

under this Factor. The relationship between the proposed eligible activities, community needs and purposes of the program funding must be clearly described, as set forth below, in order to receive points for this Factor. In rating this Factor, HUD will consider the following:

(1) Consistency/Appropriateness of Proposed Activities with Identified Needs (Up to 8 points). The applicant should address the extent to which the proposed plan for use of BEDI grant/Section 108-guaranteed loan funds will address the needs described in Rating Factor 2 above, regarding the distress and extent of the problem in the target area or area to be benefited and the long-term benefit for current residents of the target area. The applicant should provide a clear and quantified explanation of this relationship. As part of the response to this Factor, an applicant should also fully describe:

(a) How the project will achieve one of the National Objectives under the Community Development Block Grant program (see 24 CFR 570.208) and the eligible activities that will be carried out under 24 CFR 570.703, including citations to the specific regulatory subsections supporting eligibility of activities and compliance with National Objectives; and

(b) How the project will address the following policy priorities:

(i) For all BEDI projects, the extent to which the proposed project will improve the quality of life in the nation's communities, by bringing private capital to distressed communities; and

(ii) For BEDI projects that include the construction or rehabilitation of housing:

(A) The extent to which the project will increase affordable housing and homeownership opportunities for low- and moderate income persons, the disabled, the elderly, minorities and families where English may be the second language, whether through the provision of housing or employment which will enable residents to access affordable housing and have a choice of such housing in environmentally healthy and revitalized neighborhoods; and

(B) The extent to which the project will encourage accessible design features for persons with disabilities.

(2) Feasibility and Demonstrable Benefits (Up to 15 points). In responding to this subfactor (2), the applicant should demonstrate the extent to which the redevelopment plan for the brownfields site is logical, feasible and likely to achieve its stated purpose. Applicants are reminded that HUD's

intention is to fund brownfields economic development projects and activities that will quickly produce measurable economic benefits and advance the purposes of the BEDI program. The applicant's response should demonstrate the extent to which the project is "ready to go," meaning that the project is likely to be completed within three to five years from the date of the BEDI award and will produce near-term, measurable economic benefits. Points for this subfactor will be awarded in two parts, for the following:

(a) Implementation Steps (Up to 8 points). The applicant's response should discuss the extent to which the redevelopment plan demonstrates a clear understanding of each of the steps required to implement the brownfields economic development project, including the actions that all parties responsible for implementing the project must complete. The applicant's response to this subfactor should address:

(i) Environmental Investigation. This subfactor (i) will consider the extent to which the redevelopment plan takes into account environmental issues typical of many brownfields remediation efforts. Proposed projects on sites where the nature and degree of environmental contamination is not well-quantified, where no environmental investigation has commenced, or that are the subject of on-going litigation or environmental enforcement actions will receive fewer points under this subfactor (i). Similarly, fewer points will be awarded to proposed projects at sites with exceptionally expensive contamination problems that may be beyond the scope of the BEDI and Section 108 programs' financial resources or other resources firmly committed to the project as described in the application, and sites subject to pending and current litigation that may not be available for remediation and development or redevelopment in a time-frame that will produce near-term and measurable economic benefits through the use of BEDI and Section 108 funds.

(ii) Site Control. This subfactor (ii) will consider the extent to which control of the proposed project site has been secured or is being sought.

(iii) Regulatory and Other Approvals. This subfactor (iii) will consider the extent to which any required zoning classifications, environmental regulatory approvals, waivers, general and special use permits, assessment district designations, public easements or rights-of-way have been secured or are being sought.

(iv) User Agreements. This subfactor (iv) will consider the extent to which any development agreements, leases, memoranda of understanding or other agreements integral to the success of the project have been secured or are being sought.

(b) Timing and Delivery of Project Benefits (Up to 7 points). The applicant's response should set forth the strategy and schedule for the delivery of the project's measurable economic benefits.

(i) Project Benefits. The response to this subfactor (i) should include a full description of the problem (e.g., the extent of environmental contamination, the need for jobs, the shortage of affordable housing, etc.) and the measurable economic benefits that will accrue from the project (e.g. the number of permanent jobs, the amount of commercial or industrial space to be created, the number of housing units to be provided, etc.). The response to this subfactor (i) must also include the time frame in which the measurable economic benefits are to be delivered. For multi-phase projects, the response to this Factor must clearly delineate the different phases of the project and indicate whether or not they are to be funded by BEDI/Section 108 funds. Brownfields economic development projects that provide near-term, measurable economic benefits directly through the creation or retention of jobs will receive a greater number of points under this subfactor (i). BEDI projects that utilize innovative construction techniques, technologies or other strategies in order to achieve increased energy efficiency will also receive a greater number of points under this subfactor (i).

(ii) Project Schedule. The applicant should provide a specific time schedule (with both beginning and end dates) for carrying out the project and identify interim measurable benchmarks (acquisition, site improvements, construction, etc.) to be accomplished. The applicant should also include a proposed schedule for drawing down all funds necessary to complete the project, including BEDI and Section 108 funds.

A timeline form is provided in Appendix A to this program section of the NOFA for the purpose of illustrating the project schedule, but HUD will consider the timeline form only as an illustration of the narrative response to this subfactor (ii).

(3) Section 108 Application (Up to 2 points). BEDI applications accompanied by a full and complete Section 108 application will receive up to two (2) points for this subfactor (3). BEDI applications accompanied by a copy of