LGAC Charge
Inflation Reduction Act

Overview
Through President Biden's Inflation Reduction Act (IRA), the U.S. Environmental Protection Agency (EPA) has received an historic amount of funding to leverage our expertise and existing programs, as well as to set up and execute new programs. These programs, which include funding for air quality and climate projects addressing clean energy, transportation, methane emissions, and climate super-pollutants, implemented by EPA's Office of Air and Radiation will advance the President's bold agenda to combat the climate crisis, protect public health and advance environmental justice.

EPA is seeking input on a subset of new and existing programs to deliver substantial emissions reductions to tackle climate change, improve public health, and reduce pollution in overburdened communities.

Please note that the EPA has opened several dockets to receive public input on its IRA programming. Based on statutory deadlines, EPA is seeking input regarding the Greenhouse Gas Reduction Fund through December 5 (see details here), as well as its additional nonregulatory programs under EPA through January 18 (see details here).

Part One – Green Gas Reduction Fund
The Greenhouse Gas Reduction Fund, allocates $27 billion dollars to EPA to award grants until September 30, 2024, and includes:

- $7 billion for competitive grants to States, municipalities, Tribal Governments, and eligible recipients, to enable low-income and disadvantaged communities to deploy or benefit from zero-emission technologies, including distributed technologies on residential rooftops, and to carry out other greenhouse gas emission reduction activities

Charge Questions
Please provide recommendations on these questions prior to December 20, 2022.

1. In your experience as elected and appointed officials of local, state, tribal, and territorial governments, how can a public-private partnership effectively benefit a community? What challenges should EPA be aware of as it develops programs?

2. How can EPA develop and implement its program to help state, municipal, and tribal greenhouse gas programs achieve maximum GHG reductions for citizens, government operations, and entities operating within their jurisdictions?

3. What kinds of technical and/or financial assistance should EPA provide to ensure that low-income and disadvantaged communities are able to access IRA funding, particularly the Greenhouse Gas Reduction Fund and Climate Pollution Reduction Grants?

Part Two – Climate Pollution Reduction Grants
EPA received $5 billion to assist states, air pollution control agencies, tribes and local governments to

develop and implement strong, climate pollution reduction strategies. These eligible entities can apply for planning grants and then apply for grants to implement those plans. This is a new program that will be informed by comments received via this request for public comment in addition to other stakeholder engagement activities that the Agency will be conducting consistent with its Grant Competition policy.

Please provide recommendations on these questions prior to January 16, 2022.

1. What are the most promising greenhouse gas (GHG) planning and reduction opportunities that could be catalyzed by the Climate Pollution Reduction grants, taking into consideration:
    a. Total potential for GHG reductions and other co-benefits;
    b. Gaps in existing resources, programs, or policies;
    c. Availability of other government funding streams?

2. How should the EPA integrate the needs of underserved communities into the design of this program, taking into consideration:
    a. What equity and justice concerns, opportunities, or priorities are most relevant for this program and how can EPA best help address them?
    b. How can EPA best address the statutory requirement to consider the "degree to which greenhouse gas air pollution is projected to be reduced in total and with respect to low-income and disadvantaged communities"?

3. This program consists of $250 million in state planning grants, $4.607 billion in state climate implementation grants, and $142.5 million for state climate administrative funding. How should EPA implement and coordinate planning and implementation funding to make the greatest impact with the funds as a whole?

4. EPA plans to provide technical assistance to grant recipients.
    a. What technical assistance would be most helpful to eligible entities as they develop climate plans under the Climate Pollution Reduction Program?
    b. What technical assistance would be most helpful as applicants prepare for the implementation phase of the program?

5. How can EPA facilitate coordination and leveraging of other available funding and planning efforts to maximize effectiveness of the program (e.g., timing of implementation grant solicitations, time needed to complete a plan, guidance on program interactions, etc.)?

6. What internal capacity challenges do you face regarding the development and implementation of GHG reduction plans? How can EPA help address those challenges?

7. What metrics should this program use for measuring success and ensuring accountability?

8. How can EPA structure this program to facilitate cooperation and coordination within and across tribal, local, regional, and state agencies to implement climate policies?

9. What should EPA consider in the design of the program to encourage grantees to support 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?

10. How could EPA design this program to align with any legal, regulatory, or voluntary obligations state, local and tribal governments – or regional planning bodies -- may have to quantify and reduce emissions including potential requirements from proposed rulemakings?

11. EPA wants to ensure applicants have adequate time and funding to develop their climate action plans before the deadline to apply for implementation funds. In your experience, how much time and funding is required to complete a state, municipal, or tribal climate action plan?

Part Three - Clean Heavy-Duty Vehicles

EPA received $4 billion for two new programs to reduce emissions from the transportation sector. The first program is the Clean Heavy-Duty Vehicle program that will invest $1 billion to help cover the costs of replacing dirty heavy-duty vehicles with clean alternatives, deploy supporting infrastructure, and/or train and develop the necessary workforce. At least $400 million must go to nonattainment areas. The application is open to states, municipalities, Indian tribes, nonprofit school transportation associations, and eligible contractors.

Charge Questions:

Please provide recommendations on these questions prior to January 16, 2022.

1. How do you see this program working in conjunction with the existing Diesel Emissions Reduction Act (DERA), the Bipartisan Infrastructure Law (BIL) Clean School Bus program, and programs at other agencies given the overlap in vehicles that could be funded?

2. For which significant Class 6/7 vehicle sectors should EPA prioritize funding?

3. How can EPA ensure the benefits of this program reach low-income and disadvantaged communities?

4. What should EPA consider in the design of the program to encourage grantees to support 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?

5. What metrics should this program use for measuring success and ensuring accountability?