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Equitable Community Revitalization Grant ECRGathering & ECRGrowing Feedback Report and Call to Action for Round 3

August 14, 2023

Equity.

Community.

Revitalization.

You, our stakeholders, are well aware that these three concepts are the cornerstones of our grant. These are the principles that guide every aspect of our decision making. This is the reason why we made the draft version of the Equitable Community Revitalization Grant (ECRG) Round 2 guidelines available for your review. We held four “[ECRGathering](#)” open meetings, solicited dialogue through our [ECRGathering form](#), and convened one-on-one ECRGrowing conversations to learn how this extraordinary funding can be used to transform your community and uplift the people of California.

We are indebted to all of you who took the time to share ideas, issues, and feedback on ECRG. Learning about your challenges and your hopes have

allowed us to deepen our lens on how we can use this funding to shape change, improve lives, and elevate people in our most vulnerable communities.

Your input was used to make enhancements to the version of the guidelines shared in April 2023, and are reflected in the final version of the Round 2 ECRG Guidelines. A summary of how your feedback influenced our approach for the final version, launched on August 14, 2023, is included in this letter.

CALL TO ACTION

Your thoughts, ideas, and entreaties remain under consideration as we continue to develop our approach for ECRG Round 3, which is currently the *last round* for which we have funding.

We hope that you will take the time to share your thoughts, ideas, and the aspirations you have for your community. We need to learn how this precious funding can be better used to revitalize the lives of people who live, work, play, and learn in our most vulnerable towns and cities.

We will keep the [ECRGathering](#) form open through the end of October and continue to solicit feedback for both ECRG Round 3. In addition to using the ECRGathering form, you may also share your feedback by:

1. Contacting our Brownfield Development Specialist, Doris Nguyen, at Doris.Nguyen@dtsc.ca.gov to set up a one-on-one **ECRGrowing** meeting for mid-September through late October
2. Joining us in-person at the **California Land Recycling Conference and Training** in Carson from September 26th through September 28th, 2023 to set up a face to face meeting with our staff
3. For our ECRGrantees and their environmental consultants, please join us at the invitation only **ECRG Summit** at the [California Land Recycling Conference](#) and Training, for a group discussion and ideate on how we enhance our investment in your community and create meaningful change

Changes Made Based on ECRGathering & ECRGrowing Feedback

The Office of Brownfields added, emphasized, or reconfigured the following measures in the final Round 2 ECRG Guidelines and developed support resources as an outcome of our ECRGatherings and ECRGrowing conversations:

1. **Stringent Environmental Decision-Making Requirements:** ECRG relies on the environmental regulatory oversight agency to guide assessment, investigation, and cleanup decision making. However, in order to emphasize the “equity” aspect of the “Equitable Community Revitalization Grant” and in recognition of community priorities and preferences, ECRG requires that cleanup approach for sites planned for housing, schools, hospitals, health clinics, or day care centers, do not rely on the use of land use covenants, deed restrictions and/or long-term operation and maintenance for future use. For these sites, DTSC recognizes that the cleanup may not be completed within the two-year ECRG Agreement. However, ECRG could fund the initial two years of cleanup implementation. The concept of “community considerate cleanups” will be further expanded for Round 3.
2. **Community Considerate Cleanups (C3):** The Office of Brownfields has established an ECRG Treatment Technology Council (ECRG-TTC), a multi-disciplinary team of internal and external subject matter experts who will work to reframe the cleanup alternative evaluation approach for cleanup plans funded by ECRG. The ECRG-TTC will encourage ECRGrantees and applicants to more seriously evaluate onsite treatment technologies and to innovative cleanup approaches while fostering a greater consideration of the impacts that cleanups may have on communities. The desired outcome of the ECRG-TTC is to highly encourage the development of community considerate cleanup or “C3” approaches, which are cleanups designed through the lens of the people who live, work, play, and learn in the community where the cleanup will take place and where the waste might be taken for treatment and/or disposal.
3. **Clarifying Tribal Provisions:** Special considerations that ECRG will offer to tribes are consolidated in a single section of the ECRG Round 2 Guidelines, Section 2.2.
4. **Affordable Housing Eligibility:** The most consistent feedback we received was associated with the requirement that the site be located in an area where the CalEnviroScreen 4.0 Score (CES 4.0 Score) is 75% or greater or the CES Poverty Percentile must be 50% or greater.

The new provisions we have included allow for the reuse of 100% affordable housing that (meeting the Low-Income Housing Tax Credit requirement where 40% of the units are at or below 60% AMI and may have units up to 80% AMI, if the average of all the units is at or below 60% AMI) anywhere in our state where affordable housing is needed.

This adjustment aligns with the approach that the California Department of Housing & Community Development has adopted when funding affordable housing infrastructure.

5. **Services Associated with Affordable Housing Eligibility:** In addition to allowing for 100% affordable housing regardless of CES score, essential services that are co-located with the affordable housing will also be an eligible reuse.
6. **CERCLA Liability Defense:** We have simplified the process for applicants to determine whether or not a CERCLA liability defense is required. Using Table 1 of the [Eligibility Self-Check Tool](#), applicants can first identify the “box” that applies to them and then proceed with the application.
7. **[Eligibility Self Check Tool](#):** To aid in application preparation for Round 2, we developed and updated an “[Eligibility Self-Check Tool](#)” that guides the reader through all the eligibility requirements and includes questions that help establish the “CERCLA Liability Defense” requirements. Based on your feedback, this tool has been simplified for greater ease of utilization.
8. **Eligibility of ECRGrantees:** In order to be eligible, our Round 1 cohort of ECRGrantees needed to demonstrate significant progress on their current ECRG Tasks by having submitted reimbursement requests of at least 70% of their current ECRG funding, for all grants, if they have more than one, by the application deadline. This was another area where we received consistent comments from ECRGrantees. The adjustment we made in our approach is as follows:
On a case-by-case basis, the DTSC Portfolio Manager may provide a waiver if:
 - a. At least 70% of expenses have been incurred, but not all reimbursements have been requested

or

- b. Different departments within a larger organization can demonstrate distinct workloads and capacity to take on an additional grant without impacting the management success of all current grants and still follow the requirements that the organization named as the applicant is consistent with the requirements stated in the final ECRG Round 2 Guidelines and will fulfill all ECRG Agreement provisions and signatory requirements
9. **ECRGrantees Agreement Closeout Period:** Upon the termination of the grant agreement after the two-year funding term, ECRGrantees will have 6 months to process and submit reimbursement requests instead of two months.
10. **ECRG Payment Provisions:** Updates have been made to clarify that ECRG does not require invoices to be paid prior to submission for reimbursement.
11. **Clarifying Updates to Guidelines:** Countless changes have been made to increase ease of readability and to ensure that the eligibility requirements are presented in a manner that is easy to understand. In addition, we have used color coding for increased visual appeal and reading ease.
12. **ECRG website:** We continue to share information and recorded presentations on the [ECRG website](#) as a hub for grant related documents, information, and updates.

It is of vital importance that we continue to educate ourselves about your vision for Round 3. Your feedback is essential to the development of the strongest ECRG possible.

We appreciate your partnership in making ECRG a force for good as we strive to uplift our communities together.

Maryam Tasnif-Abbasi, on behalf of the Office of Brownfields