

**ASTSWMO Brownfields Focus Group
2020 State Brownfields Program Analysis**



**Brownfields Focus Group
CERCLA and Brownfields Subcommittee
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ASTSWMO Brownfields Focus Group 2020 State Brownfields Program Analysis

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I. SUMMARY

A brownfield is a property where the expansion, redevelopment, or reuse of the property may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

Brownfield properties exist in every State and Territory (hereafter, State) and as a result, all States have brownfield programs to help assist in the redevelopment of these properties. State programs range from large long-established programs to small emerging programs, and everything in between. Although common elements exist between State programs, each is unique. Being able to learn how other programs are structured, how they deal with various challenges, and what services they provide can help States improve their own programs and become more innovative without having to reinvent the wheel.

To help facilitate that sharing of information, the ASTSWMO Brownfields Focus Group undertook a research project to gather and share data from all State brownfield programs. The project began with the development of a research tool that would capture the key components of State brownfield programs. The tool was provided to every State brownfield program and consisted of 31 questions (see Appendix A), which can be broken down into the following general categories:

- State Voluntary Cleanup Programs
- Institutional Controls
- Comfort Letters
- Beneficial Reuse of Contaminated Fill
- Tracking Land-Use Following Development
- Cleanup Criteria
- Brownfield Staffing
- State Program Functions
- State Non-Financial Incentives
- State Financial Incentives

In total, 52 States participated in the project, resulting in a robust data set that was a true reflection of the nation's brownfield programs. A summary of the results is provided throughout this report.

II. STATE/TERRITORY VOLUNTARY CLEANUP PROGRAMS

Voluntary Cleanup Programs (VCPs) are used by most States to encourage the cleanup of contaminated sites. Determining who utilizes this tool and how, will help programs to make better informed decisions and provide opportunities for program improvements.

To gain an understanding of how States use VCPs, the research tool asked a series of questions focused on this issue, starting with whether a State had a VCP or similar program. The remaining questions focused on VCP eligibility requirements, if and how States charge for participation in the program, what the participants receive upon completion, and if Financial Assurance Mechanisms (FAMs) are required for long term Operation & Maintenance.

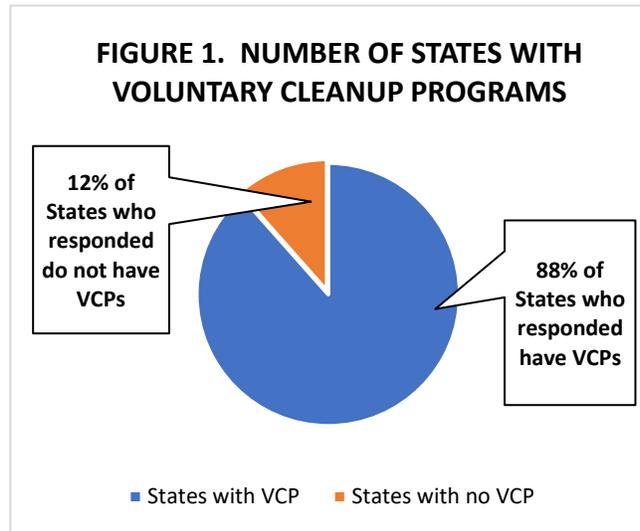
The data was compiled and analyzed, and a summary of the findings is discussed below.

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1. Of the States responding, eighty-eight percent (88%) offer voluntary programs where enrollees conduct assessment, risk evaluation, and cleanup (Figure 1). In these programs, VCP enrollees receive some type of regulatory sign-off or closure, usually with covenants or no further action certificates on title and deed.

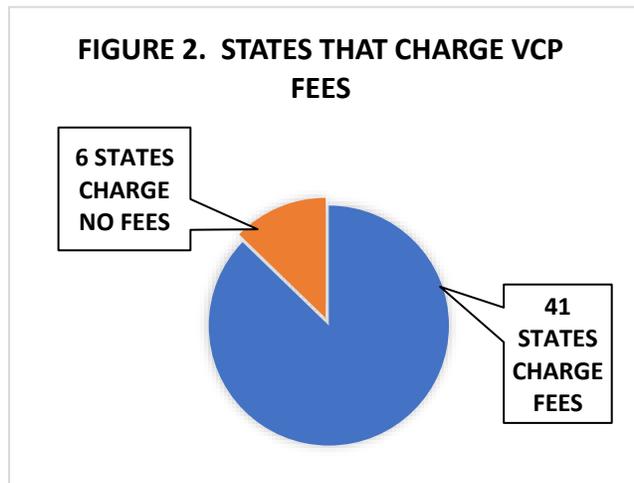
2. Of the twelve percent (12%) of States that do not have a VCP, they reported a variety of alternatives. These included:

- AK – regulatory, enforcement program
- HI – offers a Brownfield program
- MI – self implemented program
- NJ – Licensed State Remedial Professionals Program
- ND – offers liability exemptions
- SD – spill response program
- VI – currently building a VCP



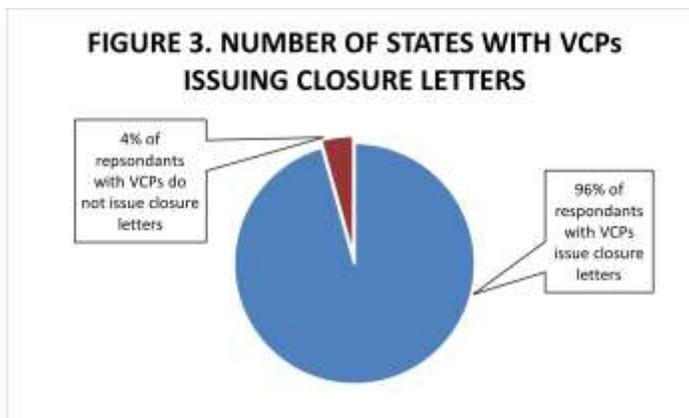
3. While participation in a State’s VCP is at the discretion of the enrollee, it is not a free program. Along with paying for the required environmental restoration, seventy-nine percent (79%) of States charge a fee for application and/or State oversight. The form of these payments varies significantly from State to State. Virtually no two States have exactly the same fee structure however, they tended to fall within one of four general categories:

- Flat Fees: Ranged from \$105 to \$30,000
- Flat Fee plus State oversight at an hourly rate: Flat fees ranged from \$550 to \$2,500, hourly rates ranged from \$55 to \$100/hour
- State oversight at an hourly rate: Hourly rates ranged from ‘hourly technician fee’ to \$125/hour
- Flat application fee plus State oversight at a flat fee: Application fees ranged from \$250 to \$750, oversight flat fees ranged from \$2,500 to \$25,000



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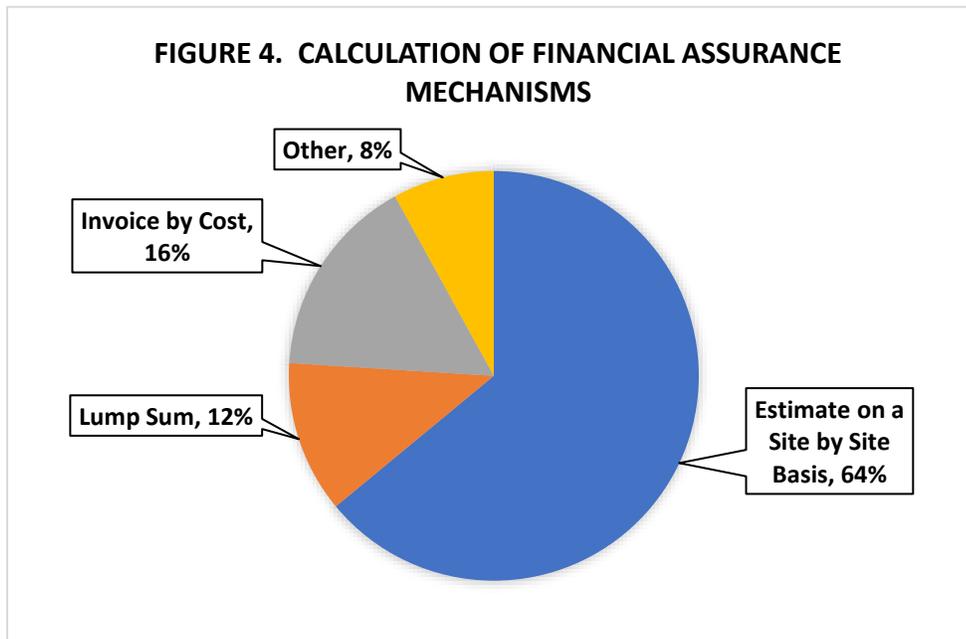
4. Acknowledgment by the State of an approved project conclusion appears to be the key for a successful VCP. This is supported by the fact that ninety-five percent (95%) of States with VCPs provide VCP enrollees with some type of documentation of closure. Although the name and type of this documentation vary from State to State, the most common documents issued are either a “Certificate of Completion” or a “No Further Action Letter”. Other similar reporting documents were titled “Limitation of Liability Letter”, “Covenant Not to Sue”, “Closure Letter”, and “Letter of Concurrence”.



5. While most States appear to encourage enrollment in a VCP, eligibility is not guaranteed. Sixty-five percent (65%) of States with a VCP reported at least one element that would prohibit an entity from enrollment in the program. The most common issues that prohibit VCP participation include:
- Enforcement action by a State or federal agency
 - The site is high risk
 - The site is covered by another program such as RCRA, CERCLA, or the State’s leaking underground storage tank program
6. In addition to the situations described above where a site is not eligible to participate in a VCP, about half of the States reported that there are additional circumstances that could keep a site from reaching completion, making participation in a VCP difficult. The five most common barriers to completion of a VCP include:
- Applicant qualifies as having no ability to pay for either cleanup or State oversight costs
 - Failure to complete required corrective action in a specified time period
 - Highly complex site
 - The responsible party is barred from participation by program criteria
 - Applicant has an inability to address off-site contamination due to site access refusal
7. When asked about reducing or removing restrictions on their VCP, only seven (7) States indicated that have they considered this action. Those considerations include the following:
- Exemptions when off-site access is denied
 - Providing additional time when groundwater cleanup is required
 - A separate program was created to provide an easier path to comfort letters
8. Only two States reported that they had a financial cap on the VCP. These include:
- The VCP does not cover cleanup costs
 - Some Brownfield incentives may have a cap, but there is crossover between programs so some Brownfield incentives may be used in the VCP

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9. For sites that have completed the VCP requirements and subsequently require a financial assurance mechanism (FAM), States were asked how they estimated the long-term costs. Approximately one half of the States with a VCP require a FAM for covering long term maintenance costs. Of those requiring a FAM, the amount required for the FAM is determined in a variety of ways that include estimating on a site-by-site basis, providing a lump sum, or invoicing costs as they are incurred (Figure 4).



VCP TAKEAWAYS:

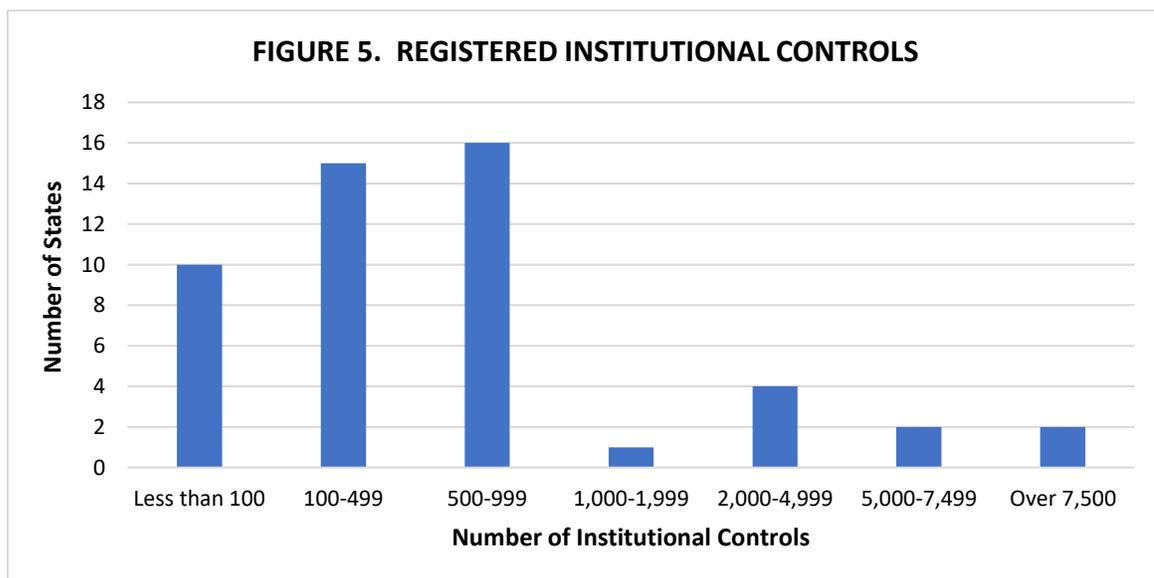
- The majority of States have developed a VCP to facilitate timely and cost-effective cleanups.
- Of the States without a formal VCP, only one reported a strictly regulatory program as the only alternative. A logical conclusion might be that States see the value in a VCP to expedite cleanups.
- There is a cost to participate in a VCP.
- Enrollees want some form of acknowledgement from the State when they are done.
- Participation in the VCP is not guaranteed. Eligibility restrictions associated with both the applicant and the site are common. Examples include applicants with active enforcement orders or that are chronic violators, sites that are highly complex, are failing to complete work in a timely fashion, or that have off-site migration issues that cannot easily be addressed.
- For States that require a FAM, the majority estimate costs on a site by site basis, likely due to the extreme variation in costs based on site conditions.

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III. INSTITUTIONAL CONTROLS

Institutional Controls (ICs) and Land Use Restrictions are an important tool in managing environmental risk. They are used in varying degrees by State programs. The research tool looked first at how many ICs each program had. From there, the questions focused on how they were monitored, the frequency of the monitoring, and how programs funded their monitoring activities. The results are summarized below.

1. The number of ICs a program has varies considerably by State (Figure 5). Michigan and New York reported that they have between 5,000 and 7,499 registered institutional controls and New Jersey and Wisconsin reported that they have over 7,500 registered institutional controls. Ten States reported that they have less than 100 registered ICs.



2. Inspection frequency varies among State programs and can be based on the type of IC, risk, closure documents, or long-term operation and maintenance specifics. Approximately forty percent (40%) of the States surveyed inspect their registered ICs every one to five years, while approximately twenty percent (20%) of State programs do not perform regular inspections of registered ICs. Several States only conduct inspections when they have adequate time and staff.
3. Most States use more than one method to monitor engineering and institutional controls (ECs and ICs). Seventy-two and a half percent (72.5%) of the States that responded use more than one method for tracking ECs and ICs. Idaho, Illinois, Indiana, Maine, North Carolina, Washington, and West Virginia utilize at least four methods to track ICs. The most common methods that States use to monitor ECs and ICs are through inspections performed by landowners, responsible parties, or other external stakeholders and through inspections performed by the States themselves. These methods are used by 75-78% of the States surveyed. GIS tools are used to monitor ECs and ICs by thirty-two percent (32%) of the States surveyed and Call 811 (or equivalent) is used by only 9%. Other methods used by States include custom tracking databases provided by Terradex, and random audits.
4. The data revealed that fifty percent (50%) of the States surveyed use their 128(a) Grant to fund the inspection and monitoring of engineering or institutional controls. Of the States surveyed,

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twenty-one percent (21%) fund the inspection and monitoring through State revenue. Only eleven percent (11%) of the States surveyed fund the inspections and monitoring through the payment of a one-time fee when the environmental covenant is filed. Several States fund the inspection and monitoring through cost recovery funds and several bill the responsible party/applicant annually to cover these costs.

IC TAKEAWAYS:

- The number of ICs and their inspection frequency varies widely by State. Roughly eighty-two percent (82%) of all States have less than 1,000 ICs and forty percent (40%) of States inspect their ICs every 1 to 5 years.
- As most States use 128(a) funds for inspection and monitoring of engineering and institutional controls, the availability of 128(a) funds can significantly impact the ability of States to perform regular monitoring. An increase in 128(a) funding to provide programs with more staffing would improve a State's ability to monitor and adequately inspect ICs.

IV. COMFORT LETTERS

A common tool utilized in the redevelopment of contaminated properties is the comfort letter. They may have different names in different States, but the purpose is mainly the same: to provide some level of liability protection for a property owner. The research tool first asked if agencies provided some form of a comfort letter. For those that did, further questions focused on the recipient's use of the comfort letters, the process of reviewing the data/information provided for the issuance of the letter, and whether enrollment in the VCP is required for a letter to be issued. The results are summarized below.

1. Sixty-one percent (61%) of agencies provide some form of comfort or status letter. The majority (77%) of these letters are provided to assist with financing and other activities associated with property transactions.
2. Of those who issue letters, thirty-nine percent (39%) require enrollment in the VCP, before providing a comfort letter, while fifty-seven percent (57%) do not. Of the agencies that do not require VCP enrollment before providing a comfort letter, sixty-nine percent (69%) do not charge a fee to provide the letter.
3. Some States have gotten creative on when to issue these letters, since timing can often be an issue. Creative approaches include:
 - Issuing a letter once there is concurrence that corrective action is complete, even if the initial submittal/documentation is not complete. This approach is based on the condition that the recommended modification/edits are subsequently incorporated and submitted.
 - Retroactive approvals if review cannot be completed within the timeframe needed.

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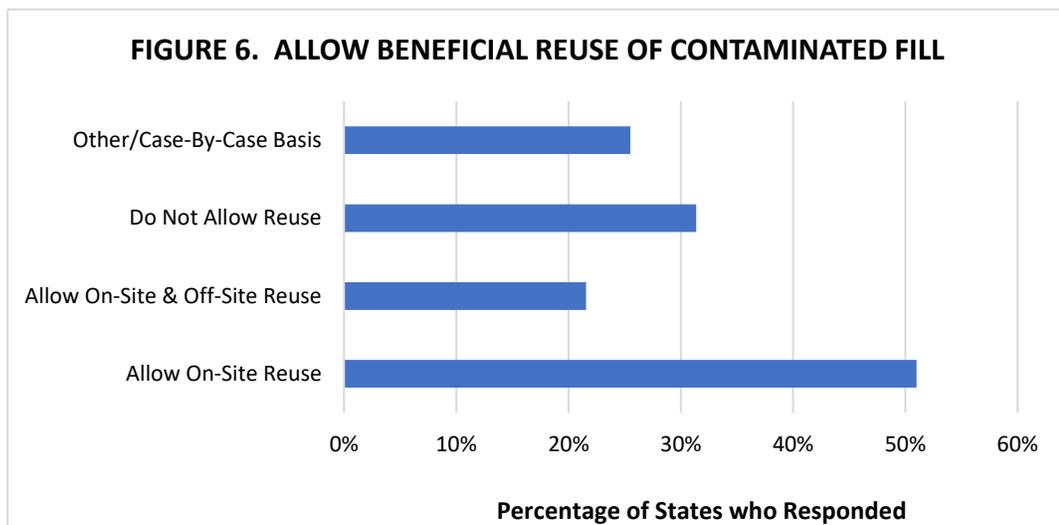
COMFORT LETTER TAKEAWAYS:

- The majority of States provide a comfort letter or equivalent to provide liability protection to a property owner.
- Comfort letters are most often provided to assist with property transactions.
- Because timing of these transactions is often crucial, several States have identified creative approaches to allow these letters to be issued in a faster timeframe that will help to facilitate redevelopment.
- Most States do not require VCP enrollment in order to obtain a comfort letter.

V. BENEFICIAL USE OF CONTAMINATED FILL

The movement and reuse of contaminated fill material both on- and off-site is an activity often proposed on brownfield redevelopment projects. The ability to relocate contaminated material depends on what the State regulations allow. The research tool specifically asked States if they allowed for the re-use of contaminated fill 1) on the property it was generated from and 2) to be moved to another property for reuse.

Results found that the on-site re-use of contaminated fill was allowed in the majority (51%) of the States, while approximately twenty percent (20%) allow for both on-site and off-site re-use. Reuse of contaminated fill is not allowed in thirty percent (30%) of the States, while several (25%) indicated that the reuse was evaluated on a case-by-case basis or some other alternative. A summary of the results is shown in Figure 6.



BENEFICIAL REUSE OF FILL TAKEAWAYS:

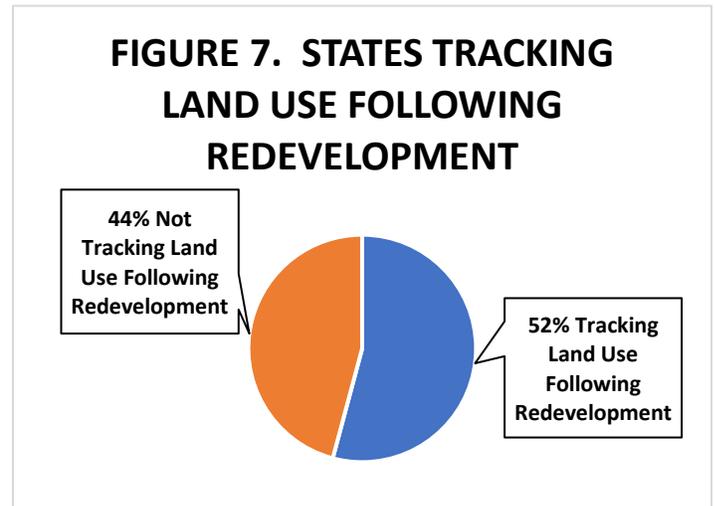
- Although the majority of States allow for the on-site reuse of contaminated fill material, moving contaminated fill off-site for reuse on another property is not as widely accepted.

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VI. TRACKING LAND USE FOLLOWING REDEVELOPMENT

State programs are typically involved in the planning and early stages of the brownfield redevelopment process. Once the brownfield condition is addressed, agency involvement subsides. This often results in the agency not seeing the end result of the project. States were asked if they tracked the land use after the redevelopment occurred. The results are summarized below.

1. Approximately forty-four percent (44%) of States reported that they do not track land use after the redevelopment of a brownfield site, while fifty-two percent (52%) reported that they do.
2. The most common method of tracking is the use of the EPA ACRES database. States also reported the following methods of tracking land use: Return on Investment (ROI) surveys, annual land use certifications, and required annual reporting connected to institutional controls tracking.



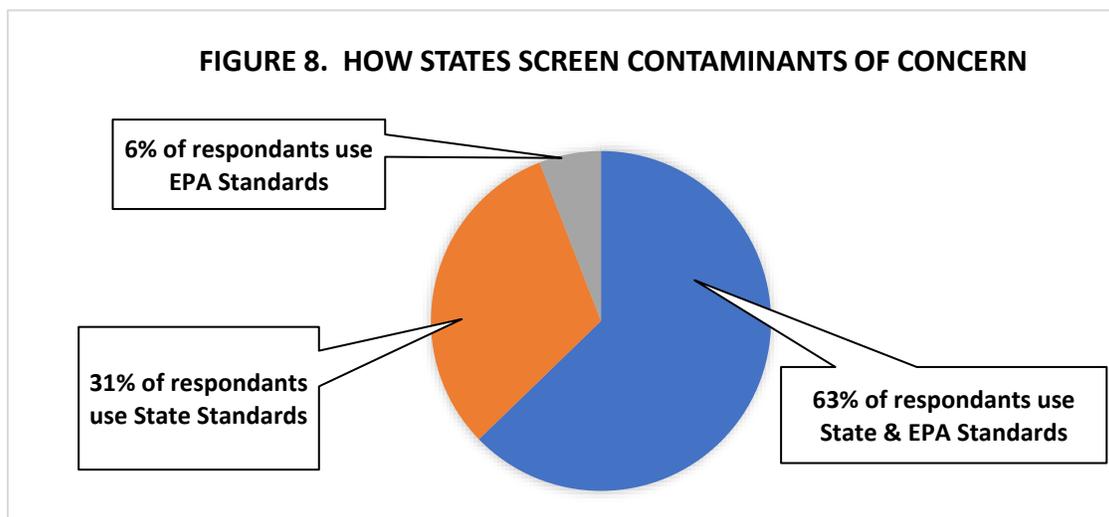
LAND USE TRACKING TAKEAWAYS:

- For projects that utilize EPA funds, short-term land use tracking occurs by entering data into the ACRES database.
- A large portion of States do not track land use following redevelopment, which likely means States are not performing land use tracking on projects that do not use EPA funding.
- It is likely that long term tracking of land use on all projects (both EPA and State Funded) is not taking place as often as it should.
- Although this metric is very important in helping to promote and sustain funding for these programs, it takes staff time to follow up and many State programs are facing funding and staffing limitations that make this difficult.

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VII. CLEANUP CRITERIA

Cleanup and brownfield programs are based on reaching an established regulatory end point and/or adequately addressing the risks at a property. This is controlled by the State cleanup criteria. How States establish this criteria and what criteria they use differ. To understand the differences, States were asked if they used State based standards, EPA standards, or a combination of the two. The results are summarized below.



1. As shown in Figure 8, the majority of States (63%) use a combination of State and EPA standards, while thirty-one percent (31%) use State standards alone. Only 6% of States use strictly EPA standards.

CLEANUP CRITERIA TAKEAWAYS:

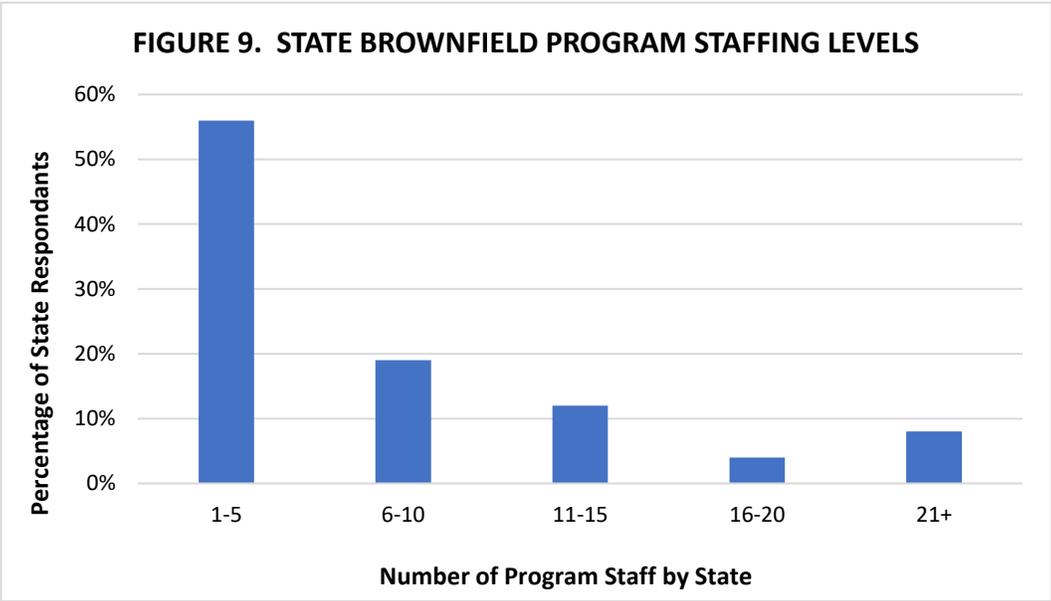
- Most States have some form of State derived cleanup levels/criteria.
- Because development of these criteria is complicated and time consuming, it would be helpful for States that are developing or updating criteria to have easy access to how other States have navigated this issue, including the equations, inputs, and assumptions used.

VIII. BROWNFIELD STAFFING

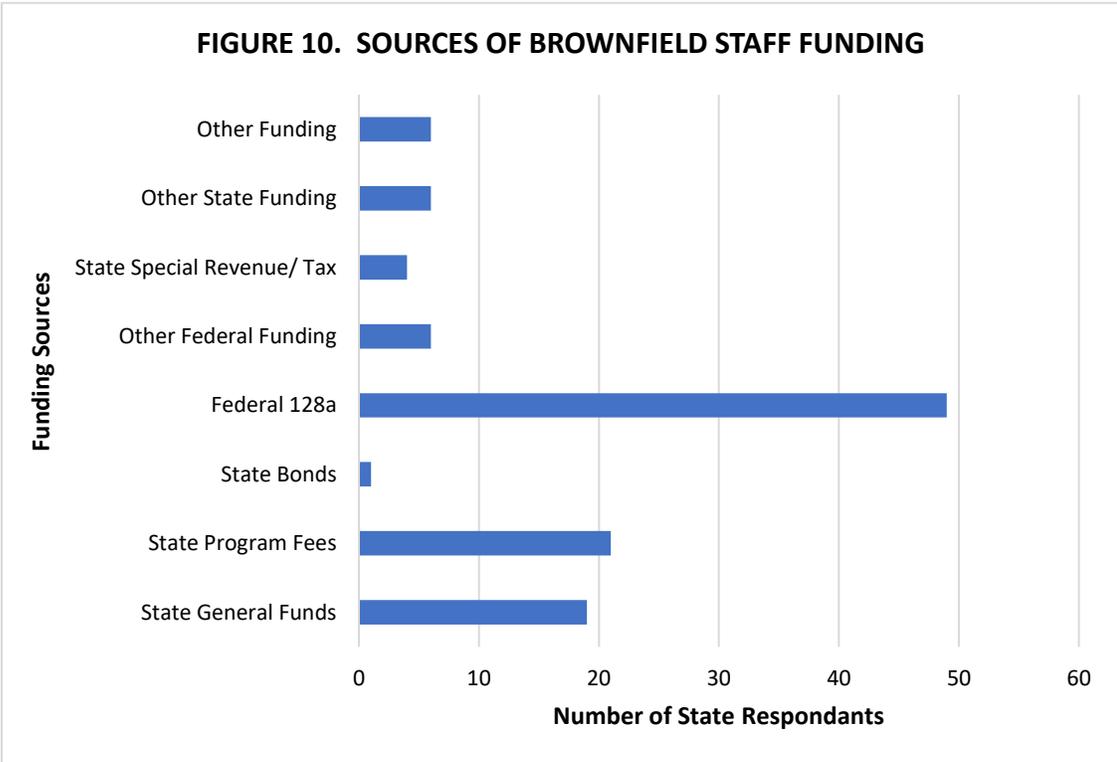
The size and responsibilities of State Brownfield programs differs considerably, ranging from a staff of 1 to a team of over 20. The research tool asked each program to identify staffing numbers and how the staff is funded. The results are provided below.

1. Figure 9 shows the distribution of staffing levels found in each State program. The results showed that the majority (56%) of State brownfield programs have 5 or less staff, while seventy-five percent (75%) have 10 or less, and twenty-three percent (23%) have more than 10 staff. Approximately 8% of the programs have more than 20 brownfield staff.

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- 2. Almost all States (96%) use Federal 128(a) to fund staff. Many also fund staff through State General Funds (37%) or State Program Fees (41%) or sometimes both. Several States have funding for staff provided by an environmental fund, hazardous substance, or gas tax. Figure 10 summarizes the various funding sources used by State programs for staffing.



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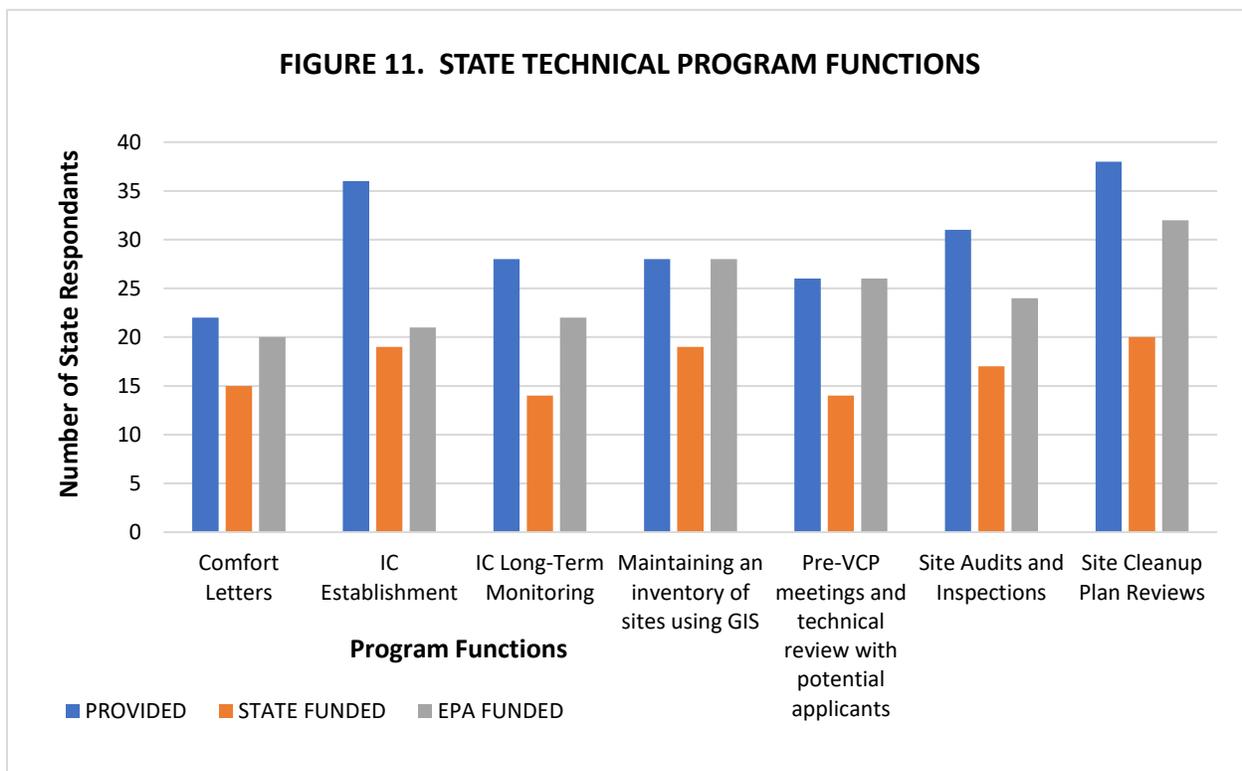
BROWNFIELD STAFFING TAKEAWAYS:

- The majority (57%) of State brownfield programs have less than 5 staff. This highlights that a relatively small investment in staffing, can result in significant environmental and economic impacts in our communities.
- Nearly all States support their staff with 128(a) funding. This shows the importance of 128(a) funding to brownfield programs nationwide. Increased funding to support additional staff would be a sound investment.

IX. PROGRAM FUNCTIONS

Brownfield program functions can be broken down into two main categories, technical and outreach. Within each of those categories there are a number of activities that take place to help a program achieve its goals. The research tool looked at both areas and tried to identify what functions each State provided how those functions were funded.

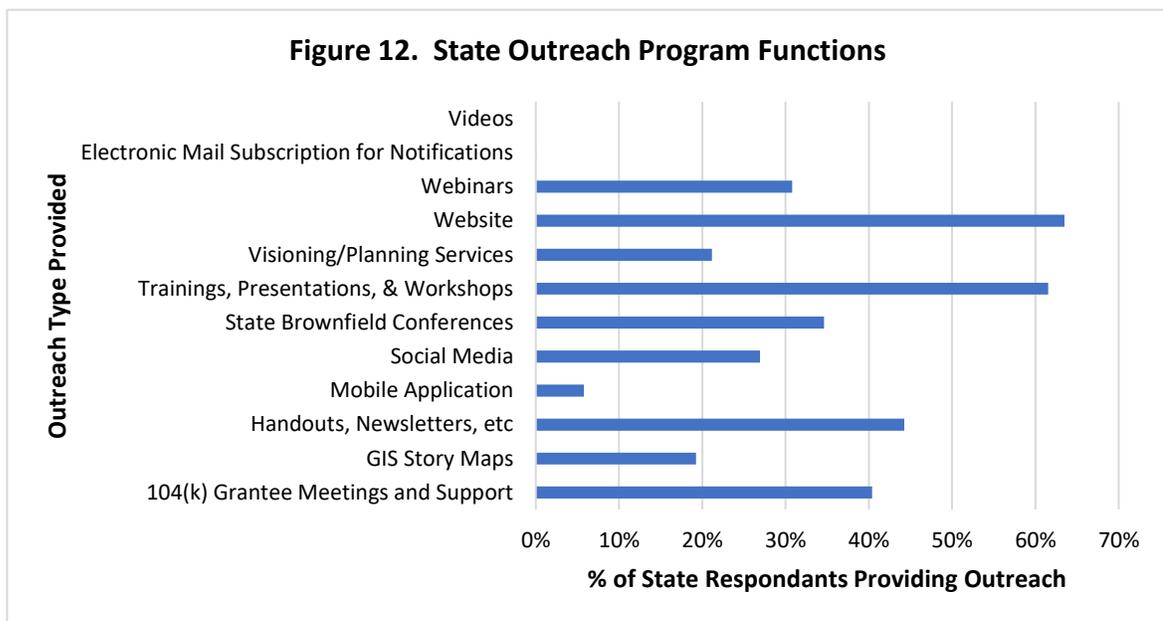
1. For the technical side of the program the main categories included: comfort letters, IC establishment, IC long term monitoring, maintaining an inventory of sites using GIS, holding pre-VCP meetings, site audits and inspections, and site cleanup plan reviews. Figure 11 shows that the majority of State programs provide all of these program functions. In nearly all cases EPA funding is used in conjunction with state funding to support these functions.



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2. For the outreach side of the program the main categories included: support for 104K grantees, GIS story maps, handouts, mobile apps, social media, State conferences, trainings, visioning/planning, websites, webinars, list serves, and videos. Figure 12 shows the percentage of States offering these program functions, and that the most common by far were providing a website, trainings, and workshops. Less common outreach functions included creating a mobile application and creation of brownfield videos.

It was found that State outreach related activities are funded with EPA 128(a) grant dollars one hundred percent (100%) of the time. Approximately forty-four percent (44%) of States supplement 128(a) funds with State dollars to support these activities as well.



PROGRAM FUNCTION TAKEAWAYS:

- EPA funding, and in particular 128(a) funding, is heavily relied upon for both the technical and outreach aspects of State brownfield programs.
- The technical functions offered by State brownfield programs, such as review of cleanup plans, establishment and monitoring of ICs, etc. does not vary much between State programs.
- The outreach functions provided by each State is more variable as States are discovering new ways to communicate. This provides States with a great learning opportunity.
- Fifty-four percent (54%) of States have pre-VCP meetings to help improve submittals and ultimately improve the outcomes of their VCP program. The use of 128(a) funds to assist in supporting this activity should be considered by more States.
- Results from question 2 regarding institutional controls found that fifty-four percent (54%) of States are using GIS to track Brownfield sites, however only nineteen percent (19%) indicated that they are using GIS story maps. There is tremendous untapped potential for story map generation, and it is an area of Brownfield redevelopment marketing that could greatly improve.

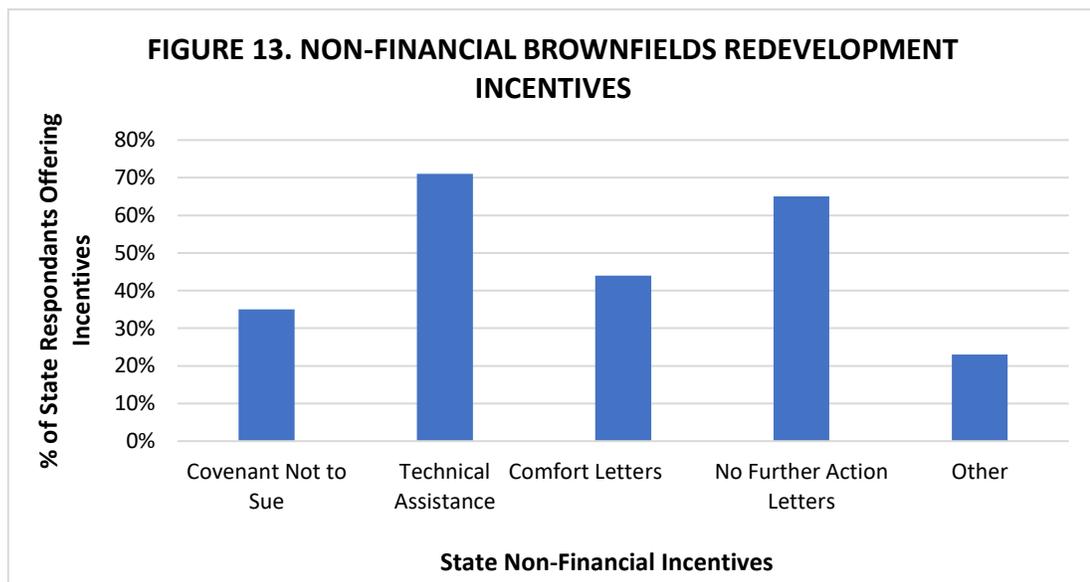
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- The use of mobile applications is only being used by 6% of States and only one State is doing videos to promote the brownfield program. These are areas for potential growth in the future.

X. NON-FINANCIAL INCENTIVES

In addition to financial assistance, States often provide non-financial incentives, benefits, and services, including technical assistance, liability protections, comfort letters, covenant not to sue, and no further action determinations. The research tool asked agencies to identify the non-financial incentives they offered. The results are summarized below and in Figure 13.

1. Seventy-four percent (74%) of States indicated that they offer both technical assistance and a no further action or similar completion document. Thirty-six percent (36%) of States offer a covenant not to sue.
2. Approximately half of all respondents offer some sort of comfort letter which can take the form of a perspective purchaser agreement, compliance letter, status letter, or liability protections.



NON-FINANCIAL INCENTIVES TAKEAWAYS:

- Technical Assistance and No Further Action Letters are two key non-financial assistance mechanisms that are being currently offered by the majority of States.
- Comfort letters such as perspective purchaser agreements, status letters, and liability protections are only being offered by about half of the States and could be an easy way Brownfields programs could increase their non-financial assistance to Brownfields redevelopment in their States.

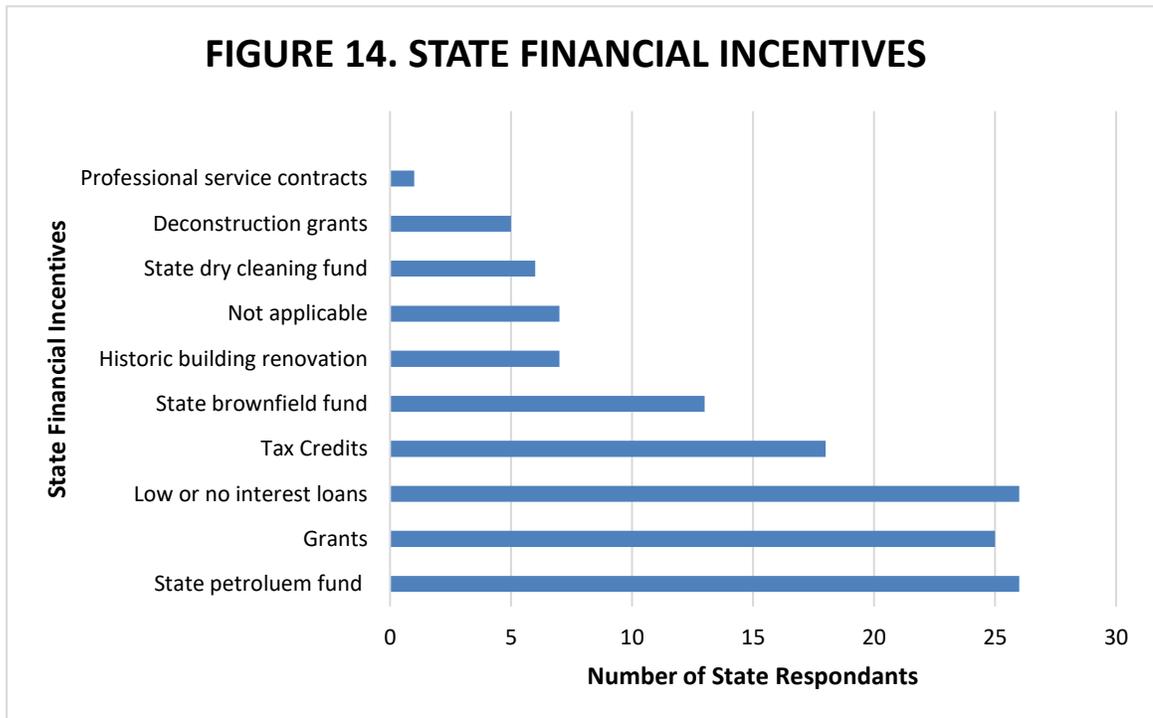
XI. FINANCIAL INCENTIVES

The additional costs associated with addressing the environmental and blighted conditions of brownfield properties is often why they remain vacant and underutilized. For developers to overcome these additional costs, financial incentives have become an essential element of brownfield redevelopment.

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State programs were asked to identify what financial incentives are provided by their agencies and whether any development outcomes are evaluated, prioritized, or encouraged for a project to receive funding. The results are summarized below:

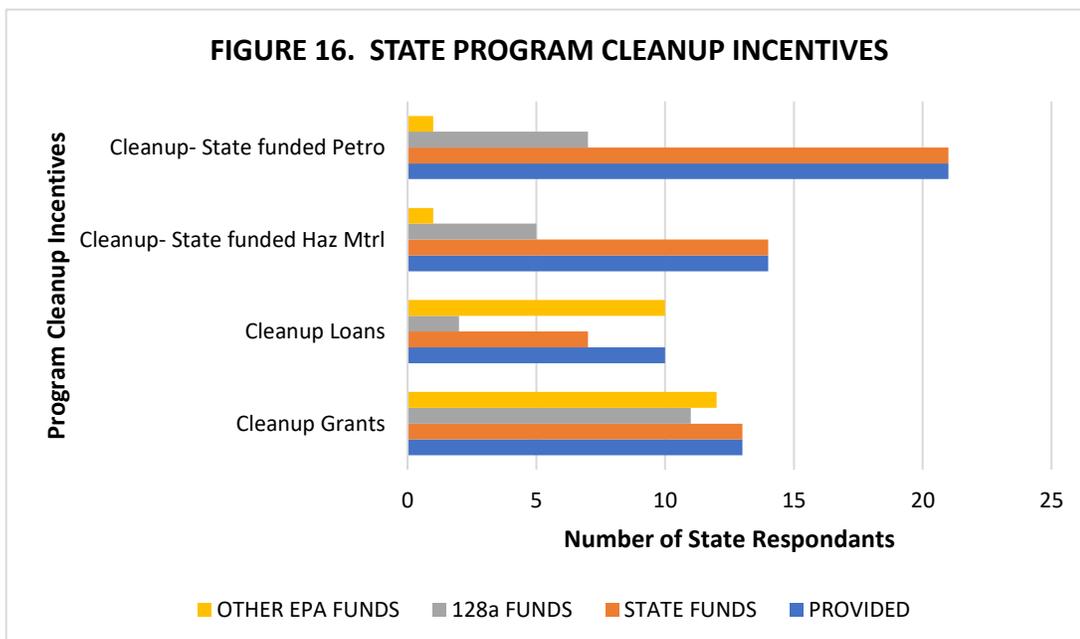
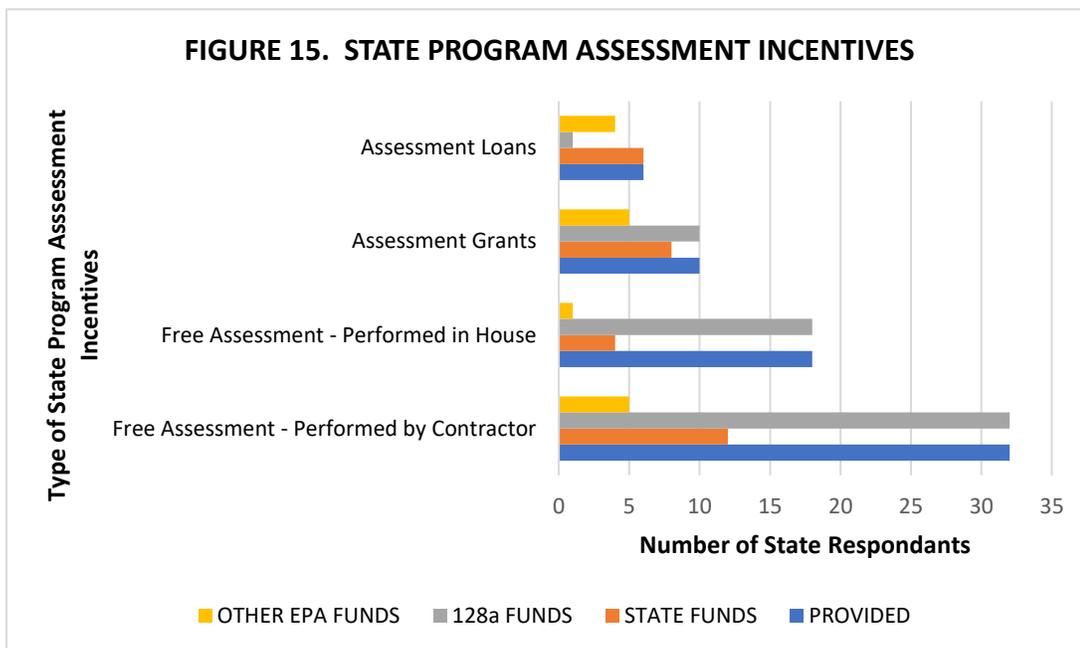
1. Most States offer a fund specific to petroleum contamination/USTS, with roughly forty-eight percent (48%) providing grants. A much smaller percentage of State programs have more specific financial incentives that include dry cleaning funds, tax credits, historic building renovation, and deconstruction grants. Figure 14 summarizes the various State incentives.



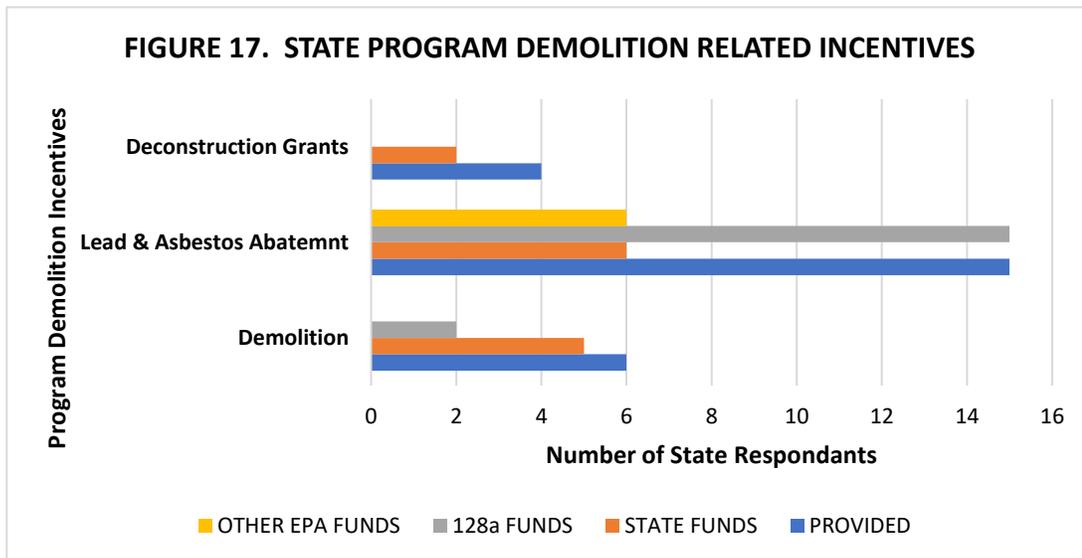
2. Forty-eight percent (48%) also responded that they provided low or no interest loans. The responses to this question show that there was some confusion regarding whether responses should have included state programs that use EPA 104k Revolving funds, or if it was strictly for state funded loan programs. A brief analysis of US EPA data shows that roughly 60% of States have 104k revolving loans. Additional follow up would be required to accurately separate state funded loan programs from 104k funded programs.
3. Surprisingly, most State programs do not consider specific development measured outcomes when determining which project shall receive funding. Of those who do, job creation, private investment, and increase in property values are most often used. These outcomes are typically determined by estimates provided up front. Only one state (NJ) claimed to use actual numbers for job creation.
4. State programs were asked to identify the incentives provided by their agencies for specific activities. Figures 15 and 16 show that nearly all States offer incentives for assessment and cleanup. Close to half of the programs provide some form of demolition related incentives, and less than twenty percent (20%) of the programs provide tax incentives.

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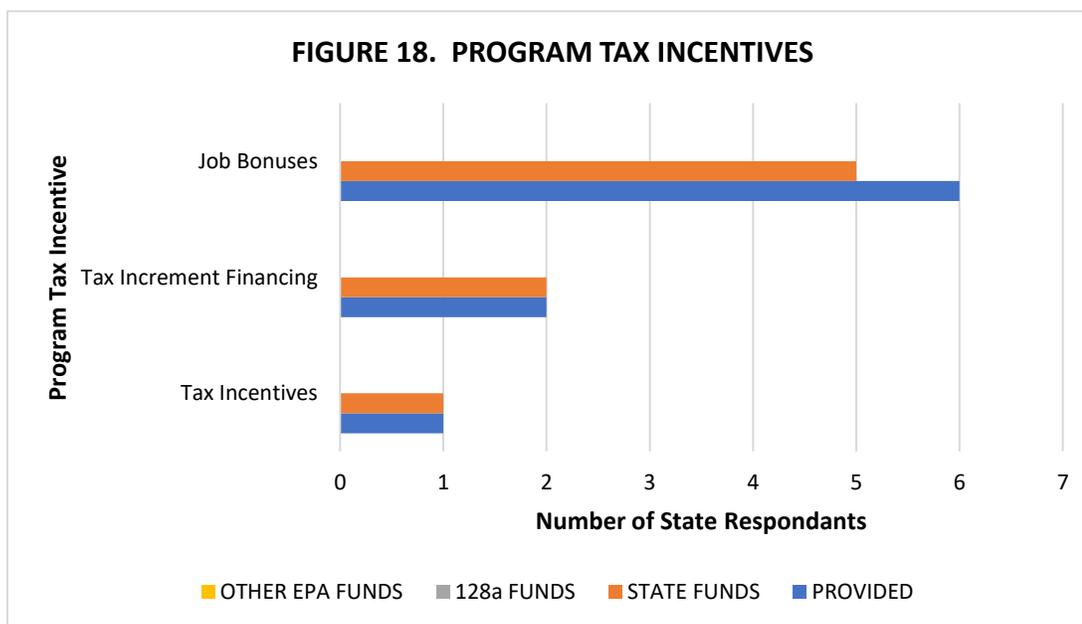
5. Results show that when assessment activities are offered, they are most often funded via EPA's 128(a) funds. On the other hand, when cleanup activities are offered, they are most often funded via a State Program.
6. Figures 15 through 17 provide a summary of the financial incentives for the most common brownfield activities: site assessments, clean up, and demolition related activities. The figures show if a State provides a given incentive for these activities and if so, how it is funded.



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7. Figure 18 summarizes tax incentives provided by the States. Once again, the figure shows if a State provides this type of incentive and if so, how it is funded. It can be seen that very few States provide this type of incentive.



FINANCIAL INCENTIVE TAKEAWAYS:

- Most States offer some form of financial brownfield redevelopment incentives, the most common being petroleum/UST specific.
- Most States do not require specific brownfield redevelopment outcomes such as investment, job creation, etc.

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- Nearly all States offer incentives for assessment and cleanup.
- 128(a) funding is heavily utilized by State programs to incentivize brownfield related work. This is most prevalent within the assessment and cleanup incentives but is also heavily used for lead & asbestos abatement.
- The 128(a) grant is used by all States to fund assessment activities, which are the crucial first step toward redeveloping brownfield properties.
- Funding provided by the States were most often either special revenue/tax assessment or other State funding.

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**APPENDIX A
RESEARCH TOOL QUESTIONS**

1. **Voluntarily Cleanup Program (VCP)**
 - *Do you have a VCP? If not, what do you have?*
 - *Any fees collected?*
 - *Do you provide an NFA?*
 - *Does anything make an applicant ineligible?*
 - *Any restrictions on sites completing VCP? Considered lessening restrictions?*
 - *Have a Financial cap? Considered raising cap?*
 - *Long term O&M estimates for FAM?*

2. **Institutional Controls (ICs)**
 - *Method for monitoring ICs*
 - *Funding for IC Monitoring*
 - *Number of registered ICs*
 - *Frequency of IC inspection*

3. **Comfort Letters**
 - *Do you write them?*
 - *What are they used for?*
 - *Procedure for compiling?*
 - *Do you require VCP enrollment?*

4. **Beneficial use of contaminated fill**
 - *Do you allow on-site reuse?*
 - *Do you allow off-site reuse?*

5. **Land Use Tracking**
 - *Does your State track land use after redevelopment of brownfields sites?*

6. **Cleanup Criteria**
 - *What does your State use to screen chemicals of concern (COCs) at brownfield sites?*
 - *EPA Standards*
 - *State Standards*
 - *Both*

7. **Brownfield Staffing**
 - *What number of dedicated brownfields staff are currently in your state brownfield program (FTEs)?*
 - *What type of funding does your State use to fund program staff?*

8. **Program Functions**
 - *Does your State perform the following technical functions/activities?*
 - *Comfort Letters*
 - *IC Establishment*
 - *IC Long-Term Monitoring*

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- *Maintaining an inventory of sites using GIS*
- *Pre-VCP meetings and technical review with potential applicants*
- *Site Audits and Inspections*
- *Site Cleanup Plan Reviews*
- *Does your State perform the following outreach related functions/activities?*
 - *104(k) Grantee Meetings and Support*
 - *GIS Story Maps*
 - *Handouts, Newsletters, etc.*
 - *Mobile Application*
 - *Social Media*
 - *State/Territorial Brownfield Conferences*
 - *Trainings, Presentations, & Workshops*
 - *Visioning/Planning Services*
 - *Website*
 - *Webinars*
 - *Electronic Mail Subscription (listserv) for Notifications*
 - *Videos*
- *How are these functions/activities funded?*
 - *Provided by State program*
 - *State Funding Supported*
 - *128(a) Grant*
 - *104(k) Grants*
 - *104(k) Revolving Loan*
 - *Other funding sources?*

9. Non-Financial Incentives

- *Which of the following does your state offer?*
 - *Covenant Not to Sue*
 - *Comfort Letters*
 - *No Further Action (or similar) document*
 - *Technical Assistance*

10. Financial Incentives

- *Which of the following funding programs does your state offer?*
 - *Brownfield Grants*
 - *Low or no interest loans*
 - *State fund specifically applicable to brownfields*
 - *State fund specifically applicable to dry cleaning redevelopment*
 - *State fund specific to petroleum contamination/USTs*
 - *Deconstruction Grants*
 - *Historic building renovation fund*
 - *Tax credits*
- *Do redevelopment incentives require, encourage, or prioritize any of the following outcomes?*
 - *Affordable housing*
 - *Green infrastructure*
 - *Greenspace*
 - *Historic preservation*

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- *Increased payroll/employment taxes*
- *Increased property taxes*
- *Job creation/growth*
- *Private investment*
- *How are Outcomes measured?*
- *Does your program utilize any of the following incentive tools?*
 - *Assessment - Free [128(a) or state managed]: Performed by contractor*
 - *Assessment - Free [128(a) or state managed]: Performed in-house*
 - *Assessment - Grants (grantee managed)*
 - *Assessment - Loans (borrower managed)*
 - *Cleanup - Grants*
 - *Cleanup - Loans*
 - *Cleanup - State funded Hazardous Material*
 - *Cleanup - State funded Petroleum*
 - *Deconstruction - Grants*
 - *Demolition*
 - *Lead and Asbestos Abatement*
 - *Job Bonuses*
 - *Tax incentives or Credits*
 - *Tax Increment Financing*
- *How are these tools funded?*
 - *Provided by State program*
 - *State Funding Supported*
 - *Program Fees*
 - *Bonds*
 - *Special Revenue/Tax*
 - *Other State Funding*
 - *128(a) Grant*
 - *104(k) Grants*
 - *104(k) Revolving Loan*
 - *Other funding sources?*

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**APPENDIX B
INFOGRAPHIC**

[Click here for the Brownfields Focus Group Research Tool Infographic](#)