

Commonwealth of Pennsylvania



DEPARTMENT OF
CONSERVATION AND NATURAL RESOURCES

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

December 5, 2022

Honorable Michael S. Regan, Administrator
U.S. Environmental Protection Agency
EPA Docket Center
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Docket No. EPA-HQ-OA-2022-0859

Re: Comments on EPA's Request for Information: Greenhouse Gas (GHG) Reduction Fund
(October 21, 2022) – Docket No. EPA-HQ-OA-2022-0859

Dear Administrator Regan:

The Pennsylvania Department of Environmental Protection (DEP) and Department of Conservation and Natural Resources (DCNR) submit the following joint comments to the U.S. Environmental Protection Agency (EPA) in response to the *Request for Information: Greenhouse Gas Reduction Fund* published by the EPA on October 21, 2022.

Section 1: Low-Income and Disadvantaged Communities

- 1. What should EPA consider when defining “low income” and “disadvantaged” communities for purposes of this program? What elements from existing definitions, criteria, screening tools, etc., - in federal programs or otherwise - should EPA consider when prioritizing low-income and disadvantaged communities for greenhouse gas and other air pollution reducing projects?*

Pennsylvania DEP and DCNR encourage the EPA to measure and consider the cumulative impacts that have resulted from environmental racism, environmental injustice, and impacts of climate change born disproportionately by low-income communities, indigenous populations, and people of color. EPA should incorporate health equity and social determinants into the decision-making process. The social determinants of health are the conditions in which people are born, grow, work, live, and age, and the wider set of forces and systems shaping the conditions of daily life. These forces and systems include economic policies and systems, development agendas, social norms, social policies and political systems.

As such, EPA should allow for flexibility and state-level definitions of these terms. States often use screening tools to justify how “low-income” and “disadvantaged” communities are defined. Tools such as EPA’s EJSCREEN and Climate and Economic Justice Screening Tool (CEJST) are helpful and establish a floor for defining these terms. Additionally, EPA should consider definitions established by states and that differ from EPA’s definitions for these terms. For example, Pennsylvania uses an EJ Areas Viewer (dep.pa.gov/EJViewer) tool to implement Pennsylvania’s Environmental Justice Policy and is set to be updated regularly as new data becomes available. If EPA allowed for the use of this tool, it would help strengthen its use by federal, state, and community partners.

2. *What kinds of technical and/or financial assistance should the Greenhouse Gas Reduction Fund grants facilitate to ensure that low-income and disadvantaged communities can participate in and benefit from the program?*

EPA should evaluate and identify policies and practices that may have led to past and current funding inequities and commit to evaluating internal systems with the goal of continuously advancing equity in all aspects of the funding and grantmaking processes whenever possible. EPA should consider how funding programs can strengthen community capacity to promote equity. EPA should collaborate with state agencies to conduct an outreach strategy specifically designed to reach under-resourced communities and receive direct feedback from community members about their specific needs.

Whether EPA conducts this outreach or includes outreach effort considerations in grant applications, focusing on community voices is paramount. DEP frequently hears from well-respected small and grass-roots organizations about the obstacles they encounter when attempting to access grants funds. Specifically, communities identify lack of technical assistance as a common barrier to accessing resources. Technical assistance programs, as opposed to webinars, would significantly increase disadvantaged communities’ abilities to write grant applications and fulfill program requirements.

EPA should consider technical and/or financial assistance in convening, education, and training projects that foster public engagement. EPA could fund peer-to-peer partnerships that can leverage expertise, resources, and trust from existing and thriving community partners to build capacity among entities within the community. Financial assistance would allow municipal entities, or nonprofits working within under-resourced and/or underserved communities, to hire a professional consultant or dedicated staff person to focus specifically on leveraging public and private funding opportunities and address the environmental justice needs of the community.

3. *What kinds of technical and/or financial assistance should the Greenhouse Gas Reduction Fund grants facilitate to support and/or prioritize businesses owned or led by members of low-income or disadvantaged communities?*

EPA should consider being as flexible as possible to allow for small businesses that have not previously worked on federal grants to participate, particularly if they are located in low-income or disadvantaged communities. The complexities around federal contracting serve as an important safeguard to prevent fraud but can also be overly cumbersome in a way that may limit participation

from businesses that are located in, serve members of, or employ people from low-income or disadvantaged communities. DEP encourages EPA to consider ways to streamline participation and provide training for small businesses on federal processes. Also, EPA should work with states and localities to accept and allow Minority Business Enterprise or other state designations where possible to assist in expanding participation (e.g., [PA DGS](#), [City of Pittsburgh](#), [City of Philadelphia](#)). Working with states to help circulate information will also greatly supplement efforts to increase awareness of program opportunities. In advance of the grant application opening, EPA should reach out extensively with community members to encourage them to promote the grant program and increase awareness to businesses in their community.

Section 2: Program Design

1. *What should EPA consider in the design of the program to ensure Greenhouse Gas Reduction Fund grants facilitate high private-sector leverage (i.e., each dollar of federal funding mobilizes additional private funding)?*

A key element in attracting the expertise and private capital necessary for robust and effective financing products is the availability of funds that can be considered consumable by using those funds to directly pay administrative costs of contracted firms and to reduce risk to private sector leveraging capital. Identifying a design element that allows for a reasonable amount of funds to be used as a loan loss reserve or other fund loss insurance strategies would help to bring private capital to the table. EPA should consider offering additional assistance like interest rate buy-downs to make the program more desirable, encourage participation, and increase through-put or deal-flow.

While most of the Greenhouse Gas Reduction funds should be investment capital that is recycled for long term benefits, a limited portion should be made available as consumable capital to help leverage high private-sector involvement. Pennsylvania's Energy Development Authority (PEDA) has been exploring opportunities to work with financial firms to develop and implement clean energy financing products to support the deployment of clean energy projects using these design elements. PEDA has begun to identify and retain the expertise needed to both successfully launch and support the design and promotion of any new financing products that will be developed and deployed by the Greenhouse Gas Reduction Fund.

2. *What should EPA consider in the design of the program to ensure Greenhouse Gas Reduction Fund grants facilitate additionality (i.e., federal funding invests in projects that would have otherwise lacked access to financing)?*

Climate change is a global problem and greenhouse gas emissions have global—not local, regional or national—impacts. A global crisis requires sharp focus on getting the most reductions possible to alleviate the impacts of the crisis. With that said, EPA should give priority to local projects that aim to increase community resilience through distributed energy systems and serve critical infrastructure in vulnerable communities. This could include agriculture production sites, grocery stores, public safety facilities and community centers.

EPA should also consider the incorporation of sustainability practices that avoid unnecessary forest conversions, keep mature forests intact, support wildlife habitat and corridors, ensure the integrity of our water resources, and defend against degradation of our environment.

Furthermore, DEP suggests that the EPA guidelines should be written to clearly include state entities such as State Energy Offices and other in-state established programs, which, to date, have established a track record for deploying grants, loans, and technical assistance. EPA should also include support programs and confirm that programs deployed within a state, or which benefit the state, provide additionality or supplementation, not supplant existing programs. To facilitate this process, DEP requests that State Energy Offices and state government agencies, such as the Pennsylvania Department of Environmental Protection and the Pennsylvania Energy Development Authority, be eligible sub-recipients under Sec. 134 (a)(2) GENERAL ASSISTANCE, and (3) LOW-INCOME AND DISADVANTAGED COMMUNITIES.

For example, DEP would plan to apply for funds under 134 (a) (1) ZERO-EMISSION TECHNOLOGIES to further capitalize on and provide additionality to any new green bank financing products that it has already established or is in the process of establishing. Additionally, DEP and the Pennsylvania Energy Development Authority could consider additional funding as a sub-recipient under a national green bank utilizing the funds from (a)(2) and (a)(3). While state entities are not specifically named as eligible under 134 (a)(2) and (a)(3), DEP believes they should be eligible sub-recipients to provide additional opportunities to support existing and new opportunities.

3. *What should EPA consider in the design of the program to ensure that revenue from financial assistance provided using Greenhouse Gas Reduction Fund grants is recycled to ensure continued operability?*

Often, communities and facilities managers lack the upfront capital to be able to identify energy priorities and properly design and engineer solutions with high likelihoods for success. DEP believes that grants to sub-recipients for technical assistance and community engagement will result in a pipeline of worthy clean energy projects that will result in saved energy and emissions saved, as well as revenue generation. Such projects generate revenue pay back and often pay back early. Success engenders more success and the desire to develop and design future projects. Revenue recycling depends on projects that pay back and an increased appetite to acquire funding and deploy additional projects.

DEP suggests that EPA guidelines allow for funds to be used as technical assistance grants for project planning and design, so that projects can more efficiently obtain financing approvals, result in success, and provide an easy pathway for continued success. Combining limited technical assistance grants with favorable financing products will ensure financing products utilizing Greenhouse Gas Reduction Fund grants will be successful, repeatable, and more responsive to community needs. As such, DEP encourages EPA to allow this flexibility within program guidelines.

4. *What should EPA consider in the design of the program to enable Greenhouse Gas Reduction Fund grants to facilitate broad private market capital formation for greenhouse gas and air pollution reducing projects? How could Greenhouse Gas Reduction Fund grants help prove the “bankability” of financial structures that could then be replicated by private sector financial institutions?*

See the response to number 3 above.

5. *Are there best practices in program design that EPA should consider to reduce burdens on applicants, grantees, and/or subrecipients (including borrowers)?*

Pennsylvania recently developed Funding Equity Principles that are designed to support a more equitable distribution of Commonwealth funding, increase access and reduce barriers, better serve marginalized communities, and reach a more diverse pool of applicants. A few recommendations include:

- Simplify the funding application process. Ensure guidelines and instructions are clear and concise and intentionally use plain language. Avoid the use of acronyms and bureaucratic jargon. Highlight the most important grant information and goals content first and place legal and other boilerplate terms and conditions language at the end.
- Ensure the application is accessible to all, including people with disabilities, by incorporating accessibility criteria throughout the project. Agencies should refer to Commonwealth resources such as Digital Accessibility Knowledge Repository and Language Access Knowledge Repository.
- After a funding opportunity closes and grants are awarded, the agency should evaluate the entire process as it relates to equity and identify “lessons learned” to continue to improve the process moving forward.
- Evaluate funding and grant applications, as permitted under the Commonwealth's Grant Management Directive, based on merit and need.
- Evaluate narratives on the substance and merit of the proposal. Avoid penalizing applicants solely based on writing style, grammar, and spelling.
- The agency should strive to establish a funding review team that is demographically reflective of the communities and key parties it serves.
- Require program managers and application reviewers to complete training through Office of Administration related to equitable funding distribution.
- Use data-driven, evidence-based, and science-based approaches appropriately and effectively to support the decision-making process and to better increase transparency, accountability, and trust.
- When feasible, lower or eliminate funding match requirements to minimize barriers to participation as some applicants may not be able to afford matching resources.
- Publicize direct contact information for the staff who are responsible for providing prospective applicants with overall guidance and technical assistance for each funding program.
- Consider how the reporting process can be simplified and streamlined for both grantees and agencies.

- Consider how the reimbursement process can be simplified and ensure prompt payment whenever possible.
- If the application requires submitting significant amounts of information and data, consider establishing a preliminary round where only the most pertinent information is required and evaluated to determine if the application goes further.
- Create a Frequently asked Questions (FAQ) resource for each funding program(s) and/or establish a mechanism that allows applicants to easily ask questions. All FAQ documents should be posted publicly so all interested applicants can access the questions and answers.

EPA is also encouraged to, where feasible, streamline and standardize a compliance certification process within its Greenhouse Gas Reduction Fund program guidelines to reduce the administrative burden while ensuring compliance and minimizing variability in requirements from state to state and program to program. Providing tools or designated assistance that recipients and sub-recipients can use to either certify or self-certify compliance with federal and/or state requirements, such as prevailing wage and Buy American, with appropriate record keeping is key to reducing the burden of mistakes and costly non-compliance issues. Periodic third-party assistance, practice auditing, and access to responsible professionals that can be paid with administrative funds from the Greenhouse Gas Reduction Fund would both further ensure compliance and reduce anxiety and burden.

6. *What, if any, common federal grant program design features should EPA consider or avoid in order to maximize the ability of eligible recipients and/or indirect recipients to leverage and recycle Greenhouse Gas Reduction Fund grants?*

EPA should develop an outreach strategy that considers how underserved and minoritized communities receive information. This might include disseminating information in community flyers, neighborhood newsletters, and church bulletins beyond some of the more traditional forms of communication. To do this, agencies should identify partner organizations to work with within these communities to develop a strategy that can help build a more diverse applicant pool. Establish technical assistance programs, peer-to-peer networks, and training opportunities that offer equitable resources to grant applicants and support capacity building.

Establish better inter-agency collaboration that supports investments in underserved communities without communities bearing the full burden of bureaucratic and administrative barriers.

7. *What should EPA consider in the design of the program, in addition to prevailing wage requirements in section 314 of the Clean Air Act, to encourage grantees and subrecipients to fund projects that create high quality jobs and adhere to best practices for labor standards, consistent with guidance such as Executive Order 14063 on the Use of Project Labor Agreements and the Department of Labor's Good Jobs Principles?*

EPA should ensure that projects have on-the-job training and technical instruction components that empower workers to build competency in new trades and acquire marketable skills. Consideration should be given to how these programs can employ the unemployed and underemployed in targeted communities. Consider incorporating learn-as-you-earn training

components that establish viable pathways to long-term careers in various sectors of the workforce.

8. *What should EPA consider when developing program guidance and policies, such as the appropriate collection of data, to ensure that greenhouse gas and air pollution reduction projects funded by grantees and subrecipients comply with the requirements of Title VI of the Civil Rights Act, which prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance?*

EPA should follow existing procedures that have been used for decades by other federal agencies for grants when evaluating Title VI. Greenhouse gases are a global pollutant, not a local one. Urban areas contain a disproportionate number of environmental justice areas and disadvantaged residents and bear a greater brunt of climate change harms than most areas through the creation of heat islands and localized flooding.

EPA should also incentivize and encourage anti-displacement strategies. EPA should require the consideration of unintended consequences of each project and actively engage residents and interested parties representing minoritized and low-income populations early in the planning process to systematically ensure agency programs carefully consider and are responsive to community needs.

9. *What should EPA consider when developing program policies and guidance to ensure that greenhouse gas and air pollution reduction projects funded by grantees and subrecipients comply with the requirements of the Build America, Buy America Act that requires domestic procurement of iron, steel, manufactured products, and construction material?*

NO RESPONSE

10. *What federal, state and/or local programs, including other programs included in the Inflation Reduction Act and the Infrastructure Investment and Jobs Act or “Bipartisan Infrastructure Law,” could EPA consider when designing the Greenhouse Gas Reduction Fund? How could such programs complement the funding available through the Greenhouse Gas Reduction Fund?*

EPA should consider replicating and expanding its REACH program (Regional Equity and Capacity Hubs) that offers targeted technical assistance to underserved communities (i.e., communities with Environmental Justice (EJ) concerns) where multiple hubs (e.g., grantees, contractors) provide support on a wide range of environmental equity, capacity, funding and training concerns.

11. *Is guidance specific to Tribal and/or territorial governments necessary to implement the program? If so, what specific issues should such guidance address?*

NO RESPONSE

Section 3: Eligible Projects

1. *What types of projects should EPA prioritize under sections 134(a)(1)-(3), consistent with the statutory definition of “qualified projects” and “zero emissions technology” as well as the statute’s direct and indirect investment provisions? Please describe how prioritizing such projects would:*
 - a. *maximize greenhouse gas emission and air pollution reductions;*
 - b. *deliver benefits to low-income and disadvantaged communities;*
 - c. *enable investment in projects that would otherwise lack access to capital or financing;*
 - d. *recycle repayments and other revenue received from financial assistance provided using the grant funds to ensure continued operability; and*
 - e. *facilitate increased private sector investment.*

Investments in commercial and residential buildings: EPA should prioritize programs and projects that maximize energy efficiency and conservation and rehabilitate and renovate buildings, especially multi-unit residential buildings and underutilized or abandoned commercial properties. While there is great interest in utilizing Greenhouse Gas Reduction Fund grants for distributed generation projects, especially rooftop solar, emphasizing efficiency first will ensure that the energy from generation projects will have maximum impact and improve cost effectiveness.

Investment in Infrastructure (non-Building): EPA should prioritize projects that reduce or eliminate traditional fossil fuel technologies and utilize clean energy generation technologies, especially those that can be paired with electrical energy storage. For example, include community-based electric vehicle (EV) charging stations and charging strategies for EV owners in multi-unit residential buildings that is supported by energy storage or bidirectional charging to reduce peak loads and resulting greenhouse gas emissions. EPA should consider developing strategies beyond traditional models for those who park on the street or at curbside charging solutions.

Consider significant projects that convert commercial fleets to zero emission vehicles, prioritizing medium- and heavy-duty regional haul trucks that operate in environmental justice communities. Projects utilizing electrical energy storage are prime examples of how clean energy generation should also be prioritized. These projects have the potential not only to provide substantial air pollution reductions but also to enable more efficient use of renewable energy and to improve reliability, especially when utilized in microgrids and/or for backup power at critical facilities. Using energy storage to reduce or eliminate high-emitting fossil-fueled peaker power plants offers great potential to reduce impacts on overburdened, low-income communities and could be an excellent priority use of Greenhouse Gas Reduction Fund grants.

2. *Please describe what forms of financial assistance (e.g. subgrants, loans, or other forms of financial assistance) are necessary to fill financing gaps, enable investment, and accelerate deployment of such projects.*

DEP recommends that EPA's guidelines for the Greenhouse Gas Reduction Fund be open to a broad range of financial assistance products, from subgrants for technical assistance to loans with favorable rates and financing terms. Allowing for flexibility will enable states to fill in gaps in existing programs, while potentially taking into consideration unique state law requirements. This flexibility will also allow states to coordinate existing state funds and other federal funds, from programs funded through the Infrastructure Investment and Jobs Act to leverage and maximize project opportunities and greenhouse gas reductions.

3. Beyond financial assistance for project financing what other supports – such as technical assistance -- are necessary to accelerate deployment of such projects?

DEP and DCNR view stakeholder engagement combined with technical assistance as key to developing projects with high likelihoods for success. While there are certainly projects currently in various stages of development, it will be critical to engage low-income and disadvantaged communities to build the trust and offer technical assistance that will result in strategic use of the funds rather than a fragmented, project-by-project approach. EPA should allow funds to be utilized to hire firms as sub-recipients to perform the stakeholder engagement and technical assistance and should also allow the award of sub-grants to communities to hire their own firms to perform these functions.

Technical assistance could be key in bringing under-resourced communities and partners to the table and ensuring their projects achieve successful outcomes. Lowering, or not requiring the match when feasible, should be considered. We have learned that match requirements can be a huge burden for some communities. Incorporate capacity-building into the framework of the program and allow for allocations that strengthen support systems. Grantees require experienced and skilled staff (and/or volunteers) to accomplish key goals, including the know-how to request and receive the right funding and technical assistance from external sources.

Zero-interest bridge loans could be beneficial for implementing clean-energy projects where it may take several months for the project to come on-line and thus generate revenue and/or savings.

Section 4: Eligible Recipients

1. Who could be eligible entities and/or indirect recipients under the Greenhouse Gas Reduction Fund consistent with statutory requirements specified in section 134 of the Clean Air Act? Please provide a description of these types of entities and references regarding the total capital deployed by such entities into greenhouse gas and air pollution reducing projects.

Echoing a previous response in Section 2, DEP suggests that EPA guidelines should be written to clearly include state entities, such as DEP and PEDDA, to be eligible sub-recipients under Section 134 (a)(2) GENERAL ASSISTANCE, and (3) LOW-INCOME AND DISADVANTAGED COMMUNITIES. DEP initially plans to apply for funds under 134 (a)(1) ZERO-EMISSION TECHNOLOGIES to further capitalize on its new green bank financing products. DEP would then consider additional funding as a sub-recipient under a national green bank utilizing the

funds from (a)(2) and (a)(3). While state entities are not specifically named as eligible under 134 (a)(2) and (a)(3), DEP believes they should be considered eligible sub-recipients.

2. *What types of entities (as eligible recipients and/or indirect recipients) could enable Greenhouse Gas Reduction Fund grants to support investment and deployment of greenhouse gas and air pollution reducing projects in low-income and disadvantaged communities?*

It is critical to work with low-income and disadvantaged communities as much as possible to identify needs in and create projects. Whether EPA directly conducts that outreach or puts it in the grant application for applicants to consider, demonstration of centering on the voices of these communities is key.

Additionally, community land trusts as well as conservation organizations can serve as key partners in acquiring real estate to support community solar and/or green infrastructure projects.

3. *What types of entities (as eligible recipients and/or indirect recipients) could be created to enable Greenhouse Gas Reduction Fund grants to support investment in and deployment of greenhouse gas and air pollution reducing projects in communities where capacity to finance and deploy such projects does not currently exist?*

Whether EPA directly conducts outreach or includes community outreach in the grant application, demonstration of centering on the voices of these communities is key. Indirect recipients from low-income and disadvantaged communities should help set the agenda for which projects are proposed to meet community needs.

4. *How could EPA ensure the responsible implementation of the Greenhouse Gas Reduction Fund grants by new entities without a track record?*

Providing hands on technical assistance and training for new entities, particularly those from low-income and disadvantaged communities, can assist in ensuring they meet compliance. EPA should consider being as flexible as possible to allow for small businesses that have not previously worked on federal grants to take part, especially if they are in low-income or disadvantaged communities.

Complexities surrounding federal contracting serve as important safeguards to prevent fraud, but they can also be overly cumbersome and limit participation from businesses that are in, serve members of, or employ people from low-income or disadvantaged communities. EPA should consider ways to streamline participation and provide training for businesses on federal processes while also working with states and localities to accept and allow Minority Business Enterprise or other state designations to assist in expanding participation (e.g., [PA DGS](#), [City of Pittsburgh](#), [City of Philadelphia](#)). Working with states to help spread the work will further boost general awareness about this opportunity. Performing extensive outreach to community members will enable them to assist with getting the word out to businesses in their community.

EPA should strive to engage new organizations and businesses, particularly small and minority-owned entities through this new program. Encourage these entities to share recommendations from existing partners. Ensure the reporting and auditing process is transparent and streamlined, eliminating any unnecessary barriers. Create simple checklists to ensure applicants know what is needed to successfully complete the application process. Integrate status or progress updates within the online funding application system that allow grant applicants to easily track progress as they are completing the application. If possible, have dedicated staff who can check in with new applicants on a monthly or quarterly basis at least in the first year of the funding allocation.

5. *What kinds of technical and/or financial assistance could Greenhouse Gas Reduction Fund grants facilitate to maximize investment in and deployment of greenhouse gas and air pollution reducing projects by existing and/or new eligible recipients and/or indirect recipients?*

Indirect recipients from low-income and disadvantaged communities should help to set the agenda for which projects are being done to meet community needs. Providing hands on technical assistance and training for new entities, particularly those from low-income and disadvantaged communities, will be needed to improve access to folks from these communities.

DCNR recommends providing technical assistance to expand and enhance urban forests and tree canopies as well as natural open space. EPA could contract with DCNR or other partners to provide guidance and support in site preparation, urban tree plantings, tree care, and lawn and asphalt conversions to natural areas.

Establish technical assistance programs, peer-to-peer networks, and training opportunities that offer equitable resources to grant applicants and support capacity building.

EPA should consider how inequitable broadband coverage could impact the ability of some communities, particularly those in rural regions and low-income communities, to access grant information or online webinars.

Develop an outreach strategy that considers how underserved and minoritized communities receive information. This might include disseminating information in community flyers, neighborhood newsletters, and church bulletins beyond some of the more traditional forms of communication. To do this, agencies should identify partner organizations to work with within these communities to develop a strategy that can help build a more diverse applicant pool.

Also encourage equity and diversity within the procurement processes that are a component of these grant programs. According to a Harvard University [report](#), “exclusionary barriers have historically prevented organizations led by people of color from receiving their fair share of government contracting dollars while simultaneously making it easier for white-owned businesses to win contracts. These barriers include explicit discrimination, non-discriminatory barriers such as large project sizes and excessive bonding requirements, and pervasive barriers such as limited access to capital and social networks.”

Consider how procurement at the federal level can be simplified to open more doors to small and minority-owned businesses.

Section 5: Oversight and Reporting

- 1. What types of governance structures, reporting requirements and audit requirements (consistent with applicable federal regulations) should EPA consider requiring of direct and indirect recipients of Greenhouse Gas Reduction Fund grants to ensure the responsible implementation and oversight of grantee/subrecipient operations and financial assistance activities?*

We want accountability without an overcomplicated administrative process. The Commonwealth's funding equity recommendations include:

- Consider how the reporting process can be simplified and streamlined for both grantees and agencies.
 - Consider how the reimbursement process can be simplified and ensure prompt payment whenever possible. Allow for partial payouts throughout the lifetime of the grant based on milestones.
 - If the application requires submitting significant amounts of information and data, consider establishing a preliminary round where only the most pertinent information is required and evaluated to determine if the application goes further.
 - Establish realistic thresholds regarding project completion for reimbursement requests.
- 2. Are there any compliance requirements in addition to those provided for in Federal statutes or regulations (e.g., requirements related to administering federal grant funds) that EPA should consider when designing the program?*

NO RESPONSE

- 3. What metrics and indicators should EPA use to track relevant program outcomes including, but not limited to, (a) reductions in greenhouse gas emissions or air pollution, (b) allocation of benefits to low-income and disadvantaged communities, (c) private sector leverage and project additionality, (d) number of greenhouse gas and air pollution reduction projects funded and (f) distribution of projects at the national, regional, state and local levels?*

In addition to the emissions metrics and the allocation of benefits to low-income and disadvantaged communities, EPA should consider metrics that include number of trees planted, acres of lawn or asphalt converted to meadow or natural space. EPA should consider the total emission reduction potential and cost-effectiveness of the reductions (i.e., how many tons of GHG reduction per \$1 granted).

- 4. What should EPA consider in the design of the program to ensure community accountability for projects funded directly or indirectly by the Greenhouse Gas Reduction Fund? What, if any, existing governance structures, assessment criteria (e.g.,*

the Community Development Financial Institutions Fund's Target Market Accountability criteria), rules, etc., should EPA consider?

Accountability should include meeting greenhouse gas reduction goals but also education and outreach efforts that result in an engaged and educated community around the specific project and the EPA's efforts to mitigate climate change and its impacts.

Section 6: General Comments

1. Do you have any other comments on the implementation of the Greenhouse Gas Reduction Fund?

We strongly encourage EPA to dedicate administrative funding for staff at the state level to administer these funds. Additionally, EPA should allow funding not only in the implementation and development of green infrastructure projects, but to support longer-term maintenance of these sites and improved accessibility when outdoor recreation is incorporated into the design. It is also critical that these funds support educational and outreach components that allow under-resourced communities to conduct a comprehensive public participation process in the design and implementation phases of these projects.

Because many states have their own GHG reduction goals and priorities, we encourage EPA to include states, specifically State Energy Offices, in the decision-making process of awarding projects to an entity within a state. If we are able to be part of the decision-making process at a minimum, states should be made directly aware of projects funded through the Greenhouse Gas Reduction Fund in order to coordinate projects and priorities.

DEP and DCNR appreciate the opportunity to provide comments on EPA's Request for Information. Thank you for your consideration in this matter. If you have questions or comments, please contact Jessica Shirley, Infrastructure Implementation Coordinator, by e-mail at jessshirley@pa.gov, or by telephone at 717.425.6613, or David Althoff, Director of the Energy Programs Office, by e-mail at dalthoff@pa.gov, or by telephone at 717.783.0542.

Sincerely,



Cindy Dunn
Secretary
Pennsylvania Department of Conservation and Natural Resources



Ramez Ziadeh, P.E.
Acting Secretary
Pennsylvania Department of Environmental Protection