Application Requirements**

Track II applications consist of a Project Narrative with two sections as identified below: (A) Executive Summary and (B) Project Workplan. Together these cannot exceed 15 pages as described above.

#### **Section A. Executive Summary**

The Executive Summary should contain the elements below and should not exceed two pages.

- **Application Title:** Provide a name for the application.
- **Lead Applicant:** Name of the organization applying.
- **Statutory Partner to the Lead Applicant:** Name of the Statutory Partner.
- **Contact information:** Include a name, title, email address, and phone number for key personnel for Lead Applicant, Statutory Partner.
- **Eligibility:** Describe how the Lead Applicant and Statutory Partner meet the eligibility requirements in [Section III.A](#) of the NOFO.
- **Disadvantaged Community to benefit from the projects:** Identify and describe the disadvantaged communities, as defined in Appendix A, intended to benefit from the projects in the application. See [Section III.D.3](#) for more detail.

- **Grant Award Period and Completion:** Provide estimated beginning and ending dates for the period of performance for your proposed grant. Given the requirement under CAA § 138(b)(1) that all grants must be completed within three years, all applications must state how the projects in the application can be completed within three years of award.
- **EPA Funding Requested:** See award sizes specified in [Section II.A.](#)
- **Other Sources of Funding** Briefly explain, to the extent you can, whether funding for the projects in your application is available under the Infrastructure Investments and Jobs Act (IIJA), other IRA programs, or other funding streams and, if so, your reasons for seeking funding for these projects under this NOFO. Please also note the Duplicate Funding clause included in Section IV of [the EPA Solicitation Clauses](#) incorporated by reference in this NOFO and referenced in Section [V.E.](#)
- **Resubmission Status:** Specify if the application is for a resubmission of a previously submitted and reviewed application. If so, please identify the date of the original submission and date of EPA debriefing of the previously submitted application (See Section II.C for further information on the resubmission process).

## Section B. Project Workplan

1. **Track II Program Objectives:** Applications should describe the following:

- How the application addresses the Track II objectives identified in [Section I.H.](#)
- What methods, tools, and trainings the applicant will use to facilitate the engagement of disadvantaged communities in state and Federal advisory groups, workshops, rulemakings, and / or other public processes, including local, Tribal, and other governmental processes, related to environmental and climate justice.
- How the application addresses the disadvantaged community's lack of access to, or weak relationships with, governmental entities, including how the application improves those relationships, increases points of access for disadvantaged communities with government entities, and creates channels to work cooperatively to promote environmental and climate justice
- How the application will result in governmental entities better understanding the root causes of environmental and climate justice issues that impact disadvantaged communities, so government leaders and decision-makers are better prepared to proactively address concerns before issues materialize.

2. **Project Collaboration and Participation:** Applications should describe the following:

- How meaningful input and feedback was considered from the disadvantaged community and other stakeholders in designing and developing the project and how input will continue to be obtained and considered during grant performance.
- The facilitation and accountability measures to establish and maintain trust between the disadvantaged community and government officials to ensure the community can collaborate in an authentic and meaningful way, rather than an insincere manner, on environmental and climate justice issues with governmental bodies.
- The applicant's and any Collaborating Entities' history of relationships and collaborations with disadvantaged communities, governmental bodies, and other stakeholders to address environmental and environmental / climate justice issues.

3. **Project linkages:** Applicants should describe how their application supports and advances [EPA Strategic Plan](#) Goal 2 (Take Decisive Action to Advance Environmental Justice and Civil Rights),



Objective 2.1, (Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, and Local Levels).

4. **Program Budget Description:** Applicants should describe:
  - The reasonableness of the budget and allowability of the costs for each component / activity of the project and their approach, procedures, and controls for ensuring that awarded grant funds will be expended in a timely and efficient manner to comply with the statutory 3-year project period limitation.
  - The cost effectiveness of the budget / project in terms of maximizing the share of funds used for the delivery of benefits to disadvantaged communities (both the direct costs of funds passed through for financial assistance as well as associated indirect costs to the greatest extent practicable).
  
5. **Environmental Results:** Applicants should describe the following:
  - Their plan, with associated timeframes, for tracking and measuring their progress in achieving the expected project outcomes and outputs for Track II applications. See [Section I.I](#) and [Appendix F](#) for more detail on expected outputs and outcomes.
  - Whether and how the projects and their outcomes are sustainable beyond the three-year grant period, and how they will leverage resources, community support, etc. to facilitate this. The quality and specificity of the proposed outputs and outcomes, and how they will lead to the success of the grants, should also be addressed.
  
6. **CBO Experience and Commitment:** Applicants should describe the following for the Lead Applicant and / or Statutory Partner for the proposed grant:
  - Their history and experience as a CBO.
  - The depth of their commitment, historical connections, and relationships with the disadvantaged community the application is intended to benefit.
  
7. **Programmatic and Managerial Capability and Resources:** Provide information demonstrating the Lead Applicant's and Statutory Partner's ability to successfully complete, oversee, and manage the award including:
  - Their organizational experience and capacity related to performing the proposed projects or similar activities (e.g., experience in managing projects and activities like those in the application).
  - Their resources, capacity, capabilities, staff (e.g., project manager and other key personnel), expertise, and skills to perform and manage the award activities effectively during the three-year award period. For Lead Applicants submitting two applications under this NOFO, this includes how they demonstrate they have the above attributes to perform, manage, and oversee two awards effectively within the three-year award period.
  - Their milestone schedule for the proposed projects (up to three years) including the breakout of the project activities into phases and timeframes for completion of tasks, and the approach, procedures, and controls for ensuring that the award funds will be expended in a timely and efficient manner while ensuring that costs are eligible, reasonable, and allowable.
  - Their legal and financial controls in place, and capacity to manage taxpayer dollars ethically and efficiently as well as the policies and controls for project oversight and program risk. This includes the extent and quality to which the application includes controls to identify waste, fraud, and abuse, and reduce the potential for waste, fraud, and abuse by including plans and policies for program oversight, including confidential reporting (e.g., whistleblower protections).



8. **Past Performance:** Describe federally funded and / or non-federally funded assistance agreements (assistance agreements include grants and cooperative agreements but not contracts) that the Lead Applicant performed within the last three years (no more than three agreements in total) and provide the information below for them. EPA agreements are preferred to be included.
- Describe whether, and how, the Lead Applicant was able to successfully complete and manage the agreements.
  - Describe the Lead Applicant's history of meeting the reporting requirements under the agreements including submitting acceptable final technical reports.
  - Describe how the Lead Applicant documented and / or reported on whether progress towards achieving the expected results (i.e., outputs and outcomes) under those agreements was being made. If progress was not being made, please indicate whether, and how, this was documented.

Note: In evaluating the Lead Applicant's past performance, the Agency will consider the information provided in the application and may also consider relevant information from other sources, including information from EPA files and / or from current and prior federal agency grantors (e.g., to verify and / or supplement the information provided by the applicant). If there is no relevant or available past performance information, please indicate this in the application, and you will receive a neutral score for these factors under Section V. Failure to provide any past performance information, or to include a statement that you do not have any relevant or available past performance or reporting information, may result in a zero score for these factors (see also Section V).

### C. Informational Webinars and Application Assistance

Applicants are encouraged to participate in webinars with EPA to address questions about this NOFO as well as to facilitate forming partnerships to apply under this NOFO. EPA will host a series of webinars about this NOFO while this NOFO remains open for application submission. EPA will post information about the webinars, schedule for webinars, as well as additional information about this NOFO (e.g., frequently asked questions, technical assistance), on [Inflation Reduction Act Community Change Grants Program](#) page. A recording of each webinar will be posted at the link above along with presented materials. EPA expects to host an informational webinar on December 7, 2023—please check the website listed above for further information.

In addition, for the partnership facilitation webinars, there will be break out group discussions on establishing partnerships with other organizations eligible to apply for EPA funding or to participate as Collaborating Entities in the projects. Please note that the EPA does not intend that the partnership forums to be used by individual consultants, consulting firms or other for-profit vendors to market their services to potential applicants as partners or otherwise.

Please note that in accordance with [EPA's Policy for Competition of Assistance Agreements](#), EPA Order 5700.5A1, EPA staff will not meet with individual applicants to discuss draft applications, provide informal comments on draft applications, or provide advice to applicants on how to respond to evaluation criteria. Please note, however, that as stated in Section I, technical assistance will be available to eligible applicants for help with this NOFO.

Applicants are responsible for the contents of their applications. However, consistent with the provisions in the NOFO, EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about this NOFO.



## Section V. Application Review Information

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Note: Additional provisions that apply to this section can be found at [EPA Solicitation Clauses](#).

### A. Threshold Eligibility Review Process

All applications will be evaluated for threshold eligibility purposes based on the threshold eligibility criteria described in [Section III.D](#).

### B. Review Panel and Evaluation Process

All applications that pass the threshold eligibility review process will be evaluated and scored by review panels using the track-specific evaluation criteria and processes described below. Review panels will be comprised of EPA staff and / or external reviewers. Track I applications will be reviewed by separate review panels for the written application and oral presentation. Track II applications will undergo only a written application review. See below for additional detail about the evaluation criteria and processes for each track.

### C. Track I Application Review Process, Evaluation Criteria, and Oral Presentations

All eligible Track I applications (including those for the TIAs described in [Section II.B](#)) will be evaluated on a 200-point scale as follows—155 points for the written application review and 45 points for the oral presentation review:

- The maximum points available for an application are 200 points—155 points for the written application based on the criteria specified below for Track I written applications, and 45 points for the oral presentation based on the criteria below.
- Applicants whose written application scores at least 110 points will then proceed to an oral presentation. Oral presentations will be conducted consistent with the procedures described below. Applicants who proceed to an oral presentation will be provided further information about the process following the evaluation of the written application.
- Applicants who do not proceed to an oral presentation will receive notification of non-selection from EPA and may request a debriefing as explained in the Section VI Debriefings and Disputes clauses included in the [EPA Solicitation Clauses](#) incorporated by reference in the NOFO. Applicants may resubmit an application in certain circumstances as noted in [Section II.C](#).
- The oral presentation will be worth 45 points and be evaluated based on the oral presentation criteria below.
- Applications that receive a total score of 170 or more (based on the written application and oral presentation) will be referred to the Selection Official for final selection consideration as described in [Section V.E](#) below.
- Applications that receive a total score between 110-169 (based on the written application and oral presentation) will be ranked and referred to the Selection Official, on an approximately monthly basis, for final selection consideration as described in [Section V.E](#) below.
- Applications not selected for award based on the monthly review will receive notification from EPA and may request a debriefing as explained in the Section VI Debriefings and Disputes clauses included in the [EPA Solicitation Clauses](#) incorporated by reference in the NOFO. Applicants may resubmit an application in certain circumstances as noted in Section II.C.

The evaluation criteria summarized in the table below correspond to the Track I Application Project Narrative components described in [Section IV.B. Applicants](#) should reference the index number and title of these components in their Project Narrative to facilitate the evaluation process.

**Track I Written Application Criterion**

Section	Possible
<b>Part 1. Community Driven Investments for Change</b>	<b>80 total</b>
1.1 Community Overview	10
1.2 Selected Strategies	45
1.3 Community Engagement and Collaborative Governance Plan	15
1.4 Community Strength Plan	10
<b>Part 2. Program Management, Capability, and Capacity</b>	<b>35 total</b>
2.1 Performance Management Plan, Outputs / Outcomes	6
2.2 Project Linkages to the EPA Strategic Plan	4
2.3 CBO Experience and Commitment	5
2.4 Programmatic and Managerial Capability and Resources	15
2.5 Past Performance	5
<b>Part 3. Readiness to Proceed, Feasibility, and Sustainability</b>	<b>40 total</b>
3.1 Readiness Approach	8
3.2 Feasibility	9
3.3 Sustainability	5
3.4 Program Budget Description	8
3.5 Compliance Plan	10
<b>TOTAL</b>	<b>155</b>

**Evaluation Criteria for Track I Written Applications (155 points total)**

**Part 1. Community Driven Investments for Change (80 points total)**

**1.1 Community Vision Description (10 points):**

- **Community Description:** Applicants will be evaluated based on their description of the community to benefit from the projects in the application, consistent with the Project Area map submitted, and the quality and extent to which they describe the community's resources, assets, and local characteristics, and the type of benefits the grants will provide to the community. (3 points)
- **Community Challenges:** Applications will be evaluated based on how well they describe the challenges and needs the community are facing, including climate impacts, climate change risks / exposures, and / or localized pollution, and the impact these challenges have on priority populations within the Project Area who are acutely exposed to and impacted by climate, pollution, and weather-related threats, and / or who exhibit acute vulnerabilities or susceptibilities to the impacts of environmental pollution. See footnote 3 for more information on priority populations. (4 points)
- **Community Vision:** Applications will be evaluated based on the quality and extent to which they articulate a clear vision for the impacts and benefits this grant would have on the community in the near and long term, as described further in [Section IV.B.](#) (3 points)



## 1.2 Selected Strategies (45 points)

- **Strategy Overview (15 points).** Applications will be evaluated based on the quality and extent to which they:
  - Provide an overview of the strategies and associated projects and describe how they will be implemented during the grant term. (6 points)
  - Describe how the strategies and associated projects in the application are integrated and / or designed to complement each other to benefit the disadvantaged communities, (6 points)
  - Explain how the amount / proportion of the requested funding was determined for each strategy and aligned project in the application. (3 points)
- **Climate Action Strategies (15 points).** Applications will be evaluated based on the quality and extent to which they:
  - Describe how the associated projects will address the identified climate impacts and / or climate change risk(s) / exposure(s) within the Project Area and explain how the project(s) will decrease GHG emissions within the Project Area and / or increase overall Project Area resilience to current and anticipated climate impacts. (8 points)
  - Describe how the selected Climate Action Strategies and associated projects help meet the needs and challenges of the community as articulated in the Community Vision. (7 points)
- **Pollution Reduction Strategies (15 points).** Applications will be evaluated based on the quality and extent to which they:
  - Describe how the associated project(s) will address the identified localized pollution challenges and will make substantial and measurable (e.g., quantifiable) progress towards preventing, reducing, and / or mitigating future sources of pollution to benefit the Project Area. (8 points)
  - Describe how the selected Pollution Reduction Strategies help meet the needs and challenges of the community as articulated in the Community Vision. (7 points)

## 1.3 **Community Engagement and Collaborative Governance Plan (15 points):** The Community Engagement and Collaborative Governance Plan described in Section 1.G will be evaluated based on the quality and extent to which it demonstrates:

- **Past Community Outreach and Engagement Conducted:** How the applicant's past engagement with the Project Area community impacted the Strategy and associated project selection and implementation approach included in the application, including the outreach and engagement methods used for the Project Area and specific neighborhoods or groups within the Project Area. (4 points)
- **Community Engagement Plan Implementation:** The specific community engagement methods used by the applicant, as well as how they will mitigate barriers and involve relevant governmental stakeholders necessary to support overall project implementation. (6 points)
- **Collaborative Governance Structure:** The details regarding the roles and responsibilities of the Lead Applicant, Collaborating Entities, and community residents and / or

community-selected representatives for implementing, managing, and overseeing the application's project activities, including how regularly they will meet to discuss project implementation. (5 points)

1.4 **Community Strength Plan (10 points):** The Community Strength Plan as described in [Section I.G](#) will be evaluated based on the quality and extent to which it demonstrates:

- **Maximizing Economic Benefits of Projects:** How the projects included in the application are intended to provide economic benefits for individuals in the Project Area, including priority populations as defined in footnote 3. (5 points)
- **Displacement Avoidance:** The measures for mitigating potential near-term and long-term risks associated with the proposed projects to residents, small businesses, nonprofits, and other community members, the vulnerability the community faces to rising costs attributable to their proposed project, and the potential project impacts to households, small businesses, and other existing groups. (5 points)

**Part 2. Program Management, Capability, and Capacity (35 points total)**

2.1 **Performance Management Plan and Outputs / Outcomes (6 points):** Applications will be evaluated based on:

- Whether the application describes an effective plan, with associated timeframes, for tracking and measuring progress in achieving the expected project outcomes and outputs including those identified in Appendix F, as appropriate, and any additional ones identified in the application. (2 points)
- The quality and specificity of the proposed outputs and outcomes and how they will lead to improvements to the environmental conditions and public health of the disadvantaged communities in the short and long term. (2 points)
- Whether, and how, the applicant has incorporated program evaluation activities (e.g., utilizing proper evaluation tools and personnel / organizations with experience in evaluating program and project progress / success) from project initiation through project completion to meaningfully document and measure their progress towards achieving project goals and how they will use the results of the evaluations to meet the project goals within the required timeframes. (2 points)

2.2 **Project Linkages to the EPA Strategic Plan (4 points):** Applications will be evaluated based on the extent and quality to which the proposed project activities support and advance EPA Strategic Plan Goal 2 (Take Decisive Action to Advance Environmental Justice and Civil Rights), Objective 2.1, (Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, and Local Levels).

In addition, applications, depending on the projects included in them, will also be evaluated based on the quality and extent to which they also support and advance the following EPA Strategic Plan Goals as applicable:

- Goal 1 - Tackle the Climate Crisis
- Goal 4 - Ensure Clean and Healthy Air for All Communities
- Goal 5 - Ensure Clean and Safe Water for All Communities



- Goal 6 - Safeguard and Revitalize Communities; and
- Goal 7 - Ensure Safety of Chemicals for People and the Environment

2.3 **CBO Experience and Commitment (5 points):** The CBO(s) that are either the Lead Applicant and / or Statutory Partner for the proposed grant will be evaluated based on their history and experience as a CBO and the depth of their commitment, connections, and relationships with the disadvantaged communities the application is intended to benefit.

2.4 **Programmatic and Managerial Capability and Resources (15 points):** The Lead Applicant and Statutory Partner will be evaluated based on their ability to successfully complete, oversee, and manage the award considering:

- Their organizational experience and capacity related to performing the proposed project(s) or similar activities (e.g., experience in managing projects and activities like those in the application). (4 points)
- Their resources, capacity, capabilities, staff (e.g., project manager and other key personnel), expertise, and skills to perform and manage the award activities effectively during the three-year award period. For Lead Applicants submitting two applications under this NOFO, this includes how they demonstrate they have the above attributes to perform, manage, and oversee two awards effectively within the three-year award period (4 points)
- The milestone schedule for the proposed projects (up to three years) including the breakout of the project activities into phases and timeframes for completion of tasks, and the approach, procedures, and controls for ensuring that the award funds will be expended in a timely and efficient manner while ensuring that costs are eligible, reasonable, and allowable. (3 points)
- Their financial stability, controls in place, and capacity to manage taxpayer dollars ethically and efficiently as well as the policies and controls for project oversight and program risk. This includes the extent and quality to which the application includes controls to identify waste, fraud, and abuse, and reduce the potential for waste, fraud, and abuse by including plans and policies for program oversight, including confidential reporting (e.g., whistleblower protections). (4 points)

2.5 **Past Performance (5 points):** The Lead Applicant will be evaluated based on their ability to successfully complete and manage the proposed projects considering their:

- Past performance in successfully completing and managing the assistance agreements identified in response to [Section IV.B](#). (3 points)
- History of meeting the reporting requirements under the assistance agreements identified in response to [Section IV.B](#) including whether the applicant submitted acceptable final technical reports under those agreements and the extent to which the applicant adequately and timely reported on their progress towards achieving the expected outputs and outcomes under those agreements and if such progress was not being made whether the applicant adequately reported why not. (2 points)

Note: The focus of this criterion is on the Lead Applicant's past performance and not that of any other Collaborating Entities or contractors / consultants who may be assisting the applicant with performance of the award. In evaluating the Lead Applicant under these factors, EPA will consider the information provided in the application and may also consider relevant information from other sources, including information from EPA files and from current / prior grantors. If the Lead Applicant does not have any relevant or available past performance related to federal or non-federal grants, this should be stated explicitly in the application (e.g., our organizations have no relevant

past grants experience). Including this statement will ensure you receive a neutral score for these factors (a neutral score is half of the total points available in a subset of possible points). Failure to include this statement may result in your receiving a score of 0 for these factors.

**Part 3. Readiness to Perform, Feasibility, and Sustainability (25 points total):**

- 3.1 Readiness Approach (8 points):** Applications will be evaluated based on the applicant's ability and readiness to proceed with grant performance for the projects in the application, based on the Readiness Approach Requirements described in [Section I.G.](#), upon receiving an award, or generally no later than 120 days after award, to ensure that the projects can be completed within the statutory three-year grant period. As appropriate, this may include evaluating the description of the completed project planning and design phases related to the project(s) as well as demonstrating that the applicant has obtained and / or complied with the necessary approvals, permits, permissions, and any other applicable requirements, to commence project performance upon award, and if not generally within 120 days of award.
- 3.2 Feasibility (9 points):** Applications will be evaluated based on whether it is demonstrated that all the projects in the application can be successfully and effectively performed within the three-year grant period of performance, and the degree of risk that they cannot be. This includes also evaluating how the strategies and associated projects can individually and collectively be completed within three years.
- 3.3 Sustainability (5 points):** Applications will be evaluated based on whether it is demonstrated that the benefits and outcomes from the projects in the application can be sustained after the three-year grant period of performance based on factors including but not limited to whether (i) the Applicant will leverage funding and / or resources from other sources to ensure the sustainability of the projects beyond the three-year grant term and (ii) the description of an operations and maintenance approach including the plans and commitments to ensure there is continued funding available for operation and maintenance activities of infrastructure activities for the projects after the grant term is over (e.g., are there demonstrated commitments for continuing operation and maintenance funding / resources from the appropriate parties after the three year grant term is over) including coordination with appropriate responsible parties.
- 3.4 Program Budget Description (8 points):** The program budget will be evaluated based on:
- The reasonableness of the budget and allowability of the costs for each component / activity of the projects in the application. This includes evaluating whether funding is well balanced and equitably distributed to project partners, including sub-awardees, commensurate with their role in the project, and whether funding is categorized into the proper budget categories providing clarity, accuracy, and granularity on the applicant's planned use of the grant funds during the project period. (4 points)
  - The cost effectiveness of the budget / project in terms of maximizing the share of funds used for the delivery of benefits to disadvantaged communities (both the direct costs of funds passed through for financial assistance as well as associated indirect costs to the greatest extent practicable). (4 points)
- 3.5 Compliance Plan (10 points):** Applications will be evaluated based on the quality and extent to which the Compliance Plan addresses the elements for the Compliance Plan described in [Section I.G.](#)



### **Track I Oral Presentation (45 points total)**

The oral presentation is intended to supplement the written application, and provide an opportunity for applicants to further explain their projects. The oral presentations will be conducted through video teleconferencing; however, requests for a telephone-only conference will be considered, provided the applicant describes why video teleconferencing is a barrier that cannot be overcome with technical assistance provided through EPA as noted in Section I.E. Pre-recorded presentations that lack real-time interaction will not be allowed. EPA will also provide interpretive services for the oral presentation upon request.

Further instructions and details about the oral presentation (e.g., date, time, requirements, limitations and / or prohibitions on the use of written material or other media to supplement the oral presentations, the time permitted for each oral presentation) will be provided to those applicants selected to participate in an oral presentation. EPA will maintain a record of the oral presentation (e.g., transcription) and relevant information from the oral presentation may be incorporated into the grant award terms and conditions as appropriate.

Applicants are responsible for determining who will represent them at the oral presentation, but it must include a representative(s) of the Lead Applicant and should include Collaborating Entity and community representatives as necessary. Contractors, including consultants, cannot attend the oral presentation for the applicant.

The oral presentation will be approximately 45 minutes including an introduction and closing. It is expected it will be conducted by two EPA and / or external reviewers who will evaluate the oral presentation based on the criteria below. The reviewers may ask clarifying questions during the presentation to enhance their understanding of the application, but they will be limited to clarifying issues related only to the areas listed below. The oral presentation cannot be used to change the scope of the applicant's written application, make any substantive changes to it, cure material omissions in the written applications, and / or otherwise revise the written application. The oral presentation will be evaluated on the below criteria.

### **Oral Presentation Criteria (45 points total)**

- **Community Overview:** How was the Project Area, as defined in Appendix A, chosen to be the beneficiary of the projects in the application? What are the greatest needs for the communities within the Project Area, and, if your application is not selected for funding what would be the adverse consequence to those communities? (9 points)
- **Strategy Rationale:** Why did you select the strategies and projects within the application, and how will they (collectively and individually) transform the Project Area to address environmental and climate justice challenges now and in the future (beyond the three-year grant term)? Also, when the three-year grant term is complete, how will you assess whether the grant was successful in achieving its objectives to benefit the Project Area and what will success look like? (9 points)
- **Community Engagement and Collaborative Governance:** Describe your commitment, as well as that of the Collaborating Entities as described in Section III.A of the NOFO, to efficiently and effectively perform the projects in the application within three years and describe how all entities will work together to achieve the project objectives within the three-year grant performance period. (9 points)
- **Management Capacity:** Explain how you have the programmatic, technical, administrative, and managerial capability, experience, and resources to properly manage the grant consistent with grant regulations and requirements including those in 2 CFR §200 (9 points)

- **Performance Challenges:** What do you anticipate are the greatest challenges to completing the projects in the application within the three-year time frame, and what are your plans for overcoming them? (9 points)

#### D. Track II Application Review Process and Evaluation Criteria

All eligible Track II application will be evaluated on a 100-point scale using the criteria specified below. **There will be no oral presentation component for the Track II applications.**

Track II applications that score at least 85 points will be referred to the Selection Official for final selection consideration as described in [Section V.E](#) below. Those Track II applications whose total score is below 85 will be ranked by EPA staff and reviewed on an approximately monthly basis by the Selection Official. Those not selected for award during the monthly review will receive notification from EPA and may request a debriefing as explained in the Section VI: Debriefings and Disputes clauses are included in the [EPA Solicitation Clauses](#) incorporated by reference in the NOFO. Applicants may resubmit an application in certain circumstances as noted in [Section II.C](#).

#### Evaluation Criteria for Track II Applications

Track II applications will be evaluated using the criteria below on a 100-point scale. The evaluation criteria summarized in the table below correspond to the Track II Application Project Narrative components described in [Section IV.B](#). To assist EPA reviewers, applicants should reference the numbers and titles of the evaluation criteria in their Project Narratives to help identify where the criteria are being addressed as applicable.

#### Track II Evaluation Criteria

Section	Possible Points
1. Program Objectives	35
2. Project Collaboration and Participation	20
3. Project Linkages	4
4. Budget	8
5. Environmental Results	6
6. CBO Experience & Commitment	5
7. Programmatic and Managerial Capability and Resources	16
8. Past Performance	6
<b>TOTAL</b>	<b>100</b>

1. **Track II Program Objectives (35 points):** Applications will be evaluated based on the quality and extent to which they demonstrate:
  - How the project(s) in the application address the Track II objectives identified in [Section I.H](#). (10 points)
  - The methods, tools, and trainings, the applicant will use to facilitate the engagement of disadvantaged communities in state and Federal advisory groups, workshops, rulemakings,



and / or other public processes, including local, Tribal, and other governmental processes, related to environmental and climate justice. (10 points)

- How the project(s) in the application address and improve the disadvantaged community's lack of access to, or weak relationships with, governmental entities and changes those relationships to increase points of access for disadvantaged communities with government to work cooperatively to promote environmental and climate justice. (8 points)
- Will result in governmental entities better understanding the root causes of environmental and climate justice issues that impact disadvantaged communities, so the communities are better prepared to proactively address them before the issues materialize. (7 points)

2. **Project Collaboration and Participation (20 points):** Under this criterion, applications will be evaluated based on the quality and extent to which they:

- Demonstrate that meaningful input and feedback was considered from the disadvantaged community and other stakeholders in designing and developing the applications and how feedback / input will continue to be obtained and considered during grant performance. (10 points)
- Describe the facilitation and accountability measures to establish and maintain trust between the disadvantaged community and government officials to ensure the community can collaborate in a meaningful manner on environmental and climate justice issues with governmental bodies. (5 points)
- Demonstrate the applicant's and Collaborating Entities relationships and history of collaborations with disadvantaged communities, governmental bodies, and other stakeholders to address environmental and environmental / climate justice issues. (5 points)

3. **Project linkages (4 points):** Applications will be evaluated based on the extent and quality to which the proposed project activities support and advance EPA Strategic Plan Goal 2 (Take Decisive Action to Advance Environmental Justice and Civil Rights), Objective 2.1, (Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, and Local Levels).

4. **Budget (8 points):** Under this criterion, applicants will be evaluated based on:

- The reasonableness of the budget and allowability of the costs for each component / activity of the project and their approach, procedures, and controls for ensuring that awarded grant funds will be expended in a timely and efficient manner to comply with the statutory 3-year project period limitation. (4 points)
- The cost effectiveness of the budget / project in terms of maximizing the share of funds used for the delivery of benefits to disadvantaged communities (both the direct costs of funds passed through for financial assistance as well as associated indirect costs to the greatest extent practicable). (4 points)

5. **Environmental Results (6 points):** Applications will be evaluated based on the quality and extent to which:

- They describe an effective plan, with associated timeframes, for tracking and measuring their progress in achieving the expected project outcomes and outputs for Track II applications including those identified in Appendix F. (3 points)
  - They demonstrate that the project can ensure sustainability of outcomes beyond the three-year grant period, and how they will leverage resources, community support, etc. to facilitate this. (3 points)
  - The quality and specificity of the proposed outputs and outcomes, and how they will lead to the success of the grants, are described. (3 points)
6. **CBO Experience and Commitment (5 points):** The CBO(s) that are either the Lead Applicant and / or Statutory Partner for the grant will be evaluated based on their history and experience as a CBO and the depth of their commitment, connections, and relationships with the disadvantaged communities the application is intended to benefit.
7. **Programmatic and Managerial Capability and Resources (16 points):** The Lead Applicant and Statutory Partner will be evaluated based on their ability to successfully complete, oversee, and manage the award considering:
- Their organizational experience and capacity related to performing the proposed projects or similar activities (e.g., experience in managing projects and activities like those in the application). (4 points)
  - Their resources, capacity, capabilities, staff (e.g., project manager and other key personnel), expertise, and skills to perform and manage the award activities effectively during the three-year award period. For Lead Applicants submitting two applications under this NOFO, this includes how they demonstrate they have the above attributes to perform, manage, and oversee two awards effectively within the three-year award period. (4 points)
  - The milestone schedule for the proposed projects (up to three years) including the breakout of the project activities into phases and timeframes for completion of tasks, and the approach, procedures, and controls for ensuring that the award funds will be expended in a timely and efficient manner while ensuring that costs are eligible, reasonable, and allowable. (3 points)
  - Their legal and financial controls in place, and capacity to manage taxpayer dollars ethically and efficiently as well as the policies and controls for project oversight and program risk. This includes the extent and quality to which the application includes controls to identify waste, fraud, and abuse, and reduce the potential for waste, fraud, and abuse by including plans and policies for program oversight, including confidential reporting (e.g., whistleblower protections). (5 points)
8. **Past Performance (6 points total):** The Lead Applicant will be evaluated based on their ability to successfully complete and manage the proposed projects considering their:
- Past performance in successfully completing and managing the assistance agreements identified in response to Section IV. (3 points)



- History of meeting the reporting requirements under the assistance agreements identified in response to Section IV including whether the applicant submitted acceptable final technical reports under those agreements and the extent to which the applicant adequately and timely reported on their progress towards achieving the expected outputs and outcomes under those agreements and if such progress was not being made whether the applicant adequately reported why not. (3 points)

The focus of this criterion is on the Lead Applicant's past performance and not that of any other Collaborating Entities or contractors / consultants who may be assisting the applicant with performance of the project. In evaluating the Lead Applicant under these factors, EPA will consider the information provided in the application and may also consider relevant information from other sources, including information from EPA files and from current / prior grantors. If you do not have any relevant or available past performance related to federal or non-federal grants, you should state this explicitly in your application (e.g., our organization has no relevant past grants experience). Including this statement will ensure you receive a neutral score for these factors (a neutral score is half of the total points available in a subset of possible points). Failure to include this statement may result in your receiving a score of 0 for these factors.

#### E. Final Selection Process and Other Factors

The Selection Official will make the final selection recommendations for Track I and II applications based on the evaluation criteria and process described above. In addition, in making the final selection recommendations for award, the Selection Official may also consider any of the "other" factors below, and as noted in [Section I](#) and [Section II](#) EPA anticipates making a minimum of fifteen awards for high-ranking applications that include a workforce training project(s) as described in [Section I.G](#).

In making the final selection recommendations for award, the Selection Official may consider any of the following "other factors":

1. Geographic diversity to promote a mix of high-scoring applications benefitting disadvantaged communities located in urban, rural, or remote areas, different regions of the country, territories, as well as the geographical nature or impact of the project(s).
2. Program priorities- how the application supports and advances EPA and OEJECR's goals and priorities, including those in EPA's Strategic Plan that focus on environmental climate and justice issues. This may also include considering how the application promotes Community Change Grant program objectives, the depth and extent of community involvement in project development and implementation, as well as the priority that the grants must be able to be successfully completed within three years to meet CAA § 138 statutory requirements.
3. Organizational diversity in terms of applicant type and size to ensure a broad representation of applicants receiving awards to improve program effectiveness and equity.
4. Whether the applicant is participating in a federal capacity building program as part of the Thriving Communities Network (please see complete list at [Federal Interagency Thriving Communities Network](#) or the [Rural Partners Network](#)).
5. Whether the projects support, advance, or complement funding related to [Community Disaster Resilience Zones \(CDRZs\)](#) as designated by FEMA.
6. The capacity and capabilities of Lead Applicants, who are selected for two awards under this NOFO, to successfully perform, manage, and oversee both grants within the three-year grant term and the risks posed by multiple awards to successful grant performance.
7. The extent to which the EPA funding may complement or be coordinated with other EPA funding or other Federal and / or non-Federal sources of funds / resources to leverage additional resources

to contribute to the performance and success of the grant. This includes but is not limited to funds and other resources leveraged from businesses, labor organizations, non-profit organizations, education and training providers, and / or Federal, state, Tribal, and local governments, as appropriate.

8. Duplicate funding considerations as stated in Section IV of [the EPA Solicitation Clauses](#) incorporated by reference in this NOFO. This includes considering whether funding for the projects in the application is available under the Infrastructure Investments and Jobs Act (IIJA), other IRA programs, or other funding streams and if so the applicant's reasons for seeking funding for these projects under this NOFO.
9. Availability of funds.

In addition, because the objectives of this NOFO are part of a government-wide effort to address environmental and climate justice concerns and challenges, information pertaining to proposed selection recommendations may be shared by EPA with other Federal, state, local, territorial, or Tribal governmental departments or agencies before final selections are made in order to determine whether potential selections under this NOFO: (1) are expected to be funded by another department or agency to minimize the possibility of duplicate funding, (2) could be affected by permitting, regulatory or other issues involving another department or agency, and / or (3) will complement or can be used to leverage funding and capacity-building by another department or agency to maximize value. Note that this process is separate from the Intergovernmental Review requirements in 40 CFR Part 29.

#### F. Anticipated Announcement and Federal Award Date

As stated in [Section II.C](#), applications will be reviewed and selected on a rolling basis and may be submitted through November 21, 2024. EPA anticipates it will announce initial selection decisions for awards under this NOFO by March 2024 with the initial awards being made in May / June 2024.



## Section VI. Award Administration Information

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Note: Additional provisions that apply to this section of the NOFO, including those related to responsibilities under civil rights laws, can be found in the [EPA Solicitation Clauses](#).

### A. Award Notification and Disputes

EPA anticipates that the first notification of selected applicants will be made via electronic mail in March 2024 and will continue to be done on a rolling basis. The notification will be sent to the original signer of the application, or the contact listed in the application. This notification, which informs the applicant that its application has been selected, is not an authorization to begin work. The official notification of an award will be made by the EPA Award Official. Applicants are cautioned that only a grants officer is authorized to bind the Government to the expenditure of funds; selection does not guarantee an award will be made. For example, statutory authorization, funding, readiness to perform projects, or other issues discovered during the award process may affect the ability of EPA to make an award to an applicant. The award notice, signed by a grants officer, is the authorizing document and will be provided through electronic mail. The successful applicant may be requested to prepare and submit additional documents and forms that must be approved by EPA before the grant can officially be awarded. The time between notification of selection and finalization of the award agreement can take up to 90 days or longer.

Assistance agreement competition-related disputes will be resolved in accordance with the dispute resolution procedures published in 70 FR (Federal Register) 3629, 3630 (January 26, 2005), which can be found at [Grant Competition Dispute Resolution Procedures](#). Copies of these procedures may also be requested by contacting the person listed in [Section VII](#) of the announcement. Note, the FR notice references regulations at 40 CFR Parts 30 and 31 that have been superseded by regulations in 2 CFR Parts 200 and 1500. Notwithstanding the regulatory changes, the procedures for competition-related disputes remain unchanged from the procedures described at 70 FR 3629, 3630, as indicated in 2 CFR Part 1500, Subpart E.

Non-profit applicants that are recommended for funding under this announcement are subject to pre-award administrative capability reviews consistent with Section 8b, 8c, and 9d of [EPA Order 5700.8: EPA's Policy on Assessing Capabilities of Non-Profit Applicants for Managing Assistance Awards](#). In addition, non-profit applicants selected for awards over \$200,000 may be required to fill out and submit to the grants management office EPA Form 6600.09, United States Environmental Protection Agency Administrative Capability Questionnaire with supporting documents as required in EPA Order 5700.8.

Depending on the projects in the grant award, EPA will impose programmatic terms and conditions to ensure successful and timely grant performance. In addition, if applicants have any questions about whether a proposed project cost is eligible or allowable, they should contact EPA for clarification prior to application submittal.

### B. Administrative and National Policy Requirements

Grantees will be subject to administrative and national policy requirements. Note that EPA plans to establish programmatic requirements in the terms and conditions of each grant agreement to implement these administrative and national policy, and other relevant, requirements, which will include but not be limited to: this award is subject to the requirements of the Uniform Administrative Requirements, Cost



Principles and Audit Requirements for Federal Awards; Title 2 CFR, Parts 200 and 1500. EPA also has programmatic regulations located in 40 CFR Chapter 1 Subchapter B.

A listing and description of general EPA regulations applicable to the award of assistance agreements is available on the [EPA Policies and Guidance for Grants](#) page.

**Readiness to Perform Requirements:** Following selection and before award, EPA may work with selected applicants to ensure that all approvals, requirements, permits, and permissions that are needed to begin performance will, if not already obtained or complied with, be resolved by the time of award, and if not generally within 120 days of award (unless extended by EPA). A term and condition may also state that EPA may terminate the award for the recipients' failure to meet these requirements.

**State / Territories Operation and Maintenance:** Because of their unique roles, State and territorial governments may receive subawards to help implement specific project activities such as an infrastructure project in which they own the land or where they have governmental technical expertise and staffing necessary to effectively implement activities of an infrastructure or other type of project. The terms of the EPA award will also require, if applicable, that state and territorial subrecipients commit to operation and maintenance funding for any infrastructure constructed or improved on land they own with funding available under the NOFO.

**Build America, Buy America Act (BABA):** Certain projects under this NOFO may be subject to the Buy America domestic content sourcing requirements under the Build America, Buy America (BABA) provisions of the Infrastructure Investment and Jobs Act (IIJA) (P.L. 117-58, §§ 70911-70917). These provisions apply when using Federal funds for the purchase of goods, products, and materials on any form of construction, alteration, maintenance, or repair of infrastructure in the United States. BABA requires that all iron, steel, manufactured products, and construction materials consumed in, incorporated into, or affixed to federally funded infrastructure projects must be produced in the United States. Please consider this information when preparing budget information and your application. The award recipient must implement these requirements in its procurements, and these requirements must flow down to all subawards and contracts at any tier. For more information, consult EPA's Build America, Buy America [website](#). When supported by rationale provided in the Infrastructure Investments and Jobs Act (IIJA) §70914, the recipient may submit a BABA waiver request to EPA. The recipient should request guidance on the submission instructions of an EPA waiver request from their EPA Project Officer. A list of approved EPA waivers is available on the BABA website. In addition to BABA requirements, all procurements under grants may be subject to the domestic preference provisions of 2 CFR §200.322.

**Davis-Bacon and Related Acts (DBRA):** The Davis-Bacon and Related Acts (42 U.S.C. §§ 3141-3144) set labor standards, including prevailing wages and fringe benefits, and apply to most federally funded contracts for construction of public works. The DBRA labor standards and reporting requirements apply to construction projects assisted with grants authorized by the CAA, including this program, as provided in CAA § 314 (42 U.S.C. § 7614).<sup>15</sup> A term and condition specifying DBRA compliance requirements will be included in the grant agreement.

**Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA):** The URA applies to acquisitions of property and displacements of individuals and businesses that result from federally

<sup>15</sup> EPA will use the definition of *Construction* in 40 CFR 33.103 to determine whether funding will be for a construction project. That definition defines *Construction* as "... erection, alteration, or repair (including dredging, excavating, and painting) of buildings, structures, or other improvements to real property, and activities in response to a release or a threat of a release of a hazardous substance into the environment, or activities to prevent the introduction of a hazardous substance into a water supply."



assisted programs. The URA and Federal Highway Administration's implementing regulations at 49 CFR Part 24 require grantees to follow certain procedures for acquiring property for grant purposes, such as notice, negotiation, and appraisal requirements. The statute and regulations also contain requirements for carrying out relocations of displaced persons and businesses, such as reimbursement requirements for moving expenses and standards for replacement housing. A term and condition specifying URA compliance requirements will be included in the grant agreement.

**National Historic Preservation Act (NHPA):** Section 106 of the NHPA requires all federal agencies to consider the effects of their undertakings, including the act of awarding a grant agreement, on historic properties. If NHPA compliance is required, necessary Section 106 consultation activities, such as historic or architectural surveys, structural engineering analysis of buildings, public meetings, and archival photographs, can be considered allowable and allocable grant costs. A term and condition specifying NHPA compliance requirements will be included in the grant agreement.

Note that Section 7(c) of the Energy Supply and Environmental Coordination Act of 1974 (15 U.S.C. § 793(c)(1)) exempts all actions under the CAA from the requirements of NEPA (National Environmental Policy Act). This Section states: "No action taken under the Clean Air Act shall be deemed a major Federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969." Therefore, as a grant program authorized under the CAA, NEPA will not apply to projects funded under the Community Change Grants.

**Justice40 Reporting:** The activities to be performed under the awards are expected to contribute to the President's goal that 40% of overall benefits of certain federal investments flow to disadvantaged communities (the Justice40 Initiative. See Section I.A). Recipients, therefore, will be expected to report on certain metrics to demonstrate to what extent the activities contribute to the 40% goal. A term and condition specifying reporting of metrics demonstrating the extent to which the grant's activities advance this 40% goal will be included in each grant agreement.

**Signage:** The activities to be performed under the awards are expected to publicize that they were funded by the U.S. Environmental Protection Agency and the Inflation Reduction Act (e.g., via signs at the place(s) of performance. The award will include appropriate terms and conditions about signage requirements.

**Environmental Justice Grant Applicant Database:** The Community Change Grants program strives to support as many CBOs that apply regardless of their ultimate success in receiving a grant, by, as appropriate 1) familiarizing applicants with federal grant application requirements, 2) sharing expectations and responsibilities of managing federal grants, 3) providing constructive feedback and recommendations on ways to strengthen unselected applications, 4) helping organizations build sustainability into projects so they continue to grow and develop after the project period is over, and 5) facilitating connections with other potential resources that can help organizations address community needs. To facilitate the achievement of these, all applicants who apply under this NOFO will be added to our Environmental Justice Grant Applicant Database.

**Reporting Requirements:** Grantees will be subject to both program performance as well as financial and administrative reporting requirements, as described below. Note that EPA will only collect reporting information from the Lead Applicant (rather than from any subrecipients), but each Lead Applicant may need to collect reporting information from subrecipients (e.g., Collaborating Entities, Statutory Partners) to meet these reporting requirements.

**Program Performance Reporting:** In accordance with 2 CFR § 200.329, each grantee will be subject to program performance reporting requirements. Reporting requirements effective during the period of

performance will be established in the grant agreement's terms and conditions, and reporting requirements effective after the period of performance will be established in a closeout agreement.

During the period of performance, EPA will require each grantee to submit quarterly performance reports within 30 days after the end of each reporting period (and with additional requirements every fourth quarterly report i.e., annually) as well as a final performance report within 90 days after the end of the period of performance. EPA will require that each grantee's chief executive officer or equivalent review and submit each of these reports. EPA will use information from these reports as part of program-wide public reporting, except to the extent such information includes confidential business information (CBI) or personally identifiable information (PII) pursuant to 2 CFR § 200.338.<sup>16</sup> Included below is information that EPA may require in these reports.

**Financial and Administrative Reporting Requirements:** Each grantee will be subject to financial and administrative reporting requirements, which will be included in the grant agreement's terms and conditions ([EPA's General Terms and Conditions](#)). These requirements will include, but not be limited to:

- **Federal Financial Report:** In accordance with 2 CFR § 200.328 and 2 CFR § 200.344, each grantee must submit the Federal Financial Report ([SF-425](#)) at least annually and no more frequently than quarterly. The frequency of reporting and report submission instructions will be specified in the terms and conditions.
- **Financial Records Retention:** In accordance with 2 CFR § 200.334, each grantee will be required to retain financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to the grant award for a period of three years from the date of submission of the final expenditure report. Additional record retention requirements on program income used after the end of the period of performance will be specified in close-out agreements.
- **MBE / WBE Utilization:** When required, each grantee must complete and submit a "MBE/WBE Utilization Under Federal Grants and Cooperative Agreements" report ([EPA Form 5700-52A](#)) on an annual basis.
- **Real Property Status Report:** In accordance with 2 CFR § 200.329, each grantee must submit a "Real Property Status Report" ([SF-429](#)) to report real property status or request agency instructions on real property that was / will be provided as Government Furnished Property (GFP) or acquired (i.e., purchased or constructed) in whole or in part under a federal financial assistance award.

### C. Audit Requirements

In accordance with 2 CFR § 200.501(a), each grantee will be required to obtain a single audit from an independent auditor, if the grantee expends \$750,000 or more in total federal funds in the grantee's fiscal year. Audits will be made public in accordance with the process described in 2 CFR § 200.512. The grantee must submit the form SF-SAC and a Single Audit Report Package within 9 months of the end of the grantee's fiscal year or 30 days after receiving the report from an independent auditor. The SF-SAC and a Single Audit Report Package MUST be submitted using the [Federal Audit Clearinghouse's Internet Data Entry System](#). In addition, each grantee may be subject to additional audit requirements, including but not limited to compliance requirements as part of any compliance supplement to the single audit.

### D. Remedies for Non-Compliance

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<sup>16</sup> Information claimed as CBI in accordance with this Notice will be disclosed only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B.



In accordance with 2 CFR § 200.208, 2 CFR § 200.339, and 2 CFR § 200.340, EPA is provided authority for multiple potential responses if a grantee violates the terms of the grant agreement.

#### E. Program Administration Activities

Under 2 CFR § 200.403 and other applicable provisions of 2 CFR Part 200, Subpart E, costs are allowable under federal awards so long as they are necessary and reasonable for the performance of the grant award. Under this NOFO, consistent with these regulations, program administration activities are allowable costs, with such activities supporting administration of the grant program. Program administration activities include (but are not limited to) conducting due diligence and underwriting financial transactions; establishing and convening advisory councils; conducting program performance and other reporting activities (e.g., expenditures for personnel and equipment to procure technology infrastructure and expertise for data analysis, performance, and evaluation); and supporting, monitoring, overseeing, and auditing subrecipients, contractors, and program beneficiaries.

#### F. Fraud, Waste, and Abuse Awareness

Recipients of awards under this NOFO need to be alert and sensitive to indicators of fraud, waste, and abuse regarding the use of federal funds under the award. Fraud generally is a false representation about a material fact and can be any intentional deception designed to unlawfully deprive the United States or the EPA of something of value or to secure for an individual a benefit, privilege, allowance, or consideration to which he or she is not entitled. Waste generally involves the taxpayers not receiving a reasonable value for money in connection with any government-funded activities due to an inappropriate act or omission. Most waste does not involve a violation of law; rather, waste relates primarily to mismanagement, inappropriate actions, and inadequate oversight. Abuse generally involves behavior that is deficient or improper when compared with behavior that a prudent person would consider reasonable and necessary business practice given the facts and circumstances. Abuse may also include misuse of authority or position for personal financial interests of those of an immediate or close family member or business associate. Abuse does not necessarily involve fraud or violation of laws, regulations or grant provisions. Indicators of fraud, waste, and abuse can be found on the EPA Office of Inspector General [website](#). Recipients should report any suspected fraud, waste, and / or abuse to the EPA Project Officer for the award or the EPA Office of Inspector General. Note that EPA Project Officers will refer matters to the EPA Office of Inspector General as appropriate.

#### G. Quality Management Plans (QMPs) & Quality Assurance Project Plans (QAPPs)

Quality assurance documentation is required for awards that involve environmental information operations. EPA Project Officers will work with all selected recipients on quality assurance (QA) requirements. Once the award is made, if a QMP and / or QAPP is required for the project, the applicant will develop the document and submit for EPA's approval. Selected applicants cannot begin environmental information operations until EPA approves the QMP and / or QAPP.

**Environmental Information Operations:** A collective term that encompasses the collection, production, evaluation, or use of environmental information and the design, construction, operation, or application of environmental technology. Environmental information includes data and information that describe environmental processes or conditions. Examples include but are not limited to: direct measurements of environmental parameters or processes, analytical testing results of environmental conditions (e.g., geophysical, or hydrological conditions), information on physical parameters or processes collected using environmental technologies, calculations or analyses of environmental information, information provided by models, information compiled or obtained from databases, software applications, decision support tools,

websites, existing literature, and other sources, and development of environmental software, tools, models, methods, and applications.

**Quality Management Plan (QMP):** The recipient may need to develop a QMP. The QMP describes an organization's Quality Program. Requirements for QMPs are found in the most recent version of EPA's [Quality Management Standard](#). A QMP documents the technical activities to be performed and how the program will integrate QA, quality control, QAPPs, training, etc., into all its environmental information operations.

**Quality Assurance Project Plans (QAPP):** The recipient may need to develop a QAPP(s). A QAPP describes how environmental information operations are planned, implemented, documented, and assessed during the life cycle of a project. Requirements for QAPPs are found in the most recent version of [EPA's Quality Assurance Project Plan Requirements / Standard Quality Assurance Project Plans \(QAPP\)](#). Quality assurance is sometimes applicable to assistance projects (see 2 CFR 1500.12). Quality assurance requirements apply to the collection of environmental data. Environmental (data are any measurements or information that describe environmental processes, location, or conditions; ecological or health effects and consequences; or the performance of environmental technology. Environmental data include information collected directly from measurements, produced from models, and compiled from other sources, such as databases or literature. Once the award is made, if a Quality Assurance Project Plan is required for the project, the applicant will have to draft a QAPP prior to beginning work on the project. You must reserve time and financial resources in the beginning of your project to prepare your QAPP and include the cost for developing your QAPP in your Detailed Budget. Selected applicants cannot begin data collection until EPA approves the QAPP.



## Section VII. Contact Information

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For information or questions about this NOFO, please email: [CCGP@epa.gov](mailto:CCGP@epa.gov)

## Appendix A. Definition of Disadvantaged Communities and Mapping Requirements

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Applicants must demonstrate that the projects in their application would benefit a disadvantaged community. EPA is defining disadvantaged community as one that meets at least one of the following criteria:

1. A geographically-defined community identified as disadvantaged on the [EPA IRA Disadvantaged Communities Map](#). The map combines multiple datasets (including [CEJST](#) and [EJScreen](#)) that determine whether a community is disadvantaged for the purposes of implementing programs under the IRA. All datasets are assigned values at the Census block group level.<sup>17</sup> Instructions for how to use the map to identify disadvantaged community eligibility are below under the section titled “EPA’s IRA Disadvantaged Community Layer Availability.”
2. A community that falls into one of the following two categories<sup>18</sup>:
  - a. A farmworker community comprised of individuals with no fixed work address, who travel from their permanent residence to work in agriculture on a temporary or seasonal basis, and may relocate several times throughout the year. Applicants can demonstrate that a farmworker community is comprised of such individuals by submitting verification documentation from an authorizing governmental entity or through comparable means.
  - b. A Disadvantaged Unincorporated Community (DUC). For purposes of this NOFO, DUCs are generally defined as Census Designated Places<sup>19</sup> that lack fixed legally determined geographic boundaries and have certain common characteristics and conditions (e.g., the absence of adequate permanent water, sewer services, or acceptable housing). This includes all areas defined as Colonias by the U.S. Department of Housing and Urban Development (HUD),<sup>20</sup> Colonias that are not defined by HUD but are identifiable on the “Colonias” layer in EJScreen are also considered DUCs. DUC status can also be demonstrated through submitting localized data that represent similar characteristics. Applicants who seek funding for projects in a DUC Targeted Investment Area should demonstrate eligibility using the DUC criteria listed above. Applicants should direct questions to [CCGP@epa.gov](mailto:CCGP@epa.gov) regarding verification.

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<sup>17</sup> The EPA IRA Disadvantaged Community User Layer Guide includes: 1) All census tracts that are identified as disadvantaged in the [Climate & Economic Justice Screening Tool \(CEJST\)](#); 2) Any census block group that is at or above the 90<sup>th</sup> percentile for any of EJScreen’s Supplemental Indexes when compared to the nation or state, and / or 3) any geographic area within Tribal lands (including Alaska Native Allotments, Alaska Native Villages, American Indian Reservations, American Indian Off-reservation Trust Lands, & Oklahoma Tribal Statistical Areas), as included in EJScreen. Note: CEJST is a tool used to identify disadvantaged communities in furtherance of the Justice40 Initiative from EO 14008. EPA’s [EJScreen](#) is an environmental justice mapping and screening tool that provides demographic and environmental information at a fine geographic resolution across the United States. The data described above from these tools are used to help ensure that projects benefit disadvantaged communities.

<sup>18</sup> Applicants are encouraged to acknowledge when communities identified in the following two categories overlap with the disadvantaged communities described above.

<sup>19</sup> [Census Designated Places](#) (CDPs) are statistical equivalents of incorporated places and represent unincorporated communities that do not have a legally defined boundary or an active, functioning governmental structure.

<sup>20</sup> [Colonias History – HUD Exchange](#).



## **Project Area and Project Area Map for Track I Applications**

### **Track I Applications**

For Track I applications, applicants must define the specific disadvantaged community that the projects and supporting activities will directly benefit by submitting to EPA one contiguous Project Area Map with an outlined boundary as instructed below.

The Project Area Map should also reflect where each project submitted under the application is located within the Project Area. The Project Area may include multiple census block groups (or the equivalent) that are designated as a disadvantaged community by EPA as defined above. All projects and activities should be located within the Project Area, except in cases where the project must be located outside of the Project Area to address the localized pollution issue at the source, or where otherwise necessary to ensure that the disadvantaged community will benefit from the project. One such example is if the project addresses water quality issues upstream to benefit a downstream community. While projects and activities may have an incidental benefit to census block groups (or other areas) that are not considered disadvantaged communities, the applicant must demonstrate that the projects' primary benefits will flow to disadvantaged communities in the Project Area.

Applicants may submit a map generated in EPA's EJScreen tool. Applicants also have the option to submit a map in another geospatial format such as a shapefile (.shp), geodatabase (.gdb), or map service if census data is not available for the community.

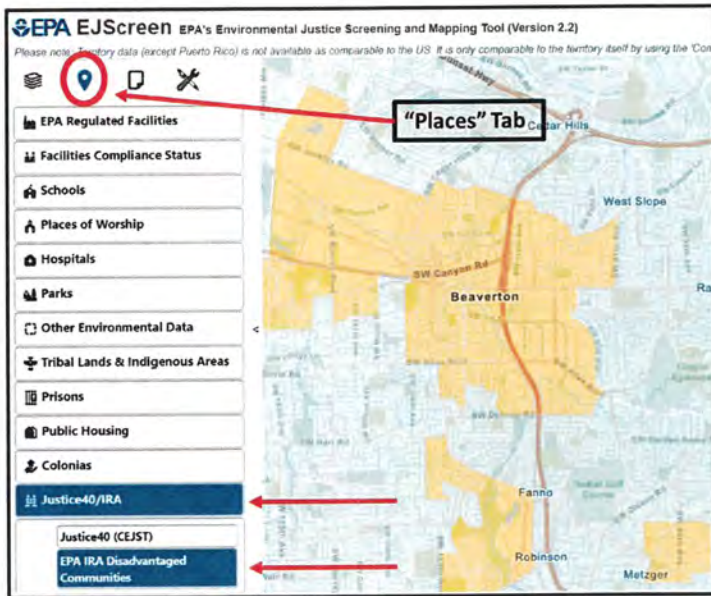
#### **The submitted map should include the following:**

- a. The Project Area with an outlined boundary.
- b. Main streets, landmarks, or both.
- c. Community assets (e.g., parks or play areas, schools, community center).
- d. Jurisdictional boundaries, including incorporated and unincorporated areas.
- e. Any other attributes that may provide important context about the Project Area.

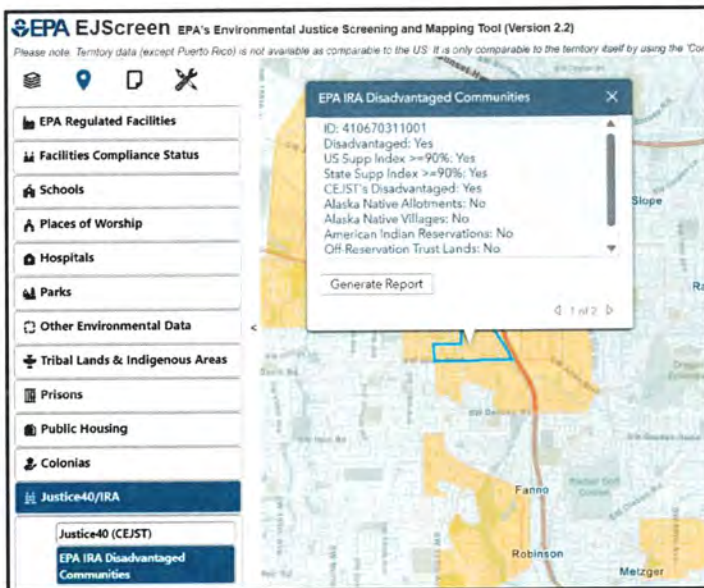
Note: While Track II applications are not required to submit a Project Area Map, as stated in Section III.D and IV.B they must describe and identify the disadvantaged communities that will benefit from the projects.

### **EPA's IRA Disadvantaged Community Layer Availability**

Within EJScreen, EPA's IRA Disadvantaged Community layer can be found in the "Places" tab by clicking the "Justice40 / IRA" category, and then selecting "EPA IRA Disadvantaged Communities." Census tracts designated as disadvantaged by the Climate and Economic Justice Screening Tool (CEJST) are also available in the same category. See screenshots below.

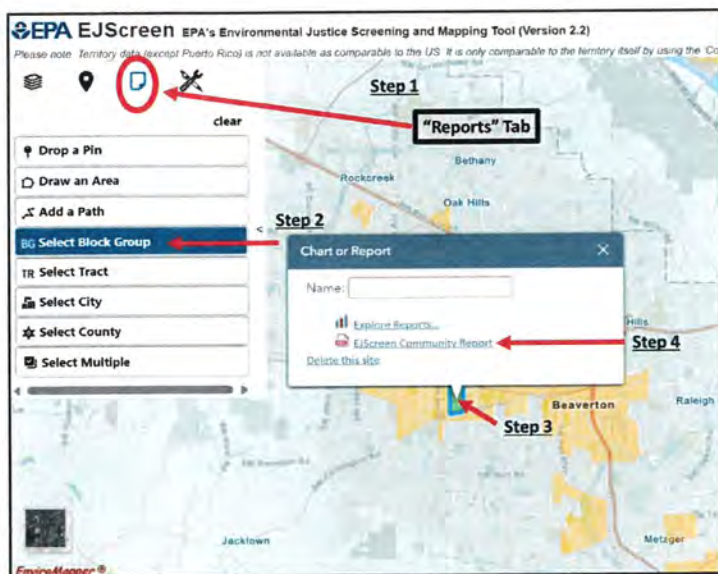


Users can click on the individual block groups to generate a pop-up indicating the criteria that led to the designation. Please see below:



To generate an EJScreen community report, click the "Reports" tab and then "Select Block Group" or "Select Multiple." Click on the disadvantaged community, and when the pop-up appears, select "EJScreen Community Report."





For disadvantaged communities that cannot be identified using the “EPA IRA Disadvantaged Communities” layer, applicants must describe the communities and indicate how the project will benefit them. Applicants may use other layers featured in EJScreen to help identify these communities.

If you would like the data products and technical document associated with this map layer, please visit: [Inflation Reduction Act Environmental and Climate Justice Program](#).

## Appendix B. Partnership Agreement between the Lead Applicant and Statutory Partner

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To be eligible for funding, the Lead Applicant must include in the application a copy of a written and signed Partnership Agreement with the Statutory Partner that is legally binding. At a minimum, the Partnership Agreement must specify the following:

- Who will be the Lead Applicant and the Statutory Partner.
- The Lead Applicant is responsible for the overall management, performance, oversight, and reporting responsibilities under the grant, and for making subawards to Collaborating Entities.
- The Lead Applicant will be responsible for the receipt of federal funds from EPA and the proper expenditure of these funds and will bear liability for unallowable costs.
- The roles and responsibilities of the Lead and Statutory Partner for project activities and how disputes between them will be handled and resolved. Please note that EPA is not a party to the Partnership Agreement, and any disputes between the parties must be resolved under the law applicable to the Partnership Agreement.
- The Lead Applicant is responsible for compliance and legal issues, and managing risks associated with the project. It must also describe the procedures for replacing a Statutory Partner with another Statutory Partner, and for ensuring the replacement has the comparable expertise, experience, knowledge, and qualifications of the replaced Statutory Partner to ensure successful grant completion within 3 years. Replacement may be necessary for various reasons including performance issues. Note that replacement requires prior approval by an authorized EPA official pursuant to 2 CFR 200.308(c)6).
- The Lead Applicant and Statutory Partner's agreement, if the proposed application is selected for award, to enter a subaward that complies with the subaward requirements in the grant regulations at 2 CFR 200.331 and in EPA's Subaward Policy and related guidance and that contains terms and conditions including those above.



## Appendix C. Climate Action Strategies and Associated Project Activities

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Eligible project activities associated with each Climate Action Strategy identified in Section I.G. of the NOFO could include but are not limited to the following examples. Applicants may propose different activities as long as they are consistent with the applicable Climate Action Strategy as described in Section I.G of the NOFO and are eligible for funding under section 138(b)(2) of the Clean Air Act.

### **Strategy 1: Green Infrastructure and Nature-based Solutions**

Examples:

- **Building climate resilience and carbon sequestration through tree planting**
  - Mitigate urban heat islands through reflective surfaces and shade trees or other vegetation, including preparing planting sites and establishing and caring for trees and other vegetation.
  - Plant trees in public spaces.
  - Plant trees in sites that are strategically selected to shade buildings (i.e., planted within 60 feet of a building).
- **Multi-benefit stormwater projects**
  - Construct permeable surfaces, collection basins, rain gardens, bioswales and other green infrastructure.
  - Restore and / or protect wetlands.
  - Improve urban forest site(s) to create new or more functional planting locations for trees and other vegetation, such as bioswales, which contribute to:
    - Greening to protect and conserve community lands and water;
    - Watershed protection that supports sensitive wildlife habitat and enhances water access.; and / or
    - Replacement of concrete or pavement and restoring spaces to more natural conditions to restore water to the community, reduce flooding, and improve public greenspace.
- **Public parks and open spaces**
  - Create new parks or enhance / expand existing parks to provide climate resilience benefits like heat island reduction and flood mitigation or other demonstrable environmental benefits.
  - Green existing schoolyards to protect vulnerable populations by adding nature-based solutions.

### **Strategy 2: Mobility and Transportation Options for Preventing Air Pollution and Improving Public Health and Climate Resilience**

Examples:

- Construct new, expanded, or enhanced bikeways, walkways, or non-motorized urban trails that reduce vehicle miles traveled and related air pollution by providing safe routes for zero-emission travel between residences, workplaces, commercial and community centers, and schools.
- Implement “[Complete Streets](#)” projects to improve walkability, bike-ability, and transit use, including improved access for people with disabilities. projects to improve walkability, bike-ability, and transit use, including improved access for people with disabilities that reduce vehicle miles traveled and related air pollution.

- Implement climate resilience measures on bikeways or trailways such as raising the elevation or installing permeable pavers to reduce flooding or increasing shade coverage to mitigate extreme heat.
- Conduct the measurement, analysis, design, planning and engineering work necessary to submit a competitive application for state and / or federal funding that will fund large-scale improvements (larger than this competition is able to fund) to significantly reduce a community’s Greenhouse Gas (GHG) emissions and / or improve climate resilience.
- Purchase, lease, or contract for the use of zero-emission vehicles for community car sharing, vanpooling, ride-sharing, and related mobility options.
- Purchase, construct, and / or install infrastructure, equipment, or facilities to create and / or support low or zero-emission transportation options.

Guidelines:

- Transportation projects that involve public transit or improvements to public property should include a governmental agency as a Collaborating Entity that will help perform and oversee the project.

**Strategy 3: Energy-Efficient, Healthy, Resilient Housing and Buildings**

Examples:

- Install energy efficiency measures such as insulation, double or triple glazed windows, “cool roofs” that reflect sunlight, and energy management systems in public buildings.
- Install ventilation systems to help improve indoor air quality during pollution-related events such as wildfires.
- Install or retrofit homes or multi-family housing with higher-efficiency electric heating, cooling, and cooking systems (e.g., heat pumps, heat pump water heaters, electric and induction stoves, electric clothes dryers).
- Reduce heat island effects by installing cool roofs on homes, multi-family housing, or public buildings.
- Implement other similar projects qualified under [HUD’s Green and Resilient Retrofit Program \(GRRP\)](#). Note that applicants who have received or will receive HUD funding under this program must have internal controls in place to ensure that the same costs are not charged to more than one Federal grant.<sup>21</sup>

Guidelines:

- In their Project Narrative, applicants should describe how low-income residents will directly benefit from the project through lower costs and how residents will be trained on how to operate and maintain new technology and equipment, where applicable.
- For projects that will fund home or multi-family housing improvements, applicants should include details of their target tenants or homeowners, such as with those incomes at or below the greater of:
  - For Metropolitan Areas: (1) 80% Area Median Income (AMI) and (2) 200% of the Federal Poverty Level

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<sup>21</sup> Refer to 2 CFR 200.403(f).



- For Non-Metropolitan Areas: (1) 80% AMI; (2) 80% Statewide Nonmetropolitan Area AMI; and (3) 200% of the Federal Poverty Level
- Applicants may also target community housing (e.g., land bank, housing conservancy, cooperative, or other community-based nonprofit) or public housing for this strategy.
- Applicants should refer to the description of the Community Strength Plan in the NOFO, particularly the need to minimize the risks associated with displacing current residents due to EPA-funded investments for this strategy.

#### **Strategy 4: Microgrid Installation for Community Energy Resilience**

##### Examples:

- Construct microgrid infrastructure.
- Install microgrids with onsite renewable energy generation and storage.
- Install ancillary energy infrastructure necessary to support microgrids.
- Install other energy infrastructure for microgrid operations.

##### Guidelines:

- The application should include details that demonstrate the extent to which the microgrid will serve the target community, such as: that the microgrid will be used to ensure that reliable power is provided for any community-serving buildings or critical facilities during extreme weather emergencies or any weather-related outages; that the community lacks an external grid, and the microgrid will be used to meet local energy consumption needs during normal or “blue sky” conditions; or where an external grid is available, that the microgrid will be capable of interconnecting with that grid to meet peak energy consumption demands and increase grid reliability.

#### **Strategy 5: Community Resilience Hubs**

##### Examples:

- Assess the most acute climate risks facing a community (e.g., extreme heat, flooding, wildfire), identify where the community has gaps in its resilience strategy, then design a plan to mitigate specific risks by creating or upgrading community facilities to serve as resilience hubs that remain operable during an emergency.
- Purchase and install backup power equipment such as generators or onsite solar and storage at one or more resilience hubs.
- Implement structural and non-structural retrofits to enhance the resilience of the hub (e.g., raise the building elevation to reduce flood risk, improve cooling systems and / or insulation to reduce extreme heat risk).
- Implement wildfire mitigation measures such as retrofitting the hub to reduce flammability, creating a defensible space between the hub and its surrounding environment, and installing air filtration equipment to reduce the risks of smoke inhalation.
- Purchase and install communications devices that can operate even with loss of local power and telecommunications systems.

##### Guidelines:

- The resilience hubs should be operable during an emergency. Applicants are encouraged to develop plans that will help ensure the facility is operable, including an emergency communications plan, plan for backup power during emergencies, and agreements and processes for activating the facility in the event of an emergency.
- The community resilience hub should be a community-convening space that provides climate resilience and related resources and services to community residents.
- Applicants should demonstrate how they will work with relevant emergency response organizations to maximize the efficacy and use of the resilience hub.

### **Strategy 6: Brownfields Redevelopment**

#### Examples:

- Build and / or upgrade existing structures and sites to improve community use while reducing GHG emissions and / or improving climate resilience.
- Implement greening efforts (tree-planting, park construction or renovations, community garden developments, etc.) that mitigate GHG emissions and / or improve climate resilience.
- Install low or zero emission energy infrastructure such as solar and storage.
- Conduct deconstruction and green demolition activities to support adaptive reuse or new construction. Applicants can refer to EPA's Climate Smart Brownfields Manual for information about green demolition activities.
- Acquire land to enable a brownfield redevelopment that has emissions mitigation and / or climate resilience benefits.

#### Guidelines:

- Redevelopment sites eligible for funding must be consistent with the federal definition of a Brownfield site in 42 U.S.C. 9601(39) as follows: a brownfield is a property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.
- Projects for adaptive reuse should explore and can leverage national and state historic preservation tax credits to maximize funding streams.<sup>22</sup>
- Applicants must demonstrate that no cleanup activities will be performed at the site, and / or that cleanup activities are not necessary at the site. This can be demonstrated by one of the following:
  - A completed Phase I Environmental Site Assessment with no recognized environmental conditions (RECs) at actionable levels;
  - A completed Phase II Environmental Site Assessment with sampling result levels below actionable levels;
  - Lead or asbestos building survey or equivalent environmental or building investigation to determine no likely sources of contamination or hazardous materials will be encountered on site that pose risks to the adjacent community or occupational health and safety risks to workers; or
  - No Further Action letter from the state or Tribal Brownfields response program.

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<sup>22</sup> See guidelines for [Tax Incentives for Preserving Historic Properties](#).



## **Strategy 7: Waste Reduction and Management to Support a Circular Economy<sup>23</sup>**

### Examples:

- Implement a community-scale composting program to reduce emissions from food waste that includes an educational campaign to inform Project Area residents about climate benefits of reducing food waste.
- Implement a community-scale recycling program.
- Reduce emissions from food waste by implementing programs that distribute unused food to project area residents.

### Guidelines:

- Where relevant, applicants should demonstrate that all inedible food scraps derived from projects are composted, and that other materials are diverted from landfills and support a circular economy.
- Where relevant, project activities should demonstrate how they are using EPA best practices related to the circular economy or other sources of guidance.<sup>24</sup> Resources include the [Planning for Natural Disaster Debris Sustainable and Resilient Communities Through Solid Waste Investments and Best Practices After Disasters](#).
- Applicants should consider EPA's ranking of [wasted food management pathways](#) and [EPA Waste Management hierarchy](#) for sustainable materials management.

## **Strategy 8: Workforce Development Programs for Occupations that Reduce GHG Emissions and Air Pollutants**

This strategy allows applicants to propose workforce development programs that will help reduce GHG emissions and other air pollutants to benefit disadvantaged communities.

This strategy allows applicants to propose workforce development programs for employment in fields that will help reduce GHG emissions and other air pollutants to benefit disadvantaged communities. A wide range of occupations support the reduction of GHG emissions and air pollutants. Because EPA cannot provide an exhaustive list of such occupations, applicants should describe how their workforce development program will support the reduction of GHG emissions or other air pollutants.

Examples of career pathways that may be part of a workforce development program include but are not limited to: electricians, steamfitters, pipefitters, laborers, and other skilled trades occupations that support building electrification, renewable energy projects, and other similar activities; occupations related to the manufacturing of low- and zero-emission technologies; careers in low- and zero-emissions transportation such as vehicle mechanics supporting electric vehicle technologies; community health and outreach workers that assist households in reducing their emissions and addressing sources of pollution; and other careers related to emissions reduction, such as methane mitigation or agricultural carbon mitigation. Applicants should describe how their workforce development program will support the reduction of GHG emissions or other air pollutants.

### Guidelines:

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<sup>23</sup> A circular economy is generally described as a model of production and consumption, which involves sharing, leasing, reusing, repairing, refurbishing, and recycling materials and products as long as possible and based on three main principles: eliminate waste and pollution, circulate products and materials, and regenerate nature.

<sup>24</sup> Refer to EPA's guidance on the [Circular Economy | US EPA](#)

As noted in Section I.G of the NOFO, strong workforce development programs should include the following three features at a minimum:

**1. Multi-sectoral partnerships that bring together workforce expertise and enable pathways into high-quality careers.**

The foundation of a strong workforce development initiative is a set of partners that represent diverse expertise, community and worker voice, and employer needs. For these programs, applicants may collaborate with organizations with workforce development expertise, such as labor unions, tradeswomen organizations, local workforce development boards (locate yours using this [U.S. Department of Labor search tool](#)), career and technical schools, community colleges, workforce development nonprofits, and other similar organizations.

Examples of the types of expertise and experience that are important for a successful workforce development program include, but are not limited to:

- Technical skills and experience to lead classroom and on-the-job training, including equipping students and individuals with the skills needed to succeed and be safe on the job, including knowledge of new and emerging greenhouse gas and other air emissions-reduction technologies;
- Knowledge of the local, State, and regional labor market and relevant relationships to have a deep understanding of employer hiring, staffing, and skilling needs, emerging trends especially related to the clean energy transition, and considerations for local job quality and worker voice;
- Strong awareness of the barriers individuals in the community face to training and employment, including an understanding of unique barriers specific populations face, and clear strategies for how to address those barriers; and
- Established relationships of trust within the community, including knowledge of relevant history and community dynamics, in addition to meaningful, long-lasting relationships in the community that will support trainee recruitment and participation.

**2. High-quality training models that are worker-centered, demand-driven, and lead to good jobs.**

Workforce development projects should be focused on training individuals for high-quality, long-term career pathways in family-sustaining jobs, rather than short-term or temporary, low-wage jobs. Applications should demonstrate that the workforce development project fulfills an industry demand in the Project Area and surrounding region, is informed and supported by employers, and has a clear pathway to long-term employment with family-sustaining wages. This will be key to delivering programs that enable true economic mobility for individuals in disadvantaged communities and bolster the capacity of communities to respond to environmental justice concerns in a sustained fashion.

Examples of high-quality, evidence-backed training models are: Apprenticeship readiness programs (or “pre-apprenticeships”) with a connection to one or more Registered Apprenticeship Programs; Registered Apprenticeship Programs (registered via the U.S. Department of Labor (DOL) Office of Apprenticeship or State Apprenticeship Agency); Joint Labor-Management Training Programs; paid internships; partnerships with community colleges or vocational schools that award an industry-recognized credential; and similar models that combine on-the-job learning, classroom learning, and mentorship. DOL has a resource on “high-road training programs” that applicants are invited to review [here](#).

Workforce development programs can serve adult or youth populations. Applicants may consider high-quality youth-serving training models, including: pre-apprenticeship programs that prepare young people to enter Registered Apprenticeship Programs; career and technical education programs (as described by the



[U.S. Department of Education](#)); and other similar models. Please note that applicants may propose programs to be included in the [American Climate Corps \(ACC\)](#), which is a federal government initiative focused on training young people for high-demand skills for jobs in the clean energy economy. To qualify as an ACC program, the program must provide youth with at least 300 hours of paid skills-based training and / or service. Applicants submitting a workforce development project to be considered for the ACC should note that in their application.

### **3. Strategies for recruiting and retaining individuals from disadvantaged communities, especially for populations that face disproportionate barriers to employment.**

It is a statutory requirement (section 138(b)(1) of the Clean Air Act) for this program to benefit disadvantaged communities. These benefits may include providing opportunities to individuals with barriers to training and / or employment, so they can find long-term employment and economic opportunity in fields associated with air pollutants and GHG reduction. Projects should be designed with comprehensive research and evidence-based strategies for addressing barriers to recruitment, training, employment, and retention. Examples include supportive services to meet the needs of the disadvantaged community, such as childcare and transportation assistance; life skills and basic skills training, such as financial literacy and job readiness, to prepare for a career related to GHG and air pollutant reduction; career services, such as developing individualized employment plans; peer-to-peer mentorship programs to connect experienced workers with new workers to help them learn the job and find a sense of belonging in the workplace; reasonable accommodations consistent with federal equal employment opportunity laws; coaching to support work-based learning; and case workers to support workers with barriers to employment.

#### **Applicants proposing a workforce development project are encouraged to describe the following elements and any additional details identified by the applicant:**

- Design of the program, including if the applicant is proposing a high-quality, evidence-backed training model as described above, and a description of the credential(s) the participants will earn.
- Duration of the program and program components, such as time spent in classroom and on-the-job training. Applicants are encouraged to also describe ongoing support participants will receive once they exit the training program and connect to full-time employment to support retention.
- How applicants will engage employers and how the program will connect to high-quality jobs. Applicants can review the federal Good Jobs Principles [here](#).
- Estimated number of participants that will be trained in the program.
- Plan for how the program will recruit participants and how the program will build visibility and trust among residents of the Project Area.
- Curriculum the program will use and how it is informed by industry standards and employer demand.
- Wages or stipends for the duration of the program. Applicants are strongly encouraged to provide reasonable compensation for time spent in training to increase participation and retention.
- Strategies the program will use to meet the needs of populations that experience barriers to training and employment.
- Applicant's approach to administering supportive services to mitigate barriers to training and employment.
- Indicators the program will use to evaluate success as well as the methodology the program will use to track the progress of participants during and after the program. Applicants may review the Six Primary Indicators of Performance used by the public workforce system, as described by the Department of Labor [here](#).

## Appendix D. Pollution Reduction Strategies and Associated Project Activities

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Eligible project activities associated with each Pollution Reduction Strategy could include but are not limited to the following examples. Applicants may propose different activities as long as the activities are consistent with the applicable Pollution Reduction Strategy described in Section I.G of the NOFO and are eligible for funding under section 138(b)(2) of the Clean Air Act.

### **Strategy 1: Indoor Air Quality and Community Health Improvements**

Examples:

- Remediate or mitigate harmful substances in buildings, including lead, mercury, pesticides, radon, mold, PCBs (caulk, flooring, etc.), lead-based paint, asbestos, and other toxic substances.<sup>25</sup>
- Install, upgrade, or replace HVAC and / or filtration systems that improve indoor quality in schools, community-serving buildings, and single-and-multifamily homes. These upgrades may be done in conjunction with climate strategies that reduce building GHG emissions.
- Equip community centers and community buildings in agricultural worker communities with decontamination stations (e.g., publicly available shower and laundry stations) to eliminate take-home pesticide exposures.
- Purchase equipment that can enable “do-it-yourself” upgrades using research-based methods, to distribute within communities impacted by smoke.
- Replace wood heaters that do not meet EPA’s New Source Performance Standards with more efficient, cleaner heaters certified by EPA, and independently verified to meet (or to have emissions below) the most stringent Step 2 emission reduction standards described in Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters, and Forced-Air Furnaces heaters.

### **Strategy 2: Outdoor Air Quality and Community Health Improvements**

Examples:

- Reduce exposure from mobile and stationary sources by:
  - developing or expanding vegetative barriers.
  - creating alternate truck route programs to decrease impacts to sensitive communities.
  - providing grants, rebates, or subsidies for households, small businesses, public partners, and community organizations to replace portable diesel equipment such as leaf blowers and lawn mowers with zero-emission alternatives.
  - retrofitting spray booths in local small businesses to reduce VOC contamination from auto body painters.
  - providing grants, rebates, or subsidies for backup battery systems to replace diesel backup generators in homes, public facilities, or small businesses.
- Create clean air zones or low-emission zones such as:

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<sup>25</sup> The prohibition on using Community Change Grant funding to remediate Brownfields sites does not apply to this activity.



- Encouraging “last-mile” delivery through electric delivery vehicles (e.g., trucks, vans, cargo bikes).
- Electrifying local government-owned fleets providing services to communities (e.g., sanitation trucks, public buses).
- Implementing urban designs that promote air flow and reduce the concentration of pollution along street corridors (e.g., remove or reduce costly parking mandates, reduce idling of diesel vehicles).
- Implement sustainable construction practices such as minimizing dust and emissions during building projects (e.g., electrify equipment, cover construction sites, utilize water sprays, properly manage waste).
- Replace toxic play surfaces that emit harmful pollutants (e.g., tire crumb and certain turfs at schools, community playgrounds, and fields) with non-toxic, permeable options to provide safe places for children to play.
- Develop other policies that promote reductions in air pollution from transportation such as land use and zoning policies that enable households to live in affordable, dense, and vibrant communities within urban and rural areas.

Guidelines:

- Communities seeking funding for zero-emission school buses should encourage their local school district apply to EPA’s \$5 billion [Clean School Bus program](#).

**Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience**

Examples:

- Perform targeted infrastructure upgrades such as:
  - Replacing private-side lead lines in a home, childcare facility, school, or other community-serving building during full lead service line replacement<sup>26</sup>
  - Septic to sewer conversions that connect homes to nearby community water systems.
  - Installing working water fountains at schools and parks where there are no fountains or they are inoperable, malfunctioning, or contaminated.
  - Installing water conservation and efficiency technologies that will allow utilities to better monitor and reduce energy consumption onsite.
  - Installing water reuse technologies that allow for system decreases in both energy and water use efficiencies through water capture, loss prevention, and closed loop approaches.
- Prepare and apply for state and / or federal water infrastructure funding to address larger community needs (e.g., a leak detection and pipe replacement plan, a PFAS action plan, or upgrades to water and wastewater treatment facilities that reduce pollution) by:
  - Assessing the problem through water sampling and monitoring.
  - Developing a plan, which could include the necessary design and engineering work.
  - Preparing an application for federal funding to one of several sources such as to EPA’s State Revolving Loan funds.
- Provide emergency interventions such as:

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<sup>26</sup> [EPA’s Drinking Water Regulations for Lead, Lead Service Lines, Strategies to Achieve Full Lead Service Line Replacement](#).

- providing recurring point-of-use filters while communities await lead service line replacement.
- providing alternate water supplies for communities and buildings that have contaminated water (PFAS, lead, PCBs, arsenic, nitrates, etc.) in communities with contaminated water systems.
- adopting facility procedures or system upgrades that allow for service flexibilities, mobility, and continuity in the event of an emergency due to climate-related disaster events.

**Guidelines:**

- The projects should also include a public outreach / education campaign on safe drinking water and / or wastewater, working with the public water system where possible.<sup>27 28</sup>
- Activities should be coordinated with the EPA funded [Environmental Finance Centers](#) to minimize duplication of effort.

**Strategy 4: Safe Management and Disposal of Solid and Hazardous Waste**

**Examples:**

- Purchase equipment for hazardous waste sampling to determine classification.
- Collect, process, recycle, or otherwise dispose of household hazardous waste and electronics programs and infrastructure.
- Conduct compliance oversight for the collection, processing, recycling, storage and disposition of household hazardous waste and electronics.
- Develop or expand hazardous waste collection, recycling, and safe recycling programs and infrastructure.
- Develop or expand safe disposal technologies for hazardous waste.
- Reduce demand for single-use plastic products (by installing public water bottle refill stations and water fountains or implementing community and city-scale water reuse and refill systems), and phasing out single-use products that may be unnecessary.

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<sup>27</sup> [EPA on Reducing Lead in Drinking Water. EPA Communication Plan 3Ts. Basic Information about Your Drinking Water.](#)

<sup>28</sup> [Drinking Water Analytical Methods.](#)



## Appendix E. Job Quality & Equitable Employment Opportunities

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It is a priority of the EPA that this grant program supports high-quality, family-sustaining, community-strengthening jobs with the free and fair choice to join a union, consistent with [Executive Order 14082, Implementation of the Energy and Infrastructure Provisions of the Inflation Reduction Act of 2022](#). As such, EPA is interested in funding proposals that have a commitment to creating good jobs and utilizing a diverse, highly skilled workforce, including an emphasis on creating employment opportunities for populations living in communities that are disadvantaged.

This supports the broader goals of environmental justice by making sure federal funds are spent on Climate Action and Pollution Reduction projects that have a commitment to strong labor standards, creating stronger communities where worker, employer, and community needs are collectively met. Characteristics of a good job include strong wages and family-sustaining benefits; worker empowerment and neutrality with respect to union organizing and collective bargaining; work environments that promote worker health and safety; job security; equitable workforce development pathways and opportunities for career advancement; and supportive services, such as childcare and transportation, to support individuals that face barriers to employment; among others. When considering how to support job quality, EPA encourages applicants to review the eight [Good Jobs Principles](#) developed by the U.S. Department of Labor and Department of Commerce. The Department of Labor has produced several resources that help potential applicants understand the Good Jobs Principles and implement them through federal funding programs including: [Good Jobs in Federal Investments: A Toolkit for Employers, Workers, and Government](#); [Good Jobs Initiative Job Quality Check List](#); [Good Jobs in Federal Investments: Data and Reporting Appendix](#).

Grant funding for construction projects under this program is subject to Davis Bacon and Related Acts prevailing wage laws as provided in Section 314 of the Clean Air Act. Beyond this requirement, applicants are encouraged to articulate additional strategies they will use to deliver on the goals outlined above, including ensuring high labor standards and a diverse workforce to benefit the local community where the EPA funded work is taking place. These commitments should be concrete, specific, and measurable rather than vague statements, and may be integrated into EPA's agreement with the recipient through programmatic terms and conditions.

## Appendix F. Track I and II Outputs and Outcomes

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The term “output” means an environmental activity, effort, and / or associated work product related to an environmental / public health goal and objective that will be produced or provided over a period or by a specified date. Outputs may be quantitative or qualitative but must be measurable during the assistance agreement funding period.

The term “outcome” means the result, effect, or consequence that will occur from carrying out an environmental / public health program or activity that is related to an environmental / public health programmatic goal or objective. Outcomes may be environmental, behavioral, health-related, or programmatic in nature, but must be quantitative. They may not necessarily be achievable within the assistance agreement funding period.

Examples of expected outputs and outcomes for the Track I and II awards under this NOFO include but are not limited to the following as applicable depending on the strategies and projects in the application. Applicants may identify additional outputs and outcomes as relevant to their specific strategies and projects in their application.

### Track I Output and Outcome Examples

Strategy	Output Examples	Outcome Examples
<b>Climate Action Strategies</b>		
Strategy 1: Green Infrastructure and Nature-based Solutions	<ul style="list-style-type: none"> <li>▪ Coastal green infrastructure projects, including blue-green trails (#)</li> <li>▪ Green / complete streets, sidewalks, bus stops (#)</li> <li>▪ Green / cool roofs (#)</li> <li>▪ Area of impermeable surfaces replaced with vegetation (acres)</li> <li>▪ New parks and / or public green space developed (acres)</li> <li>▪ New shade tree canopy (square footage, # of shade trees planted)</li> <li>▪ Area under implementation of low tillage / composting practices (acres)</li> <li>▪ New community gardens and greenhouses (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Increased green space as measured by square footage of added greenspace</li> <li>▪ Increased resilience to extreme weather and climate conditions as measured by reduction in flash flooding events, improved groundwater recharge, and cooler ambient temperatures during heat waves</li> <li>▪ Increased community resilience as measured by reduced damage and recovery costs for infrastructure, property, and cultural resources</li> </ul>
Strategy 2: Mobility and Transportation Options for Preventing Air Pollution and Improving Public Health and Climate Resilience	<ul style="list-style-type: none"> <li>▪ New EVs, bikes / electric bikes, and other low-and-zero emissions vehicles that are available via carsharing / bike sharing programs (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Reduced air pollution from transportation (e.g., GHG reductions, reduced number of days with unsafe air quality for vulnerable populations)</li> <li>▪ Increased use of public transportation services and</li> </ul>



	<ul style="list-style-type: none"> <li>▪ Streets improved to encourage walkability, bike-ability, and transit use (#, miles)</li> <li>▪ EVs that can be used as backup power in lieu of diesel generators (#)</li> </ul>	<p>programs that promote electric vehicles, car sharing, and bike sharing</p>
Strategy 3: Energy-efficient, Healthy, Resilient Housing and Buildings	<ul style="list-style-type: none"> <li>▪ Home energy audits performed (#)</li> <li>▪ Air sealings completed (#)</li> <li>▪ Homes insulated (#)</li> <li>▪ Natural gas appliances replaced with electric equivalents (#)</li> <li>▪ Mobile homes retrofitted with solar panels and storage (#)</li> <li>▪ Electrification, weatherization, and HVAC upgrades / replacements of low-income houses, apartments, small businesses, and other community buildings (#)</li> <li>▪ Energy efficient home-heating appliances installed (#)</li> <li>▪ Homes or units converted to electric heating (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Lower consumption of home heating fuels (propane, heating oil, natural gas, and wood) and reduction in associated climate pollutants (e.g., black carbon, methane, CO<sub>2</sub>), as well as ambient and indoor emissions of Hazardous Air Pollutants and PM<sub>2.5</sub>.</li> <li>▪ Decreased incidence of asthma</li> </ul>
Strategy 4: Microgrid Installation for Community Energy Resilience	<ul style="list-style-type: none"> <li>▪ Renewable energy capacity installed (MW)</li> <li>▪ Battery storage installations (MWh)</li> <li>▪ GHG emissions reductions (ton CO<sub>2</sub>)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Enhanced resilience during extreme weather events as measured by fewer power disruptions</li> <li>▪ Increased number of homes connected to a resilient power source</li> </ul>
Strategy 5: Community Resilience Hubs	<ul style="list-style-type: none"> <li>▪ Space built or converted into a community resilient hub (square ft)</li> <li>▪ Disaster preparedness trainings delivered (#)</li> <li>▪ Stormwater management flood preparedness training delivered (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Enhanced physical safety during natural disasters as measured by the number of hospitalizations and lives lost among vulnerable populations</li> <li>▪ Increased community awareness of emergency preparedness</li> </ul>
Strategy 6: Brownfield Redevelopment	<ul style="list-style-type: none"> <li>▪ Impervious surface reduced (square footage)</li> <li>▪ Community meetings to involve impacted residents (#)</li> <li>▪ Green demolition activities to support adaptive reuse or new construction (#)</li> <li>▪ Shade trees planted (#) and new vegetation (square footage)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Square footage of space redeveloped for resilience purposes, such as heat-reducing shade</li> <li>▪ New economic opportunities created through the redevelopment of previously polluted land (e.g., number of business or low-income housing units)</li> </ul>

Strategy 7: Waste Reduction and Management to Support a Circular Economy	<ul style="list-style-type: none"> <li>▪ Waste diverted from landfills (pounds / tons)</li> <li>▪ Waste recycled (pounds / tons)</li> <li>▪ Food waste composted (pounds / tons)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Cleaner communities with less trash / waste on land and in waterbodies as measured by litter surveys</li> <li>▪ Reduced food waste and associated emissions as measured by weight of compost diverted from landfills</li> </ul>
Strategy 8: Workforce Development Programs for Occupations that Reduce Greenhouse Gas Emissions and Air Pollutants	<ul style="list-style-type: none"> <li>▪ Individuals in disadvantaged communities that participate in workforce training in sectors related to GHG emissions and air pollution reduction who are currently unemployed, under-employed, or face employment barriers (#)</li> <li>▪ People in disadvantaged communities hired and retained into high-quality jobs to reduce air pollution and GHG emissions based on participation in a workforce training program (#)</li> <li>▪ Individuals who receive wages / stipends and supportive services delivered to enable community members' participation in workforce training programs (# individuals receiving such wages / stipends)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Increased literacy among community members about environmental sectors and skills required to pursue these jobs</li> <li>▪ Increased number of high-quality workforce training programs, such as pre-apprenticeship and Registered Apprenticeship, in disadvantaged communities</li> <li>▪ Increased wages, benefits, job quality, and job security for participants in workforce training programs</li> </ul>
Alaskan-specific Climate Action Strategies	<ul style="list-style-type: none"> <li>▪ Renewable generation capacity installed (MW)</li> <li>▪ Fuel storage facilities repaired (#)</li> <li>▪ Greenhouses constructed (#)</li> <li>▪ Portable micro-water treatment systems installed (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Improved water and soil quality so water / land can be used for Alaskan Native traditional uses</li> <li>▪ Increased access to energy sources with low air pollution and carbon emissions</li> <li>▪ Protection of cultural resources including environmental habitats</li> </ul>
<b>Pollution Reduction Strategies</b>		
Strategy 1: Indoor Air Quality and Community Health Improvements	<ul style="list-style-type: none"> <li>▪ [Type of] trainings implemented (#)</li> <li>▪ Classrooms with air cleaners (#)</li> <li>▪ Houses / schools with upgraded / improved HVAC systems (#)</li> <li>▪ Homes in which moisture issues have been addressed (#)</li> <li>▪ Wood appliance upgraded or replaced (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Increased public and environmental health literacy</li> <li>▪ Decreased incidence of asthma symptoms as measured by doctor visits or school nurse visits for asthma symptoms</li> <li>▪ Reduced exposure to radon and risk of developing radon-induced lung cancer</li> </ul>
Strategy 2: Outdoor Air Quality and Community Health Improvements	<ul style="list-style-type: none"> <li>▪ Clean air zones or low-emission zones created (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Increased public and environmental health literacy</li> </ul>



	<ul style="list-style-type: none"> <li>▪ Abandoned oil / gas wells plugged (#)</li> <li>▪ Toxic play surfaces replaced (#)</li> <li>▪ Community monitoring and alert systems installed to alert households to increasing pollution levels (#)</li> <li>▪ Wildfire smoke preparedness trainings delivered (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Reduced exposure to PM, carbon dioxide, VOCs, ozone, nitrogen dioxides, and toxics.</li> <li>▪ Increased skill development and improvements in community capacity to independently assess air pollution reduction options</li> </ul>
Strategy 3: Clean Water Infrastructure to Reduce Pollution Exposure and Increase Overall System Resilience	<ul style="list-style-type: none"> <li>▪ Clean water fountains installed in schools / parks (#)</li> <li>▪ Full lead service lines replaced for low-income homes (miles)</li> <li>▪ Private wells tested for PFAS (#)</li> <li>▪ Stormwater management / flood preparedness trainings delivered (#)</li> <li>▪ Water efficiency systems installed (e.g., drought mitigation systems, rain capture installations) (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Decreased levels of water contamination and pollution as measured by boil water advisories, lead poisoning, or water quality monitoring results</li> <li>▪ Increased availability of clean, safe drinking water</li> </ul>
Strategy 4: Safe Management and Disposal of Solid and Hazardous Waste	<ul style="list-style-type: none"> <li>▪ Lead paint remediations completed (#)</li> <li>▪ Tires diverted from landfills / the environment to disposal facilities (#, weight)</li> <li>▪ Neighborhoods / cities / residents served through residential waste composting / chipping program (#)</li> <li>▪ Waste transfer, material reuse, and / or recycling stations installed in underserved communities (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Decreased exposure to toxics and hazardous chemicals</li> <li>▪ Reduced odors and pathogens</li> <li>▪ Increased residential waste composting</li> </ul>
Strategy 5: Eliminate Harmful Chemicals through Product Replacements	<ul style="list-style-type: none"> <li>▪ Conventional products replaced with Safer Choice-certified or other EPA recommended products (#, volume, customers impacted)</li> <li>▪ Units of PFAS food contact materials replaced (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Reduced exposure to hazardous chemicals for those who live and work in and near places with chemical use and application</li> </ul>
ANCSA-Specific Pollution Reduction Strategies	<ul style="list-style-type: none"> <li>▪ Homes served with micro-water treatment systems (#)</li> <li>▪ Planning documents and Environmental Information Document created (#)</li> <li>▪ Site assessments and initial cleanups completed (#)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Improved water and soil quality so water / land can be used for Alaskan Native traditional uses</li> <li>▪ Protection and preservation of cultural resources including environmental habitats</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Reduced exposure to harmful chemicals and pollutants on Alaskan Native lands through remediation of contaminated lands and buildings (acres of land, # buildings)</li> </ul>	
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**Track II Output and Outcome Examples**

**Outputs**

- New policies developed and implemented in response to community recommendations (e.g., through a new advisory council, participatory budgeting) (#)
- Community benefits agreements or memoranda of understanding signed (#)
- Number of community residents who complete a training that builds their capacity to participate in government processes (#)
- Amount of new funding allocated to benefit disadvantaged communities (dollars)
- Number of residents who participate in a community-based participatory research initiative that informs a government process and / or priority (#)
- Research products published with data reflecting community opinions and preferences (#)
- Number of educational forums and / or meetings held between governmental officials and community members (#)

**Outcomes**

- Increased involvement of individuals from disadvantaged communities in local, state, federal and other governmental environmental public processes
- Expanded knowledge of local, state, federal and other governmental environmental public processes among disadvantaged communities
- Stronger relationships and trust between disadvantaged communities and government entities on matters relating to environmental protection
- More transparent processes for governmental decision-making on environmental protection policies and greater governmental focus on inclusivity
- Increased accountability and community input into governmental decision-making on environmental protection policies
- More informed decisions made, and environmental actions taken, by government bodies to benefit disadvantaged communities
- Enhanced capacity in disadvantaged communities to be involved in local, state, federal, and other governmental environmental public processes
- Increased funding to enable disadvantaged communities to address environmental and climate justice issues
- New environmental or climate policies developed to be responsive to community needs



## Appendix G. Budget Template

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(This template is optional, and applicants may use a different format for the template).

<b>Category</b>	<b>Description</b>	<b>Total</b>
Personnel		
Fringe Benefits		
Travel		
Equipment		
Supplies		
Contractual		
Construction		
Other (separate by participant support costs, subawards, and other costs)		
Total Direct Costs (sum of the above categories)		
Indirect Costs		
Total Project Costs (sum of direct and indirect costs)		

### **Guidance for Budget Template**

The budget template is an attachment to the application and does not count toward the Project Narrative's page limit as described in Section IV of the NOFO. Applicants should include applicable rows of costs for each budget category in their budget template to accurately reflect the proposed application budget for each year of the grant. EPA provides detailed guidance on budget development in the [Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance](#), but applicants may use other forms instead of this template as long as total costs per category (and specific descriptions of costs) are included.

Applicants must itemize costs related to personnel, fringe benefits, travel, equipment, supplies, contractual costs (including acquisitions of intangible property), construction, and other costs (including subawards and participant support costs) as direct costs. Direct costs plus the indirect costs equal the total project costs. Descriptions of these cost categories are below. Applicants should be aware that if their projects include using federal funds to purchase goods, products, and materials on any form of construction, alteration, maintenance, or repair of infrastructure in the United States, they must comply with the Build America, Buy America Term and Condition if they are selected for an award.

**To facilitate consideration of an application for partial funding, EPA recommends that applicants separate costs for financial assistance in the program budget by project category, to the extent practicable.**

- **Personnel - List all staff positions by title. Give annual salary, percentage of time assigned to the project, and total cost for the budget period.** This category includes only direct costs for the salaries of those individuals who will perform work directly for the program (paid employees of the applicant organization as reflected in payroll tax records). Personnel costs do not include: (1) costs for services of contractors (including individual consultants), which are included in the "Contractual" category; (2) costs for employees of subrecipients under subawards or non-employee program participants (e.g., interns or volunteers), which are included in the "Other" category; or (3) effort that is not directly in support of the proposed program, which may be covered by the organization's negotiated indirect cost rate. The budget table must identify the personnel category type by Full Time Equivalent (FTE), including percentage of FTE for part-time employees, number of personnel proposed for each category, and the estimated funding amounts.
- **Fringe Benefits - Identify the percentage used, the basis for its computation, and the types of benefits included.** Fringe benefits are allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages. Fringe benefits may include, but are not limited to, the cost of leave, employee insurance, pensions, and unemployment benefit plans. If the applicant's fringe rate does not include the cost of leave, and the applicant intends to charge leave to the agreement, it must provide supplemental information describing its proposed method(s) for determining and equitably distributing these costs.
- **Travel - Specify the mileage, per diem, estimated number of trips in-state and out-of-state, number of travelers, and other costs for each type of travel.** Travel may be integral to the purpose of the proposed program (e.g., site visits); related to proposed program activities (e.g., attendance at community engagement meetings); or for a technical training or workshop that supports effective implementation of the program activities (e.g., consumer awareness activities). Only include travel costs for employees in the travel category. Travel costs do not include: (1) costs for travel of contractors (including consultants), which are included in the "Contractual" category; or (2) travel costs for employees of subrecipients under subawards and non-employee program participants (e.g., trainees), which are included in the "Other" category. Further, travel does not



include bus rentals for group trips, which would be covered under the "Contractual" category. Finally, if the applicant intends to use any funds for travel outside the United States, it must be specifically identified. All proposed foreign travel must be approved by EPA's Office of International and Tribal Affairs prior to being taken.

- **Equipment - Identify each item to be purchased that has an estimated acquisition cost of \$5,000 or more per unit and a useful life of more than one year.** Equipment also includes accessories necessary to make the equipment operational. Equipment does not include: (1) equipment planned to be leased / rented, including lease / purchase agreement; or (2) equipment service or maintenance contracts that are not included in the purchase price for the equipment. These types of proposed costs must be included in the "Other" category. Items with a unit cost of less than \$5,000 must be categorized as supplies, pursuant to 2 CFR § 200.1. The budget table must include an itemized listing of all equipment proposed under the program. If installation costs are included in the equipment costs, labor expenses shall be itemized with the detailed number of hours charged and the hourly wage. If the applicant has written procurement procedures that define a threshold for equipment costs that is lower than \$5,000, then that threshold takes precedence.
- **Supplies - "Supplies" means all tangible personal property other than "equipment." The budget detail should identify categories of supplies to be procured (e.g., laboratory supplies or office supplies).** Non-tangible goods and services associated with supplies, such as printing services, photocopy services, and rental costs must be included in the "Other" category.
- **Contractual - Identify proposed contracts, specifying the purpose and estimated cost for typical contractual services and disaggregating any costs for acquisitions of intangible property.** Contractual services (including consultant services) are those services to be carried out by an individual or organization, other than the applicant, in the form of a procurement relationship. The [EPA Subaward Policy](#) and supplemental frequently asked questions have detailed guidance available for differentiating between contractors and subrecipients. Leased or rented goods (equipment or supplies) must be included in the "Other" category. EPA does not require applicants to identify specific contractors, but if an applicant does so they must demonstrate that the contractor was selected in compliance with competitive procurement requirements in 2 CFR Parts 200 and 1500. Subcontracts are not subawards and belong in the "Contractual" category.

In the budget description, the applicant should list the proposed contract activities along with a brief description of the anticipated scope of work or services to be provided, proposed duration, and proposed procurement method (competitive or non-competitive), if known. Any proposed non-competitively / sole-source contracts more than the applicant's 2 CFR § 200.320(a) micro-purchase threshold (generally \$10,000) must include a justification. Note that EPA rarely accepts proposed sole source contracts for goods and services (e.g., consulting) that are widely available in the commercial market absent a copyright, patent, or equipment warranty requirement or similar restriction that establishes that only one source can provide the necessary good or service; unique qualifications or long-standing relationships with a grantee do not provide an adequate basis for a sole source contract. Applicants must provide the aggregate amount they propose to issue as acquisitions of intangible property as a separate line item in the "Contractual" category. Refer to the [EPA Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) for EPA's policies on competitive procurements and encouraging the use of small and disadvantaged business enterprises.

- **Other - List each item in sufficient detail for EPA to determine the reasonableness and allowability of the cost.** This category should include only those types of direct costs that do not



fit in any of the other budget categories including subawards, participant support costs, and additional costs (e.g., insurance, costs for acquiring or improving real property, rental / lease of equipment or supplies, equipment service or maintenance contracts, and printing or photocopying).

- **Subawards** - 2 CFR § 200.1 defines a subaward as “an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity.” 2 CFR § 200.1 defines a Pass-through entity as “a non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program” and a Subrecipient as “an entity...that receives a subaward from a pass-through entity to carry out part of a federal award; but does not include an individual that is a beneficiary of such award.” Identify each major subaward including those with the Collaborating Entities. Applicants must show the individual and aggregate amounts they propose to issue as subawards. Additional guidance is available in the EPA Subaward Policy and below.
- **Participant Support Costs** - 2 CFR § 200.1 defines participant support costs as “direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.” EPA regulations at 2 CFR § 1500.1(a)(1) expands the definition of participant support costs to include “[S]ubsidies, rebates, and other payments to program beneficiaries to encourage participation in statutorily authorized environmental stewardship programs.” Additional guidance is available in the [EPA Guidance on Participant Support Costs](#).

### **Indirect Costs**

If indirect costs are budgeted, indicate the approved rate and distribution base. Indirect costs are those incurred by the grantee for a common or joint purpose that benefit more than one cost objective or project and are not readily assignable to specific cost objectives or projects as a direct cost. Indirect costs must be based on a rate approved by the applicant’s cognizant federal agency, or the 10% de-minimus rate authorized by 2 CFR § 200.414(f). Additional indirect cost guidance is available in [Indirect Cost Guidance for Recipients of EPA Assistance Agreements](#) and in Section VI.u, “IDC Competition Clause,” of the [EPA Solicitation Clauses](#).

Notwithstanding this, indirect costs have been capped as described below based on a deviation approved per 2 CFR 200.414:

### **Limitation on indirect costs for grants and cooperative agreements**

- a. In general: Except as otherwise provided by statute, indirect costs charged against any grant and / or cooperative agreement awarded under this NOFO shall not exceed 20 percent of the total amount of the federal award.
- b. Exception: Subsections (a) and (c) shall not apply to Indian Tribes as defined in section 302(r) of the Clean Air Act who serve in the role of direct recipient and / or subrecipient under the program or to Intertribal consortia that meet the requirements of 40 CFR 35.504(a) and (c) even if the Intertribal consortia is eligible for funding as a Community Based Nonprofit Organization.
- c. Treatment of subawards: In the case of a grant and / or cooperative agreement described in subsection (a), the limitation on indirect costs specified in such subsection shall be applied to both the initial direct assistance award amount and any subaward of the federal funds provided under the initial assistance award so that the total of all indirect costs charged to each of the federal awards (i.e., both the initial direct assistance award amount and any subawards) funded under the initial assistance award does not exceed such limitation. As provided in 2 CFR 200.332(a)(2) pass-through



entities are responsible for ensuring compliance with the indirect cost limitation by their subrecipients.

Note: This limit does not extend to indirect costs on procurement contracts.

## Appendix H. Alaska Tribal Lands Target Investment Area

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As noted in Section II.B, this NOFO includes a Target Investment Area for projects benefitting Alaska Tribal lands that are defined as disadvantaged communities in Appendix A. Under this Target Investment Area, EPA is accepting applications that include projects focusing on the clean-up of contaminated lands conveyed through the Alaska Native Claims Settlement Act (ANCSA).

Applications submitted by eligible applicants including Alaska Native Villages (ANVs), Alaska Native Nonprofit Organizations, and Alaska Native Nonprofit Associations for the Alaskan Target Investment Area must include, like all other Track I applications, at least one Climate Action Strategy and at least one Pollution Reduction Strategy and meet the other Track I application requirements in Section I.G of the NOFO, to be eligible for funding. Applicants are not limited to a single project activity under a strategy and may select several project activities associated with a strategy. Note that the for-profit Alaska Native Corporations are not eligible to be Lead Applicants or Statutory Partners for this NOFO. The Climate Action and Pollution Reduction Strategies addressed in applications for the Alaskan Target Investment Area can address either the Climate Action and Pollution Reduction Strategies (and project activities referenced in Appendices C and D) in Section I.G, or any specific Alaskan ones described below under paragraphs 1 and 3. EPA strongly encourages applications that include Pollution Reduction strategy projects to clean up contaminated lands such as those conveyed through ANCSA as addressed in Section 1 below.

### **1. ANCSA-Specific Pollution Reduction Strategy and Associated Project Activities**

This section describes project activities specific to the assessment and cleanup of sites covered by the Contaminated ANCSA Lands Assistance Program. The specific requirements that apply to ANCSA cleanup projects are below.

ANCSA was enacted in 1971 to settle aboriginal claims to public lands through the conveyance of 46 million acres of land to Alaska Native regional and village corporations and the transfer of one billion dollars from the state and federal governments as compensation for lands which could not be returned to Alaska Native ownership. Many of the lands promised and conveyed to corporations pursuant to the settlement in ANCSA were contaminated. The contaminants on some of these lands—which include arsenic, asbestos, lead, mercury, pesticides, polychlorinated biphenyls, and petroleum products—pose health and other concerns to Indigenous Alaskans and communities and are present in quantities above state and federal clean-up levels, negatively impacting subsistence resources and hampering cultural, social, and economic activities.

In 2023, EPA initiated a new Contaminated ANCSA Lands Assistance Program (ANCSA Program) to assist with addressing contamination on lands conveyed pursuant to ANCSA and provide funding to (1) characterize, assess, and conduct planning and community involvement activities related to these lands and (2) to carry out cleanup activities at ANCSA sites contaminated at the time of conveyance. The statutory authority for the ANCSA Program (Public Law 117-328) states that recipients of grants awarded under the ANCSA Program may use the funding to “. . . supplement other funds provided by the Environmental Protection Agency through individual media or multi-media grants or cooperative agreements.”

#### **Eligible ANCSA project activities:**

- Conducting Planning and Developing Site Plans:
  - Planning and site plan development for individual contaminated sites.



- Where multiple sites are connected through location, infrastructure, or economic, social, and environmental conditions, planning and site plan development can take an area-wide approach for multiple sites. Applicants must demonstrate how work conducted at several sites will benefit the primary site selected for investment. Project Area requirements are outlined in I.D of the NOFO but may be waived for purposes of coordinated cleanup.
- Conducting Site Assessments and Related Activities:
  - Conducting site assessment and sampling activities
  - Developing a Health and Safety Plan, Quality Assurance Project Plan and / or Sampling Plan prior to conducting any environmental sampling and analysis (a requirement for any projects conducting sampling).
  - Submitting samples for analysis to an EPA accredited laboratory. Analytical costs from evaluating site samples.
  - Developing a report of the sample results and conclusions based on analysis (i.e., Conceptual Site Model, Assessment report, Site Inspection or Sampling Summary Report).
  - Supporting planning for future cleanup activities such as analysis of cleanup alternatives.
- Conducting Initial Cleanup Activities:
  - Developing a site cleanup approach and documenting the approach in a Site Cleanup Plan to include agreed upon cleanup endpoints, aligned with Alaska Department of Environmental Conservation (ADEC) cleanup process.
  - If necessary, procuring contract services to conduct cleanup activities such as contaminated material removal, sampling, or health and safety monitoring.
  - Conducting environmental confirmation sampling post-cleanup activities to determine if further action is required. If necessary, planning for next phase of site cleanup.
  - Developing a report documenting removal and / or cleanup activities.
- Conducting Community Engagement Activities:
  - As noted in Section I of the NOFO, all applicants are required to develop a Community Engagement Plan. Effective community engagement is vital to working effectively with Alaska Native communities. Therefore, for ANCSA-related cleanup projects, Community Engagement Plans should include community engagement activities and / or development of culturally sensitive protocols for project implementation of cleanup activities.
  - Costs of conducting community engagement activities, including training for workforce development, youth engagement, elder engagement in documentation of Traditional Knowledge, and other costs associated with meaningfully engaging the community in the project can be included in the proposal budget.
- Compiling Information to Use to Comply with NEPA
  - The projects funded under this NOFO do not require Environmental Information Documents (EID) because EPA awards under this NOFO are not subject to the National Environmental Policy Act (NEPA), under Section 7(c) of the Energy Supply and Environmental Coordination Act of 1974 (15 U.S.C. 793(c)(1)). However, applicants may seek funding to prepare EIDs as needed to comply with NEPA in connection with other federal grant-funded projects in Alaska. EPA awards under the ANCSA program, for example, are subject to NEPA, as are programs funded by other federal agencies.

**Additional Eligibility Requirements for ANCSA-related projects and activities:**

Applicants proposing ANCSA-related cleanup projects must provide the following documentation of eligibility in their application. Failure to do so may render the application ineligible for funding. Specifically, applicants must provide the following site-specific information for where the cleanup activities will be performed, demonstrating that the site:

- was conveyed pursuant to ANCSA;
- was contaminated by hazardous substances, pollutants, contaminants, or petroleum at the time of conveyance; and
- is listed on the interim EPA inventory of Contaminated ANCSA Lands (for more information on EPA's interim inventory and program related to cleaning up contaminated lands conveyed pursuant to ANCSA, visit EPA Region 10's [website](#)).
- If the applicant is not the owner of the contaminated site(s) to be addressed, EPA will require proof that the landowner will provide access to the site and supports taking action to address contamination.

## 2. **General Alaskan Pollution Reduction Strategies**

In addition to the ANCSA land contamination projects identified above, applicants for the Alaskan Tribal Lands Target Investment Area may include Pollution Reduction Strategies as identified in Section I.G of the NOFO.

## 3. **Alaska-Specific Climate Action Strategies**

Below are examples of additional Alaska-specific Climate Action Strategies and project activities that may be included in applications for the Alaskan Tribal Lands Target Investment Area, which are in addition to the Climate Action Strategies described in Section I.G of the NOFO.

- Community energy resilience, which may include activities such as:
  - Multi-energy systems including renewable (solar, wind, etc.) and traditional (bulk fuel) sources to increase resilience during extreme events and support a clean energy transition.
  - Power system projects, including renewable energy projects, and the construction, repair, and maintenance of fuel storage facilities in rural areas.
- Improving human health and climate resilience, which may include activities such as:
  - Construction of greenhouses that enable sustainable food growth that can promote healthy foods, food accessibility, and food availability.
  - Food storage facilities to enable sustainable access to traditional foods to support places where permafrost degradation is destroying traditional ice cellars. New food storage facilities may be constructed to support the access and availability of traditional foods. Selection of this project component must include a permafrost mitigation strategy.
  - Projects to support new and improved access points to traditional food resources, such as construction of new fishing docks or river / lake boat ramps to allow for improved fishing opportunities in places that have a high reliance on traditional foods, where climate change has degraded access and availability of food sources.
- Permafrost degradation management strategies that may include strategies such as:
  - Source water protection (impacts from landfills, thawing of permafrost, and potential impacts to traditional drinking water sources as well as established drinking water systems).
  - Portable micro-water treatment systems applicable to those impacted by emergencies which impact drinking water systems, with the ability to treat water until system repairs are complete or new systems built.



- Manage and monitor contamination impacting land, food, and water backhaul / removal of waste materials not suitable for disposition in permitted landfills in Alaska.
- Climate emergency management and response strategies that may include activities such as:
  - Purchase of emergency response cargo containers with materials ready to deploy, including four-wheeler, snowmachine, communications, temporary office location, boat, oil spill response materials, smoke management equipment, etc.
  - Development of emergency alert and warning systems for wildfires, flooding and other emergencies stemming from climate change.
- Nature-based resilience strategies that may include activities such as:
  - Restoration of natural systems to help protect coastal communities from the impacts of storms, floods, and other natural hazards.
  - Storm damage prevention and reduction, coastal erosion, and ice and glacial damage stemming from climate change.