

Attachment—Additional Questions for the Record

**Subcommittee on Environment and Climate Change
Hearing on
“Back from the Brink: Restoring Brownfield Sites to Economic Engines”
February 15, 2022**

Mr. Jason Seyler, Brownfields Coordinator, Montana Department of Environmental Quality, On
behalf of the Association of State and Territorial Solid Waste Management Officials
(ASTSWMO)

The Honorable Debbie Dingell (D-MI)

1. Cleaning up contaminated brownfield sites is only half the battle. Finding a productive use for these sites after they are cleaned up is the other half. These sites could be ideal locations for clean energy development, including solar farms. This would not only restore the former brownfield property to beneficial environmental and economic use, but it would also leave greenfield property available for farming and other best uses.
 - a. Would you agree that solar farms would be a good use for brownfield properties?

RESPONSE: Yes, solar farms would be an excellent reuse of brownfield properties. As most Brownfields sites are smaller than 10 acres, these properties would be especially situated for small “solar garden” community owned solar projects. These sites may also be suitable for siting other energy infrastructure, such as battery storage, combined solar and battery micro-grid systems, and/or electric vehicle charging stations.

- b. What policies would be necessary to encourage this practice, particularly if there are additional costs involved compared to locating on a greenfield property?

RESPONSE: From talks with solar developers, the biggest incentive to increase solar development within brownfield projects is to make the brownfields site more financially beneficial than developing on a greenfield. One method to incentivize the restoration of brownfield properties would be to provide solar farms (both large and small) with a higher federal solar Investment Tax Credit (ITC) rate than is available for greenfield solar projects.

The Honorable Cathy McMorris Rodgers (R-WA)

1. EPA's brownfields program has two major pots of grant funding: section 104(k) grants for assessment and cleanup and section 128 grants for state brownfields programs.
 - a. Please speak to the benefits of the brownfields grant funding derived from the section 128 grants.

RESPONSE:

The following are the largest benefits of the section 128(a) grants to States and Tribes (States). The most critical is that it provides States with staff to assist communities in navigating brownfield sites from identification to redevelopment. State Brownfields coordinators are instrumental in establishing the relationships necessary for successful brownfields redevelopment, between community leaders, economic development organizations, non-profits, and developers. As noted by the Hon. Michael Largent (Whitman County Commissioner), 128(a) State assistance is essential for small, rural, and underserved communities that do not have the staff nor the capacity to take on new programs and manage brownfields assessments and cleanups. In addition, the 128(a) programs are uniquely situated to provide a limited number of "micro-cleanup" grants to small, rural, and underserved communities whose projects would not be competitive on the national level. Without the 128(a) funds, the awareness of brownfields resources at the local level would be minimal, and the U.S. EPA would have a tremendously difficult time in evenly distributing Brownfields funds across the country.

- b. Please speak to the parts of the section 104(k) grants that states find the most useful.

RESPONSE:

The most useful aspect of 104(k) grants is that it allows for communities, non-profits, and economic development organizations to build local capacity and increase the understanding of how brownfields can assist with redevelopment of blighted and underutilized properties. However, the 104(k) revolving loan fund cleanup (RLF) grants provide unique and critical cleanup funding assistance. EPA Targeted Brownfields Assessments (TBAs) cannot provide cleanup assistance; in addition, the funding for States to provide micro-cleanup grants to small, rural, and underserved communities through their 128(a) grants has historically been insufficient to address local demand. This has meant that the majority of brownfields redevelopment has had to rely almost exclusively on 104(k) RLF grants for essential cleanup grants and loans, as national cleanup grants have become increasingly competitive.