# A. Funding Type and Allocations

Q1: What is a non-competitive formula grant program?

A1: Under a formula grant program, EPA provides a pre-established amount of funding to a group of eligible entities rather than conducting a competitive application process. Certain eligible entities are identified by EPA to receive funding if they agree to meet the terms and conditions of the grant agreement and submit an approvable workplan and budget. In this program, planning grants will be in the form of cooperative agreements, and planning grant recipients will be required to develop climate action plans designed to reduce greenhouse gas emissions and with particular attention to measures that will have benefits for low income and disadvantaged communities.

Q2: Why is EPA awarding the planning grants through a non-competitive formula grant approach?

A2: EPA is awarding planning grants non-competitively to accelerate the awards process and reduce the application burden for applicants.

Q3: What is a cooperative agreement?

A3: A cooperative agreement is similar to a grant but allows for substantial programmatic involvement between EPA and the funding recipient. See <u>EPA's Funding Instruments and Authorities</u> for additional details. The term "grant" used throughout the <u>program guidance</u> means "cooperative agreements" as defined by 2 CFR 200.1.

Q4: What level of funding are states eligible to receive?

A4: All states are eligible for up to \$3 million in funding for a four-year planning period. EPA decided on this funding level based on feedback received in response to the November 2022 Request for Information about the cost of past plan development. States are eligible "for up to" \$3 million because a state may submit a budget that does not demonstrate a need for the full funding amount of \$3 million, in which case the state would receive only what its demonstrated need is.

Q5: What municipalities are receiving funding? How much?

A5: An initial list of the 67 most populous metropolitan areas eligible to receive planning grants is provided in the <u>program guidance</u>. Each of these 67 municipalities is eligible to receive up to \$1 million. Additional areas may become eligible for funding if a state declines funding and/or if one of the 67 areas on the list declines funding. Please refer to Tables 15.2 and 15.3 in the <u>program guidance</u> for the full list of Metropolitan Statistical Areas (MSAs) ranked by total population nationally and by state.

Q6: What geographic scope should a metropolitan area plan cover? Do metropolitan area plans need to follow the boundary lines of an MSA? Can they include additional neighboring jurisdictions? Do they need to include all jurisdictions within the MSA?

A6: Metropolitan area plans are expected to cover the geographic scope of the individual sub-state jurisdictions (e.g., cities, counties, air pollution control agency districts) that comprise the <u>metropolitan statistical area (MSA)</u> as delineated by United States Office of Management and Budget based on U.S. Census Bureau data. Inclusion of neighboring jurisdictions, outside the boundary lines of the MSA, is allowed and encouraged. Metropolitan area plans should include GHG reduction measures that apply to the metro area broadly and that can be implemented by the municipalities comprising the metro area. Such plans will enable municipalities to be well-positioned to apply for competitive implementation grants.

Q7: Which tribes will receive funding, and what amount will they receive?

A7: EPA has set aside \$25 million for climate planning grants for federally-recognized tribes. While single tribes may receive up to \$500,000 each, and groups of 2 or more tribes, or tribal consortia, are eligible to receive up to \$1 million, the <u>program guidance</u> addressing CPRG funding for tribes does not specify which tribes will receive funding or the specific amount any particular tribe will receive. Each EPA regional office will work with their respective tribes to determine specific funding amounts based on interest and other factors such as tribal population, emission sources, and technical capacity.

Q8: Can a state, territory, tribe, or metropolitan area apply for less than the full allocation amount?

A8: Yes, you can apply for less than the full allocation amount if your workplan and budget demonstrate you can complete all the required elements outlined in the program guidance within the amount of funding that you are requesting.

Q9: If I decline funds or ask for less than my full allocation amount, can I access those funds at a later time?

A9: All planning grant funds will be distributed based on workplans and budgets submitted by the application deadlines in the <u>program guidance</u>. Any remaining funds will be made available to additional eligible tribes, air pollution control agencies, or municipalities and will **not** be available at a later date.

Q10: Can a state or metropolitan area apply for more than the full allocation amount?

A10: No, you cannot apply for more than the full allocation amount.

## New questions posted 4-21-2023

Q11. How was the funding reallocated for the states that did not opt in? What happens if a state withdraws their NOIP and already has MSAs on the list of 67 presumptive MSA recipients?

A11. Four states (Florida, Iowa, Kentucky, and South Dakota) did not submit an NOIP by March 31<sup>st</sup> and therefore declined their \$3 million in planning grant funding. According to the process outlined in the Planning Grant Guidance, the following additional MSAs became eligible for the \$1M in funding reserved for MSAs:

METRO AREA	MAIN STATE	EPA REGION	MSA RANK IN STATE (BY POP)	METRO AREA RANK
New Haven-Milford, CT Metro Area	СТ	1	3	68
Allentown-Bethlehem-Easton, PA-NJ Metro Area	PA	3	3	69
Oxnard-Thousand Oaks-Ventura, CA Metro Area	CA	9	9	70
North Port-Sarasota-Bradenton, FL Metro Area	FL	4	5	71
Columbia, SC Metro Area	SC	4	2	72
Des Moines-West Des Moines, IA Metro Area	IA	7	1	82
Lexington-Fayette, KY Metro Area	KY	4	2	109
Davenport-Moline-Rock Island, IA-IL Metro Area	IA	7	2	143
Sioux Falls, SD Metro Area	SD	8	1	178
Cedar Rapids, IA Metro Area	IA	7	3	179
Bowling Green, KY Metro Area	KY	4	3	244
Rapid City, SD Metro Area	SD	8	2	302

Under the CPRG planning grant program, if a state withdraws their NOIP, those funds would be made available to the 3 most populous metropolitan areas in that state on the MSA list found in Appendix 15.2 of the program guidance for states, municipalities, and air pollution control agencies, that have submitted a Notice of Intent to Participate (NOIP) before the April 28, 2023 deadline. If the state already had 1-3 MSA's receiving \$1 million under the national list (the local funding for the 67 most populous metropolitan areas), then those MSAs would take on the state's funding (assuming they had submitted an NOIP by the April 28 deadline) and their originally awarded \$1 million would go back to the national funding pool, allowing more MSAs on the national list that have submitted NOIP's to become eligible for funding. Up to three large metro areas in that state would continue to be eligible to receive up to \$1 million each (as long as they identify a lead organization and opt in by the April 28 deadline) but would be funded from the state allocation (\$3 million) rather than the national MSA funding pool. Funds from the national MSA funding pool will be awarded to the next MSA on the national list.

Q12. Can two or more MSA grantees work together to develop one plan (or two coordinated plans) covering the overall region? Can the planning grants be combined and managed by a single lead organization? (There would be efficiencies to administering combined grants versus keeping separate records for audit etc.)

A12. Yes, there are circumstances under which multiple MSAs may pool their funding under the CPRG planning grants to develop deliverables that cover all jurisdictions within the MSAs. For example, the MSAs would need to be geographically proximate such that a combined plan would allow for better coordinated climate planning and identification and implementation of GHG emission reduction measures than would otherwise have been the case if the MSAs pursued separate planning efforts. Furthermore, MSAs seeking to pool funding to develop a single PCAP, CCAP, and Status Report for their combined areas would need to agree on a single lead organization to be responsible for managing the combined grant and all applicable requirements.

Decisions about combining MSA grants will be made on a case-by-case basis. Please contact your EPA regional office to discuss if a combined approach could be appropriate for your MSA.

# **B.** Eligibility and Notification

Q1: How are territories defined under this program?

A1: Under the CPRG program, territories are defined as American Samoa, Guam, the Commonwealth of the Northern Mariana Islands, and the U.S. Virgin Islands.

Q2: How are you defining municipality?

A2: Section 302 of the Clean Air Act defines "municipality" as a city, town, borough, county, parish, district, or other public body created by or pursuant to State law. Consistent with new Section 137(d)(1) of the Clean Air Act, a group of municipalities, such as a council of governments, may also be considered an eligible entity under this program in some cases, e.g., if the council of governments is a legal entity capable of receiving a Federal grant.

Q3: What is a metropolitan statistical area (MSA)?

A3: An MSA is a metropolitan area with a core area containing a substantial population nucleus, together with adjacent communities having a high degree of economic and social integration with that core. MSAs contain at least one urbanized area of 50,000 or more in population, and one or more counties. The United States Office of Management and Budget (OMB) delineates metropolitan and micropolitan statistical areas according to published standards that are applied to Census Bureau data.

Note also that the Office of Management and Budget (OMB) also delineates New England city and town areas (NECTAs) as a city/town-based set of areas in 6 states that is conceptually similar to county-based MSAs. Metropolitan NECTAs contain at least one urbanized area of 50,000 or more population, similar to MSAs, but are based on city and town "building blocks" instead of counties.

Q4: How will a lead organization be identified for a metropolitan area? What happens if more than one jurisdiction wants to serve as the lead organization for an area? What if not all jurisdictions in an MSA want to participate?

A4: EPA recommends that the leaders of municipalities and local governments (such as leaders of cities, counties, and local air pollution control agencies) within and around a listed MSA coordinate with each other to identify an eligible lead organization to administer the planning grant. The lead organization may sub-award funds to other jurisdictions, academic institutions, or non-profit organizations to assist in the development of a regional plan in accordance with EPA grants policy. As noted above, Metropolitan area plans are expected to cover the geographic scope of the individual sub-state jurisdictions (e.g., cities, counties, air pollution control agency districts) that comprise the metropolitan statistical area (MSA)

In the event of a dispute among jurisdictions to administer funds for a metropolitan area (i.e., if more than one entity submits a NOIP to serve as the lead agency for the same area), EPA will first notify each entity and ask them to come to agreement. If they cannot timely resolve the issue, EPA will expect the mayor of the most populous city in the MSA as determined by the 2020 U.S. Census to determine the lead organization to administer the award to develop climate plan deliverables for the area. The lead organization should collaborate with other jurisdictions in their MSA to the extent possible; however not all jurisdictions are required to participate in order for EPA to award a cooperative grant for a metropolitan area.

Q5: Why does the CPRG planning grant program include funding at the metropolitan area level rather than just for individual municipalities?

A5: In the U.S., many cities have been leaders in developing plans, adopting policies, and taking actions to improve the ability of their residents to adapt to the effects of climate change and to implement strategies to reduce GHG emissions. The CPRG program includes planning grant funding at the metropolitan area level to encourage groups of cities, counties, and other local leaders to collaborate on a regional level. Regional climate planning provides a range of possible benefits and opportunities. For example, MSA-based planning can help build and expand a network of regional leaders, provide peer collaboration and sharing of best practices, integrate and improve regional transportation and mobility networks, expand regional clean energy workforce training, negotiate more favorable regional electricity rates, collectively address decarbonization strategies for areas of dense industrial activity, align building and energy codes, and track implementation progress across cities using common metrics.

Q6: Can a nonprofit organization or university be considered an eligible entity and receive a planning grant? Can a state or municipality designate a non-profit partner to receive funds on their behalf?

A6: Generally no, but we encourage such organizations to seek opportunities to collaborate with or support eligible entities in developing or updating their climate plans. Note that an eligible entity that receives a planning grant can provide sub-awards to such organizations.

Q7: How will I know if my state or MSA has accepted funds?

A7: EPA will maintain a list of eligible entities who have submitted a NOIP to accept planning funds as the designated lead organization for the state or MSA, and EPA will make relevant contact information for these organizations available in order to facilitate coordination and collaboration. Please note that this will be a preliminary list as entities will still need to submit an approvable grant application to receive an award. We plan to maintain these lists on the CPRG website at: https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants.

Q8: How can a smaller municipality that isn't part of an MSA benefit from this program?

A8: CPRG can improve the lives of millions of Americans by helping to combat climate change and improving air quality in neighborhoods where people live, work, play, and go to school. All communities will benefit from these changes.

In addition, municipalities who do not receive direct funding from the planning grants can benefit from working with their state government (or a nearby MSA if applicable):

- EPA is requiring each state government who receives funding to collaborate with air pollution control districts and large and small municipalities statewide and to conduct meaningful engagement with low income and disadvantaged communities throughout its jurisdiction.
- As part of that process, states must work with those groups to identify and include priority GHG
  reduction measures in their plan that can be implemented at the municipal level. Municipalities
  will be eligible to apply for CPRG implementation funding for those identified measures (even if
  they did not receive a direct planning grant).
- Further, this collaborative process will help municipalities identify other funding opportunities that they can leverage to fund priority actions.

Finally, EPA will be providing tools and technical assistance to support CPRG planning and implementation grant recipients. Many of those resources, as well as new models and lessons learned from the grant program, will be made available to all interested municipalities to support their climate planning and implementation efforts.

### New questions posted 3-27-2023

Q9: Are Councils of Governments, Metropolitan Planning Organizations, Regional Planning Organizations, Regional Planning Associations, Regional Planning Commissions, etc., eligible entities under this grant?

A9: Consistent with new section 137(d)(1) of the Clean Air Act, a group of municipalities, such as a council of governments or other regional council, is an eligible entity for a metropolitan area CPRG planning grant if it meets the following requirements:

- It is accountable to local units of government;
- It is a legal entity capable of receiving a Federal grant;
- It has widespread support of member jurisdictions to receive the grant; and,
- It has the programmatic capability to complete a comprehensive climate action plan addressing all relevant sectors of GHG emissions.

Q10: Do the tribes that apply have to be federally recognized?

A10: Yes, only federally recognized tribes are eligible recipients of a CPRG planning grant. As defined by Clean Air Act section 302: "The term 'Indian tribe' means any Indian tribe, band, nation, or other organized group or community, including any Alaska Native village, which is Federally recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians." Non-federally recognized tribes may work with states, metropolitan areas, or federally recognized tribes or tribal consortia, but may not be a direct recipient.

Q11: We are a Clean Air Agency in a MSA with a population smaller than that of the 67 most populous MSAs. Can we apply separately from our State for a CPRG planning grant?

A11: Organizations representing MSAs beyond the presumptive list of 67 funding recipients for a planning grant may submit a Notice of Intent to Participate (NOIP) by the April 28, 2023, deadline to be considered in the event that planning grant funding becomes available to additional metropolitan areas. In the event such funding does not become available, however, EPA notes that under their planning grants, states must work with municipalities and air pollution control agencies to identify and include priority GHG reduction measures in the state plan that can be implemented at the municipal or air agency level. Municipalities and air agencies will be eligible to apply for CPRG implementation funding for those identified measures (even if they did not receive a direct planning grant).

Q12: How does the EPA decide who is sufficient to participate as a lead? For example, Seattle is part of the Seattle/Tacoma/Bellevue metro area. Do we need all three mayors involved?

A12: EPA is not designating or recommending a lead organization for a metropolitan area. EPA recommends that the leaders of municipalities and local governments (such as leaders of cities, counties, and local air pollution control agencies) within and around a listed metropolitan statistical area (MSA) coordinate with each other to identify an eligible lead organization to administer the planning grant. The lead organization may sub-award funds to other jurisdictions, academic institutions, or non-profit organizations to assist in the development of a regional plan in accordance with EPA grants policy. Metropolitan area plans are expected to cover the geographic scope of the individual sub-state jurisdictions (e.g., cities, counties, air pollution control agency districts) that comprise the MSA.

In the event of a dispute among jurisdictions to administer funds for a metropolitan area (i.e., if more than one entity submits a NOIP to serve as the lead agency for the same area), EPA will first notify each entity and ask them to come to agreement. If they cannot timely resolve the issue, EPA will expect the mayor of the most populous city in the MSA as determined by the 2020 U.S. Census to determine the lead organization to administer the award to develop climate plan deliverables for the area. The lead organization should collaborate with other jurisdictions in their MSA to the extent possible; however not all jurisdictions are required to participate in order for EPA to award a planning grant for a metropolitan area.

Q13: Why isn't the metropolitan Washington, DC, area on the list of eligible metropolitan areas? Is the District of Columbia required to work with jurisdictions in its MSA, since the MSA is ineligible for funding?

A13: The District of Columbia is eligible to receive funding under the state formula allocation. States are required to collaborate with municipalities and air pollution control agencies within their state. Because the District of Columbia has no internal sub-state jurisdictions, they are encouraged to coordinate with municipalities in the portions of Virginia, Maryland, and West Virginia that are part of the MSA. We encourage leaders of those jurisdictions to reach out to the lead organization for the District of Columbia to discuss this possibility. In addition, those municipalities would be eligible to implement activities identified in their respective states' PCAP provided their states opt in to receive funding.

#### Question updated 6-22-2023

Q14. An earlier FAQ says non-profit organizations are not eligible. Does this mean tribal consortia are not eligible entities? Are Alaska Native Corporations eligible entities?

A14. In general, non-profit organizations are not eligible entities for the CPRG program. However, new section 137(d)(1) of the Clean Air Act defines "a group of tribes" as an eligible entity. Consistent with this definition, a tribal consortium is an eligible entity even if it is structured as a non-profit organization as long as its membership includes federally-recognized tribes. Similarly, an Alaska Native Corporation (ANC) is also an eligible entity as "a group of tribes" as long as its membership includes federally-recognized tribes. Note that tribes included in the application must be fully supportive of the non-profit or ANC submitting the application for the members of the consortium or ANC.

#### C. Award and Administration

Q1: What are key dates and deadlines of this grant program?

### A1: Key Dates for States

- **By March 31, 2023**, the lead organization for each state, DC, and Puerto Rico must submit a Notice of Intent to Participate (NOIP) to EPA by email to <a href="mailto:CPRG@epa.gov">CPRG@epa.gov</a>.
- **By April 28, 2023**, the lead organization must submit a complete application, which includes a workplan and budget for the planning grant, through Grants.gov.
- By summer 2023, EPA Regional Offices expect to award the grants (cooperative agreements).

### **Key Dates for Metropolitan Areas**

- By April 28, 2023, the lead organization for each metropolitan area must submit a Notice of Intent to Participate (NOIP) to EPA by email to <a href="mailto:CPRG@epa.gov">CPRG@epa.gov</a>.
- **By May 31, 2023**, the lead organization must submit a complete application, which includes a workplan and budget for the planning grant, through Grants.gov.
- By summer 2023, EPA Regional Offices expect to award the grants (cooperative agreements).

#### **Key Dates for Tribes and Territories:**

- After March 1, 2023, tribes and territories should coordinate with their EPA regional office to indicate their interest in participating.
- **By June 15, 2023**, the lead organization must submit a complete application, which includes a workplan and budget for the planning grants, through Grants.gov.
- By summer 2023, EPA Regional Offices expect to award the grants (cooperative agreements).

Q2: What information will be required for submitting a Notice of Intent to Participate (NOIP)?

A2: Eligible entities that elect to receive CPRG funding must submit a NOIP indicating the lead organization that will oversee and be responsible for managing grant funds and coordinating activities and deliverables under the planning grant program. Sample NOIPs are provided online at <a href="https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants#CPRGSampleDocuments">https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants#CPRGSampleDocuments</a>.

The NOIP from a state, DC, or Puerto Rico must include an attached letter or memo signed by an official within the relevant governor's (or DC mayor's) office, or the director of the designated agency. The NOIP from a metropolitan area must include an attached letter or memo signed by one of the following authorized officials:

- the office of the chief executive (mayor, county manager, etc.) of the designated lead municipality in a metropolitan area;
- the director of a local air pollution control agency;
- the director of a designated municipal agency in a metropolitan area; or
- the executive director (or equivalent) of an eligible regional organization selected to administer a metropolitan area award.

A metropolitan area NOIP must include a clear statement indicating which MSA the lead organization is representing.

Q3: Can we get an extension on submitting a NOIP?

A3: No, all NOIPs must be received by the due dates established in the <u>program guidance</u>: March 31, 2023, for states; April 28, 2023, for metropolitan areas.

Q4: Do I have to follow the NOIP/workplan/budget/timeline sample format you provided?

A4: No. The <u>sample formats</u> provided for the NOIP, work plan, and budget are provided for your convenience. Applicants may choose alternative formats as long as they include all the necessary information as described in the <u>program guidance</u>.

Q5: Will this grant require matching funds?

A5: No, this grant will not require matching funds from the recipient.

Q6: What will the duration of the planning grants be?

A6: Planning grant funds will be available for four years from date of award. Assuming that planning grants will be awarded in summer / early fall 2023, these funds could be used through summer/early fall 2027. The grant period for states and metropolitan areas is four years; tribes and territories may negotiate shorter periods for satisfying the requirements described in the <a href="mailto:program guidance">program guidance</a> (e.g., two or three years from the date of award).

#### New question posted 3-27-2023

Q7: For metro areas that are included in Table 2 of Appendix 15.2 of the CPRG planning grants program guidance for states, municipalities, and air pollution control agencies, but that are not large enough to qualify for the \$1 million in funding from the national metro area funding pool, would they need to submit an NOIP by April 28th to ensure they can receive funding in the event their state or other metro areas on the list end up declining?

A7: Yes, EPA is encouraging additional metropolitan areas beyond the presumptive list of 67 most populous MSAs to submit a Notice of Intent to Participate by April 28<sup>th</sup> to ensure they can receive funding in the event that funding becomes available to areas further down the list. EPA will maintain a list of eligible entities who have submitted a NOIP to accept planning funds as the designated lead organization for the state or MSA to help inform metropolitan areas about the likelihood of additional areas receiving funding. Please note that this will be a preliminary list as entities will still need to submit an approvable grant application to receive an award. The list is posted on the CPRG website at: https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants.

## New questions posted 4-21-2023

Q8. Do subawards need to be competed? Are there limitations on the size of subawards or the percent of the grant that can be used for subawards?

A8. There is no requirement to compete subawards (at any dollar amount). While there are no specific limits on the size of subawards or the total amount of funding that can be sub awarded, subrecipients can only receive reimbursement for their actual direct or approved indirect costs. Subawards must follow the <a href="Subaward Policy">Subaward Policy</a> and recipients must provide oversight and reporting on activities completed under any subaward.

Q9. What are the requirements around hiring contractors and consultants? Can recipients use existing contracts, or do they need to compete a new contract to complete work under CPRG?

A9: When procuring property and services under a Federal award, a recipient must follow requirements as described in 2 CFR Part 200 and here: <a href="https://www.epa.gov/grants/best-practice-guide-procuring-services-supplies-and-equipment-under-epa-assistance">https://www.epa.gov/grants/best-practice-guide-procuring-services-supplies-and-equipment-under-epa-assistance</a>.

Recipients may enter into competitively awarded long-term (generally not to exceed five years) contracts for professional services or equipment leases that include options for periodic renewals. If the long-term contract precedes the EPA assistance agreement, recipients may use that contract if it was procured competitively consistent with Federal financial assistance regulations (including Disadvantaged Business Enterprise considerations) in effect at the time.

Q10. What factors will Regional Offices consider in determining whether a grantee will need to develop a quality assurance project plan (QAPP)?

A10. It is EPA policy that all work funded by EPA in which environmental data will be collected, evaluated, used, or reported (including the use of existing data and modeling), or which involves the design, construction, and operation of environmental technology, have approved QA Project Plans, or

equivalent documents as defined by the funding organization's Quality Management Plan, quality manual, or similar quality system description. EPA Regional Offices will determine the QAPP requirements based on the proposed workplan so we encourage applicants to contact their regional office directly to discuss further. An approved QAPP is required prior to the start of environmental data generation. For general information, please visit: <a href="EPA's Quality Program">EPA's Quality Program</a> website.

- Q11. Does the CCAP require NEPA (National Environmental Policy Act) analysis?
- A11. Work funded under the CPRG Planning Grants is exempt from NEPA requirements
- Q12. Can a state sub-award funds to an MSA or tribe that is also receiving a direct CPRG grant?
- A12. Yes, a state may sub-award funds to an MSA or tribe that is a direct recipient of a CPRG grant. Subawards must follow the <u>Subaward Policy</u> and recipients must provide oversight and reporting on activities completed under any subaward.

# D. Allowable Activities

Q1: Can I spend planning grant funds to hire staff? What about to pay for consultants and contractors? Can I use it to give grants to a university, non-profit, or other government agencies?

A1: Yes, planning grant funds may be used to pay for staffing, contractual costs, and sub-awards related to the development, updating, or evaluation of state, municipal, or tribal plans to reduce climate pollution (i.e., to reduce greenhouse gas emissions or enhance carbon sinks). Sub-awards are allowed under this funding award, subject to terms and conditions. Additional details about allowed expenses and guidance on developing a budget are available in the program guidance.

Q2: What activities can planning grant funds be used for?

A2: CPRG planning grant funds must be used for projects and activities supporting the development, updating, or evaluation of state, municipal, or tribal plans to reduce climate pollution. In general, planning grant funds can be used for:

- Staffing and contractual costs necessary to develop the deliverables identified in the program guidance;
- Planning and implementing meetings, workshops, and convenings to foster collaboration among and between levels of government, the public, and key stakeholders;
- Outreach and education for stakeholders and members of the public;
- Subawards to municipalities, air pollution control agencies, regional planning organizations, non-governmental organizations (NGOs), academic institutions, etc.;
- Modeling and analytical costs, including purchase or licensing of software, data or tools;
- Studies, assessments, data collection, etc., needed to develop the required deliverables;
- Evaluation and metrics for tracking activities;
- Training and staff capacity-building costs;
- Supplies (e.g., office supplies, software; printing, etc.);

- Incidental costs related to the above activities, including but not limited to travel, membership fees, and indirect costs; and/or,
- Other allowable activities as necessary to complete the required deliverables.

Q3: Can I use CPRG planning funding to support adaptation/resilience planning? Can my climate plan include a chapter on adaptation planning?

A3: While the focus of the CPRG program is on reducing climate pollution, priority climate action plans and comprehensive climate action plans can include strategies that simultaneously support both greenhouse gas mitigation and climate adaptation. Grant recipients are encouraged to evaluate the resilience of planned projects and the adaptation related benefits of greenhouse gas reduction strategies within their plans. A grant recipient can use planning funds to address how a particular strategy addresses both GHG reduction and climate adaptation objectives (e.g., heat island strategies help reduce GHG emissions by reducing energy demand and help reduce health impacts due to extreme heat).

## New questions posted 3-27-2023

Q4: What activities can planning grant funds NOT be used for?

A4: Planning grant funds may not be used for any activity that does not contribute to the development, updating, or evaluation of state, municipal, or tribal plans to reduce climate pollution (i.e., to reduce greenhouse gas emissions or enhance carbon sinks).

In addition, costs must be <u>reasonable</u>, <u>allocable</u>, eligible, and allowable under the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards at 2 CFR 200, commonly known as the <u>Uniform Grant Guidance (UGG)</u>, and EPA's implementing regulations at <u>2 CFR 1500</u>. The Uniform Grants Guidance identifies certain costs that may not be charged to EPA assistance agreements under any circumstances. Examples include alcoholic beverages, interest on borrowed funds, and lobbying or litigation. For additional guidance, see:

https://www.epa.gov/sites/default/files/2019-05/documents/applicant-budget-development-guidance.pdf

Planning grant funds may NOT be used as matching funds for other federal grant programs.

Q5: Can CPRG planning grant funds be used to cover costs that are incurred before the official date that grant funds are awarded? For example, can you use planning grant funds to pay for a recently completed climate plan? What about if you are in the middle of developing a climate plan right now? [Question updated 4/14/2023]

A5: State and MSA recipients of CPRG planning grants may incur allowable "pre-award" project costs beginning on June 1, 2023, even if grant funds are not formally awarded until after that date. Tribal and Territory recipients of CPRG planning grants may incur allowable "pre-award" project costs beginning on June 15, 2023 even if grants are not formally awarded until after that date. All costs incurred before EPA makes the award are at the recipient's risk. EPA is under no obligation to reimburse such costs if for any reason the recipient does not receive a Federal award, or if the Federal award is less than anticipated

and inadequate to cover such costs. Such pre-award costs are allowable pursuant to EPA grant regulations at <u>2 CFR 1500.9</u>.

EPA's expectation is that applicants with existing climate plans should use planning grant funds to update or expand their existing plans and ensure they meet all of the requirements for the deliverables detailed in the <u>program guidance</u>.

Q6: Can grant recipients use planning grant funds to pay for stipends for stakeholders to attend public meetings or stakeholder engagement meetings?

A6: The CPRG planning grants <u>program guidance</u> for states, municipalities, and air pollution control agencies includes details on eligible program expenses on pages 23-24. Eligible expenses include planning and implementing meetings, workshops, and convenings to foster collaboration among and between levels of government, the public, and key stakeholders as well as outreach and education for stakeholders and members of the public. These eligible costs can include stipends to cover expenses to attend meetings associated with the program. More details are in EPA's Participant Support Costs Guidance available at: <a href="https://www.epa.gov/grants/rain-2018-g05-r1">https://www.epa.gov/grants/rain-2018-g05-r1</a>. Such costs would be categorized as Participant Support Costs, which belong in the "Other" budget category in a budget narrative or in the SF-424A.

Q7: Can CPRG grant funds be used to meet the matching funds requirement for another grant program?

A7: No, CPRG grant funds may not be used to meet the matching funds requirement for another grant program. Pursuant to EPA grant regulations at <u>2 CFR 200.306(b)(5)</u>, this use of CPRG funds would only be allowable if the plain language of section 137 explicitly authorized the use of these funds to meet the matching funds requirement for another program.

# New question posted 4-21-2023

Q8. Can multiple states, or a state and MSA, pool their funds to collaborate on specific analyses or deliverables?

A8. Each state and/or MSA that receives a planning grant will be responsible for completing the required program deliverables. However, multiple grant recipients and entities may coordinate on procurement of contractual services to ensure consistency in their work products. Multiple states and/or MSAs may also elect to sub-award funds to the same non-profit or academic institution to develop coordinated work products. States and/or MSAs may also choose to sub-award to other states or MSAs to facilitate coordination. In all cases, grant recipients must follow <u>procurement</u> and/or subaward policies. Each recipient must be able to identify and track how their funding was used to develop the required deliverables under the terms and conditions of their own grant.

# E. Required Plan Elements

Q1: The program guidance refers to both a "benefits analysis" and a "low-income, disadvantaged communities (LIDAC) benefits analysis." What is the difference between these two analyses?

A1: Geographic coverage is a key difference: the benefits analysis should apply to the entire plan jurisdiction, while the LIDAC benefits analysis applies only to those areas with communities identified as low-income and disadvantaged. Both analyses should include estimates of GHG and co-pollutant emissions reductions.

However, a benefits analysis for low-income and disadvantaged communities should assess benefits of GHG reduction measures within such communities. Examples of community benefits from GHG reduction measures include but are not limited to: co-pollutant emission reductions (e.g., criteria air pollutants and air toxics), increased climate resilience, improved access to services and amenities, jobs created and workforce development, and decreased energy costs from energy efficiency improvements.

# New questions posted 3-27-2023

Q2: If the GHG inventory isn't required until the CCAP, what is the basis for priority reduction measures identified in the PCAP?

A2: A GHG inventory is required as part of the PCAP. The PCAP inventory may be simplified or rely on pre-existing data, but it should be adequate to inform the inclusion of specific climate mitigation measures in the PCAP.

Q3: Is there a year in which the GHG inventory needs to have been conducted? We have completed one for 2019, is that recent enough?

A3: EPA is not requiring a specific GHG inventory baseline year; inventory years should be chosen based on availability of underlying data and to support development of GHG targets. In this case, using an existing 2019 inventory for the PCAP is appropriate if it is sufficient to inform the selection of GHG measures for inclusion in the PCAP; a grant recipient could then choose to update the analysis in their CCAP or Status Report as appropriate.

Q4: What flexibility is there to revise or update a PCAP or CCAP in subsequent years?

A4: The PCAP is due March 1, 2024, and EPA does not expect revisions to the PCAP after submittal. However, EPA expects that the measures, programs, and policies included in the PCAP will be updated as needed and incorporated in the more expansive CCAP, due in mid-2025 for states and metropolitan areas and at the end of the project period for tribes and territories. The third required deliverable under the CPRG planning grant, which applies only for states and metropolitan areas, is the Status Report, due at the end of the grant period (mid-2027). In this deliverable, grantees will be expected to provide an update to EPA on certain elements and information contained in the CCAP, including the implementation status of GHG reduction measures included in the CCAP. Grant recipients may choose to conduct updates beyond the timeframe of the grant period, but at this time, no additional funding is available to support this work.

Q5: What are the consequences if measures identified in a PCAP or CCAP are not implemented?

A5: As explained in the program guidance, both the Priority Climate Action Plan (PCAP) and Comprehensive Climate Action Plan (CCAP) must include quantified GHG measures. We encourage grant recipients to include a range of measures, to consider their authority and ability to implement such measures, and to identify funding opportunities to support implementation of those measures. However, the CPRG planning grant program does not impose consequences for entities that do not implement the measures in their PCAP or CCAP.

Funding to implement measures contained in the PCAP will be competed under the implementation grants phase of the CPRG program (see <a href="https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants">https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants</a>). Implementation grant recipients are expected to complete the work identified in their approved workplans. Remedies for non-performance may include withholding cash payments, disallowing costs, suspending or terminating the award, recovery of funds, or initiating suspension or debarment proceedings. See the Remedies for Noncompliance beginning under 2 CFR 200.339.

Q6: Are there consequences if a GHG target established in a PCAP or CCAP is not met?

A6: As explained in Appendix 15.3 of the CPRG planning grants program guidance for states, municipalities, and air pollution control agencies (or Appendix 14.2 of the CPRG planning grants program guidance for tribes, tribal consortia, and U.S. territories), comprehensive, economy-wide GHG reduction targets are encouraged but not required for the Priority Climate Action Plan (PCAP). A Comprehensive Climate Action Plan (CCAP) must include economy-wide near-term (e.g., 2030-2035) and long-term (e.g., 2050) GHG emission reduction targets (on a gross or net GHG emission basis), set for the state, territory, tribe, or metropolitan area. While GHG reduction targets are thus required in the CCAP, the CPRG planning grant program does not impose consequences for entities that do not achieve their stated GHG reduction targets.

Q7: Can you clarify the requirement for states to collaborate with local governments?

A7: State agencies are expected to coordinate with municipalities and air pollution control agencies in the development of key CPRG planning grant deliverables. The interagency collaboration process is intended to result in the identification and inclusion of measures in the state Priority Climate Action Plan (PCAP) and Comprehensive Climate Action Plan (CCAP) that can be implemented by collaborating entities. Please see pages 20-21 of the program guidance for states, municipalities, and air pollution control agencies under Section 8.4.3, "Coordination and Engagement" for additional details.

## New questions posted 4-21-2023

Q8. Does a plan need to contain every pollutant on the 'climate pollution' list?

A8. Section 137(d) of the Clean Air Act defines "greenhouse gas" as "the air pollutants carbon dioxide, hydrofluorocarbons, methane, nitrous oxide, perfluorocarbons, and sulfur hexafluoride." EPA expects that CPRG planning grant recipients will therefore consider sources, sinks, and reduction measures for these specific compounds when developing their deliverables under the program. The selection of GHG reduction measures should be based on GHG emissions information and focus on achieving the most significant GHG reductions possible, while considering other relevant planning goals. GHG reduction

measures may include both measures that reduce GHG emissions and/or measures that enhance carbon sinks.

Q9. How can states meet the requirement to collaborate work with municipalities within the state? What if municipal priorities and state priorities are not aligned?

A9. As defined in the program guidance, ongoing coordination as much as possible among state agencies, air pollution control agencies, and municipalities is expected for the development of the PCAP and over the duration of the cooperative agreement. This interagency collaboration process is intended to result in the identification and inclusion of priority measures in the state PCAP that can be implemented by collaborating entities.

There are multiple approaches states may take in collaborating with municipalities, including but not limited to: holding regular stakeholder meetings; publishing a Request for Information; establishing an advisory committee; providing sub-awards to support municipal planning (either directly to municipalities or to a 3<sup>rd</sup> party); conducting analysis or modeling to identify promising municipal GHG reduction measures; and providing data and analyses to municipal governments. Ultimately, the lead organization for the State is responsible for the final list of GHG reduction measures that are included in the PCAP and may align those measures with the State goals and priorities. However, States **must** include priority measures that are implementable by municipalities in the PCAP and must make the PCAP available to other entities for their use in developing an implementation grant application.

As a reminder, states and MSA's must also include meaningful engagement with low-income and disadvantaged communities in their plan development, and as noted above, regular stakeholder and community engagement can be an area of collaboration for states and other agencies and local governments. States are encouraged to use multiple strategies to increase the number and diversity of communities that participate.

Q10. Does the statement in the program guidance referring to the US goal of 50% GHG reduction by 2030 set an effective floor for applicants' GHG targets?

A10. The statement in the program guidance referring to the national U.S. commitment is not intended to be prescriptive for state, municipal, tribal, or territorial GHG reduction targets under this program. It was included in the guidance to provide context for the overall U.S. target that individual jurisdictions can help support. The U.S. target will be reached through a combination of complementary federal, state, local, and tribal regulations, policies, and programs as well as market forces and technological advancements. Accordingly, an individual state, municipal, tribal, or territorial target based on GHG reduction measures implemented at that level could still be consistent with the national US target even if it differs from the national target.

Q11. What information should recipients provide about implementation authority in their plans?

A11. For each GHG reduction measure included in the PCAP or CCAP, the grant recipient must indicate whether they have existing statutory or regulatory authority to implement the measure, or whether such authority still must be obtained. If action is required to obtain authority the plan must include a schedule of milestones for actions needed by key entities (e.g., legislature, administrative agency, etc.)

for obtaining any authority needed to implement each listed program or measure. Some measures may not require specific authority to implement. In this case, the plan may indicate that no such authority is required. In the Status Report, recipients should indicate progress towards meeting the milestones to obtain authority for proposed measures.

Note: Details about existing implementation authority are not required in the workplan. The workplan should provide a brief description of the applicant's expected approach/timeline to conduct a review of implementation authority.

Q12. What level of detail does a PCAP need to include?

A12. Section 15.3 "Deliverable Requirements" (page 49) of the CPRG planning grants program guidance for states, municipalities, and air pollution control agencies outlines required and/or recommended elements of the PCAP. A PCAP must include a focused list of near-term, high-priority, implementation-ready measures that have been identified for implementation by the lead organization and any other collaborating entities (e.g., municipalities, tribes). The selection of GHG reduction measures should be based on GHG emissions information and focus on achieving the most significant GHG reductions possible, while considering other relevant planning goals. GHG reduction measures may include both measures that reduce GHG emissions and/or measures that enhance carbon sinks.

For each measure, the PCAP must provide an estimate of the quantifiable GHG emissions reductions, the key implementing agency or agencies, implementation schedule and milestones, expected geographic location if applicable, milestones for obtaining legislative or regulatory authority as appropriate, identification of funding sources if relevant, and metrics for tracking progress. As cost information will be required for measures included in an implementation grant application, grant recipients are encouraged to plan ahead to include quantitative cost estimates in their PCAP.

While the PCAP does not necessarily need to identify specific GHG reduction projects by name and/or location, it should adequately describe the GHG reduction measures that will be implemented in the future. Measures must be described with enough detail such that implementation grant applicants can provide an estimation of future GHG reductions associated with the measure.

State plans are expected to encompass the geographic scope of the state and should include GHG reduction measures that apply broadly to the state to be implemented and evaluated at a state-wide level. States must coordinate with municipalities and air pollution control agencies within their state to also include priority measures that are implementable by those entities. States are further encouraged to similarly coordinate with tribes. The PCAP does not need to identify the specific names of other eligible entities (e.g., such as specific cities or counties) that may or may not implement a particular measure, however.

Metropolitan area plans are expected to cover the geographic scope of the individual sub-state jurisdictions (e.g., cities, counties, air pollution control agency districts) that comprise the metropolitan statistical area (MSA) as delineated by United States Office of Management and Budget based on U.S. Census Bureau data. Inclusion of neighboring jurisdictions, outside the boundary lines of the MSA, is allowed and encouraged. Metropolitan area plans should include GHG reduction measures that apply to the metro area broadly and that can be implemented by the municipalities comprising the metro area.

Q13. What factors will EPA consider in determining how an agency "meaningfully" engages with EJ communities?

A13. Key goals for engaging with low-income and disadvantaged communities (LIDACs) include:

- Fostering a spirit of collaboration, mutual trust, confidence, and openness;
- Ensuring timely, accessible and accurate information;
- Learning from individuals and organizations and the information they are uniquely able to provide (community values, concerns, practices, local norms, and relevant history);
- Keeping communities informed about significant issues and changes; and,
- Anticipating conflict, and encouraging early discussions, and utilizing conflict resolution.

Engagement strategies can cover multiple communities and should be inclusive of linguistic, cultural, institutional, geographic, and other differences to assure meaningful participation, recognizing that diverse constituencies may be present within any community. Meaningful engagement under the CPRG program should include early outreach, sharing information, and soliciting input on PCAP and CCAP development, especially in LIDACs. EPA strongly recommends that grant recipients provide evidence of meaningful engagement, a summary of engagement conducted, and a summary of the stakeholder input received and how the input was considered in formulating both the PCAP and the CCAP.

Q13 Many agencies and communities are already meaningfully engaged with each other – how can agencies use these existing relationships/data to avoid "engagement fatigue" by these communities?

A13. EPA believes that partnerships are vital to accomplish CPRG program objectives and expects all planning grant recipients will engage with communities and other stakeholders in the context of this new program. The agency has found communities to be generally receptive to proactive and continuous engagement if they feel and believe that the engagement is meaningful and beneficial.

However, applicants may describe in their workplans the process and results of any recent community engagement related to climate planning and how they expect to draw from those results to help meet the community engagement expectations for the PCAP and/or CCAP. For example, the workplan should describe how any prior engagement meets some or all of the criteria outlined in the program guidance and what additional steps they will take to meet this required element for the CPRG planning grant deliverables.

Q14. Can EPA offer guidance on the expectations for benefits analysis for low-income and disadvantaged communities?

A14. EPA aims to provide further guidance regarding benefits analysis for LIDACs on the CPRG website soon.

Q15. Will EPA require the use of certain tools to quantify emission reductions or identify overburdened communities (such as EPA's EJ SCREEN or Local Greenhouse Gas Inventory Tool)? Can agencies use their own tools?

A15. Regarding identifying overburdened communities, the <u>CEQ interim guidance</u> ("Addendum to the Interim Implementation Guidance for the Justice40 Initiative, M-21-28, on using the Climate and Economic Justice Screening Tool (CEJST)," Jan 27, 2023) gives EPA flexibility to use additional EPA

data/tools and to consider state tools in certain use cases. EPA is in the process of developing guidance and expects to have additional information soon.

Regarding emissions quantification, EPA provides multiple resources that can be used to help develop GHG emissions inventories; assess GHG or co-pollutant emissions reductions; or quantify other benefits at the state, tribal, and municipal level. EPA is not requiring the use of specific tools. More information can be found on the CPRG Tools and Technical Resources website: https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants#CPRG-ToolsandTechnicalResources.

# F. Implementation Grants

Q1: Does an eligible entity need to have received a planning grant in order to apply for an implementation grant? If a city or state already has a climate action plan and does not receive a planning grant, is it eligible for an implementation grant?

A1: A **state** or **territory** must have developed a Priority Climate Action Plan under a CPRG planning grant in order to be eligible for implementation funding.

However, a **tribe, municipality, or air pollution control agency** that did not directly receive a planning grant may apply for an implementation grant as long as the measures they propose for funding in an implementation grant application are covered by a PCAP. Collaborating partners who developed joint plans or regionally based plans would retain eligibility for implementation funds, regardless of who administered the planning grant. Municipalities and air pollution control agencies will also be eligible for funding for measures identified in their state's or metropolitan area's plan for implementation at their level. Tribes can also partner with a neighboring state or metropolitan area.

An entity may not rely solely on a pre-existing climate plan to apply for an implementation grant; their implementation application must be connected to a PCAP developed under a planning grant; but planning grant resources can be used to update existing plans, such as by considering impacts of newly available federal resources under the Inflation Reduction Act, the Infrastructure Investment and Jobs Act, and other federal resources.

Q2: It sounds like we can't use our existing climate plans and skip directly to the implementation phase. Is that true, and if so, why?

A2. The statute establishes that implementation grants must be awarded to fund plans developed under a CPRG planning grant. EPA anticipates that applicants with existing climate plans could use planning grant funds to update or expand their existing plans and ensure they meet the requirements for the Priority Climate Action Plan detailed in the <u>program guidance</u>. This approach will provide flexible support and equal funding opportunities to state, territory, local, and tribal governments regardless of where they are in their climate planning and implementation process.

Q3: How will EPA select recipients of the competitive implementation grants? What criteria will be used?

A3: EPA expects to issue the notice of funding opportunity (NOFO) for the implementation grant program later this year, with applications due in the first quarter of calendar year 2024. The NOFO will describe the criteria by which implementation grant applications will be reviewed and scored. More information will be available in the coming year.

Q4: Why is the implementation grant deadline so close to the date that planning grants will be awarded? How are we supposed to complete a climate plan in less than 1 year?

A4: The EPA's accelerated pace for awarding planning grants reflects the urgency for action that climate change demands and is intended to put these funds to work as quickly as possible. The planning grant process will accommodate immediate, priority planning that can be used to prepare for the implementation grant application as well as longer-term, comprehensive climate planning efforts over the duration of the planning grant period and beyond. Applicants will not need to submit a comprehensive climate action plan for the implementation grant competition, but will be able to propose a priority plan focused on ambitious, implementation-ready policies and programs.

Q5: Can you provide more details about the implementation grants? How many, what size, what types of projects you will prioritize? Will there be a tribal set-aside for the implementation grants as well?

A5: The implementation grant program is under development. More information about the number and size of grants to be awarded as well as evaluation criteria and any funding priorities will be available in a Notice of Funding Opportunity (NOFO) to be published later this year. EPA anticipates awarding implementation grants to all categories of eligible entities and expects that there will be a tribal set-aside.

#### New questions posted 4-21-2023

Q6. For the competitive portion/second phase of the program – will individual entities be applying for these grants, or will it still be MSAs (and all the local government entities within them) applying as a group?

A6. As noted in the call-out box on page 19 of the Climate Pollution Reduction Grants program guidance for states, municipalities, and air pollution control agencies, "... an entity that did not directly receive a planning grant may apply for an implementation grant provided that the measures they propose for funding are covered by a [Priority Climate Action Plan]. Collaborating partners who developed joint plans or regionally based plans would retain eligibility for implementation funds, regardless of who administered the planning grant. *Municipalities and air pollution control agencies will also be eligible for funding for measures identified in their state's or metropolitan area's plan for implementation at their level."* (emphasis added). Municipalities may choose to apply for implementation grants individually, as an MSA, or as a sub-set of the MSA.

Q7. Since implementation grants are competitive, how likely is it that funding will be available or depleted for agencies that need more time to develop their plans? Will agencies that just have to update existing plans be able to use up the funds?

A7. EPA expects to issue the notice of funding opportunity (NOFO) for the competitive implementation grant program later this year. The NOFO will include information about the number and size of grants to be awarded, timing, and the criteria by which implementation grant applications will be reviewed and scored. The structure of the CPRG program allows jurisdictions new to climate planning time to identify priority measures and compete on an equal timeline with those with more extensive climate planning experience.

# G. Miscellaneous

Q1: What technical assistance will EPA provide to assist grant recipients?

A1: EPA is compiling publicly available tools and technical resources to assist eligible entities in developing and updating climate plans. An initial list of tools and technical resources is posted on EPA's <a href="Mailto:CPRG">CPRG website</a> and will be updated periodically. These tools and resources will be supplemented with additional technical assistance. More details will be provided soon.

Q2: How will this program intersect with other IRA programs, like the Greenhouse Gas Reduction Fund (GHGRF) or the Environmental and Climate Justice (ECJ) grants?

A2: EPA hopes that grant recipients will design plans that are broad and cover a variety of programs and projects that could be implemented by a range of eligible entities. We encourage grant recipients to use their planning funds to identify opportunities to leverage other federal funding (including but not limited to funds available under the GHGRF and ECJ grants) to implement their plans.

With respect to the implementation grants, applicants are not prohibited from submitting the same or similar competitive or non-competitive application(s) for funding to EPA and/or other federal agencies. However, if an applicant does so, and the application (or a similar one) submitted under the EPA's future implementation grant solicitation is also selected for funding under a different EPA grants program and/or another federal agency's grants program, that may affect their ability to receive an award.

## New questions posted 3-27-2023

Q3: The Inflation Reduction Act specified \$27B for greenhouse gas reduction. The Climate Pollution Reduction Grants program allocates ~\$5B. Where and in what form might the rest of money be allocated?

A3: The Inflation Reduction Act established \$27 billion for the creation of a Greenhouse Gas Reduction Fund (GHGRF). The GHGRF program is independent from the Climate Pollution Reduction Grants (CPRG) program, which separately establishes a \$5 billion grant program for states, air pollution control agencies, municipalities, and tribes to develop and implement climate action plans. For more information about the GHGRF program, please see: <a href="https://www.epa.gov/greenhouse-gas-reduction-fund">https://www.epa.gov/greenhouse-gas-reduction-fund</a>.

#### New questions posted 4-21-2023

Q4. How will the Climate Innovation Teams be structured?

A4. Climate Innovation Teams will be a cohort-based approach to providing technical assistance that combines support from federal and external experts with collaborative peer learning and community building. Members of a team will be able to participate thorough a combination of virtual meetings (i.e., webinars and trainings), online collaborative spaces to share resources and best practices, and an optional, in-person, annual meeting. The topics and teams will be driven by the grant recipients' identified needs and interests; possible topics include but are not limited to GHG inventories and quantification approaches, climate planning, stakeholder engagement, sector-based strategies, workforce development, and/or regionally based teams. For more information, please see section 14.2 of the program guidance for states, municipalities, and air pollution control agencies.

Q5. Who do we write to with suggestions for topics and structure for the Climate Innovation Teams?

A4. Applicants may include suggestions for topics or other suggestions about the Climate Innovation Teams in their workplans, or they may make such suggestions to the regional EPA staff they are working with.

Q6. Can agencies get access to the GLIMPSE model? That would be very helpful.

A6. EPA is working to make GLIMPSE available to the public in the near future. Once it is approved for release, we will provide training to CPRG grantees on how to use the tool.

### New question posted 6-22-2023

Q7. Will IRA section 60105(g) be implemented alongside Climate Pollution Reduction Grant (CPRG) funds?

A7. In Section 12.7 of EPA's Program Guidance for the CPRG planning grants, <sup>1</sup> EPA stated that it is considering administering the IRA section 60105(g) grants for greenhouse gas and zero-emission vehicle standards under the implementation grant phase of the CPRG. After careful consideration, EPA has decided the IRA section 60105(g) provision will be implemented as a stand-alone grant program, independent of the CPRG program. This program allocates \$5 million for states that are adopting and implementing greenhouse gas and zero-emission onroad vehicle standards as permitted under Clean Air Act section 177. However, states may consider including the adoption and implementation of California GHG and zero-emissions standards as potential GHG reduction measures under the CPRG, consistent with EPA's guidance. EPA will provide additional details on the IRA section 60105(g) grant program separately in the future.

<sup>&</sup>lt;sup>1</sup> Climate Pollution Reduction Grants Program: Formula Grants for Planning: Program Guidance for States, Municipalities, and Air Pollution Control Agencies, March 1, 2023.

#### New section added 3-27-2023

# H. Metropolitan Area Awards

Q1: Are there maps showing what cities are considered part of a Metropolitan Statistical Area (MSA)?

A1: The U.S. Census Bureau website has maps for each state showing what counties make up each MSA at: <a href="https://www.census.gov/programs-surveys/metro-micro/geographies/reference-maps.html">https://www.census.gov/programs-surveys/metro-micro/geographies/reference-maps.html</a>. In the six New England states (CT, MA, ME, NH, RI, VT), MSAs are comprised of cities and towns and referred to as New England City and Town Areas (NECTAs). These states should use the link titled "New England City and Town Areas Map (March 2020)." For all other states, refer to the link titled "2020 State-based Metropolitan and Micropolitan Statistical Areas Maps."

Q2: Are there lists of jurisdictions included in each Metropolitan Statistical Area (MSA)?

A2: The U.S. Census Bureau provides spreadsheets showing what counties, cities, and towns are included in MSAs at: <a href="https://www.census.gov/geographies/reference-files/time-series/demo/metro-micro/delineation-files.html">https://www.census.gov/geographies/reference-files/time-series/demo/metro-micro/delineation-files.html</a>. Under the section titled "Core based statistical areas (CBSAs), metropolitan divisions, and combined statistical areas (CSAs)," there is a March 2020 file which provides the most updated crosswalk between MSAs and counties.

Under the section named "Principal cities of metropolitan and micropolitan statistical areas," there is a March 2020 file which provides the most updated crosswalk between MSAs and the main cities therein. Similar files are also available for the New England states (CT, MA, ME, NH, RI, VT) where MSAs are comprised of cities and towns and referred to as New England City and Town Areas (NECTAs).

Q3: Does every jurisdiction in an MSA need to provide a letter of commitment/collaboration?

A3: There is no requirement or expectation that every jurisdiction in an MSA provide a letter of commitment. The lead organization should collaborate with other jurisdictions in their MSA to the extent possible; however not all jurisdictions are required to participate in order for EPA to award a cooperative grant for a metropolitan area.

Q4: What happens if part of metropolitan area decides not to participate? Are the other jurisdictions within the area still eligible?

A4: There is no requirement that every jurisdiction in an MSA actively participate. The lead organization should collaborate with other jurisdictions in their MSA to the extent possible; however not all jurisdictions are required to participate in order for EPA to award a planning grant for a metropolitan area. A lead organization must consider the entire MSA region in developing deliverables, even if not all areas participate.

Q5: If there are two air agencies in one MSA, how will funds be distributed? Would the lead agency be responsible for divvying out the funds or would each agency that is part of a "metro area" be able to get money directly?

A5: One lead organization must be identified to receive and administer the grant on behalf of the MSA. EPA will make only one award to a metropolitan area for the planning grant. It is up to the lead organization (in consultation with their collaborating partners) to decide whether or how to subaward funds to other entities within the MSA.

#### New questions posted 4-21-2023

Q6. How can smaller local governments that will not receive planning grants engage with states?

A6. As defined in the program guidance, states must conduct ongoing coordination as much as possible with municipalities in the development of the PCAP and over the duration of the cooperative agreement. In particular, this must include meaningful engagement with low income and disadvantaged communities. This interagency collaboration process is intended to result in the identification and inclusion of priority measures in the state PCAP that can be implemented by collaborating entities. States **must** include priority measures that are implementable by those entities in the PCAP and must make the PCAP available to other entities for their use in developing an implementation grant application.

EPA has published the list of states that have submitted a Notice of Intent to Participate along with the lead organization that has been identified for each state. Municipalities who are not receiving planning grants are encouraged to:

- reach out to contacts at that state agency to learn more about how they intend to conduct this coordination
- monitor state agency websites or newsletters for announcements about coordination opportunities
- collaborate with neighboring communities or municipal groups to identify shared priority GHG reduction measures and best practices that can inform state plans
- share existing municipal climate, energy, or sustainability plans, programs, and policies with the state
- take advantage of any training, funding, or capacity-building initiatives the state may choose to implement [note, states are not required to offer such initiatives].

Q7. Is there a minimum number of letters of commitment required to be submitted along with a NOIP?

A7: No, there is no minimum number of letters of commitment required to be submitted along with a NOIP. However, EPA strongly recommends a high degree of collaboration amongst a wide range of organizations (such as state agencies, air pollution control agencies, municipalities, regional organizations, community organizations, universities, tribes, and so on) in the development of climate action plans. The process of developing letters of commitment can be a useful early step in building or expanding a coalition to develop a new climate plan or to update an existing one.

# New section added 4-21-2023

# I. Workplan Development

Q1. How detailed does my workplan need to be?

A1. The workplan is a high-level description of the planned approaches, responsible entities, timeline, and budget for developing each of the required deliverables (PCAP, CCAP, Status Report). The workplan must also include a discussion of planned interagency coordination and stakeholder engagement, outputs, outcomes, and performance measures. The workplan and budget detail must provide enough information for EPA to assess whether the proposed expenses are reasonable and allowable, and whether the planned approach and schedule is likely to lead to the successful completion of all deliverables and grant requirements. Applicants are **not** expected to include actual inventories, proposed GHG reduction measures, projected emission reductions, or reduction targets in their workplan. There is also no requirement that applicants conduct stakeholder outreach in advance of submitting their workplan.

For more details on the specific information required in the workplan, please see section 8.4 of the program guidance for states, municipalities, and air pollution control agencies (Section 7.4 in the program guidance for tribes and territories.)

- Q2. Do I need to include expected/quantified GHG reductions in the Outcomes section of the workplan?
- A2. In their narrative workplan, applicants must describe environmental outputs and outcomes to be achieved under the cooperative agreements and the performance measures and metrics they expect to use to track progress toward those outputs and outcomes. Outputs and outcomes may be qualitative or quantitative. To the extent that outputs and outcomes can be quantified at the time of workplan submittal, those quantitative values should be included. For example, outputs related to stakeholder engagement could include the number of stakeholder meetings included in the budget and timeline (if known). Outputs and outcomes may be included more generally and quantified at a later date (e.g. tons of GHG reductions or economic savings).
- Q3. Do I need to provide a separate timeline for each required element of the deliverables, or can I aggregate everything into one master timeline (similar to the sample timeline provided)?
- A3. Applicants may create an aggregated timeline for the entire project and reference it as appropriate in the discussion of specific elements or activities. Narrative information to support the timeline should also be included in the description of each deliverable.