

Middle Georgia Emissions Reduction Program

Workplan for Climate Pollution Reduction Grants General Competition

1. OVERALL PROJECT SUMMARY AND APPROACH

a. Description of GHG Reduction Measures

The Middle Georgia Regional Commission (MGRC) proposes to implement the “Middle Georgia Emissions Reduction Program” utilizing a Climate Pollution Reduction Grant (CPRG) Implementation Grant. MGRC is a district/regional governmental entity, equivalent to a council of governments. MGRC is one of twelve regional commissions created under O.C.G.A. § 50-8-30, *et. seq.* As such, MGRC is an eligible applicant under the “municipality” category, as defined under Clean Air Act section 302(f). While MGRC proposes sub-awards to other local government entities within its service area, this proposal is designed with MGRC as a single applicant, rather than the lead of a coalition. As such, this project should not require a formal Memorandum of Agreement (MOA).

To provide historical context, Middle Georgia cities and counties have been leading efforts to reduce emissions of Greenhouse Gases (GHG), Criteria Air Pollutants (CAP), and Hazardous Air Pollutants (HAP) since the early 2000s. As such, few communities can demonstrate a similar commitment to GHG reduction measures as Middle Georgia. This long-term commitment should also help to assuage concerns about the risks inherent with the implementation of a project of this size and scope. Middle Georgia is serious about proactive partnerships to reduce emissions. In 2003, communities of the region established the Middle Georgia Clean Air Coalition (MGCAC) following the initial recommendation from the Georgia Environmental Protection Division (EPD) to the U.S. Environmental Protection Agency (EPA) regarding the designation of two (and part of a third) counties in non-attainment of the National Ambient Air Quality Standards (NAAQS) for 8-Hour Ozone. This was a designation that would directly harm the region’s economy and would particularly endanger the standing of Robins Air Force Base under a potential base realignment and closure (BRAC) action. The purpose of the MGCAC is to develop a long-term regional response to air quality issues while encouraging economic growth and ensuring the health and economic well-being of residents. These goals have been successfully pursued in concert for the past 20 years.

The greatest difference between the Middle Georgia Clean Air Coalition and so many other efforts that have developed since 2003 has been the continued participation and dedication of the local elected officials. These individuals have been tireless champions for improving air quality and planning for a renewable energy future in the region. Staff members of each local government also regularly attend the monthly MGCAC meetings to stay abreast of the latest trends in energy policy and engage in local actions to support air quality. Local staff members engage with one another on issues of transportation and energy policy and advise elected officials on opportunities available to the Middle Georgia Clean Air Coalition. These past efforts have already led to large-scale projects. Over the past five to seven years, the MGCAC has implemented diesel engine conversions with Norfolk Southern that eliminate 1.2 tons of PM2.5 annually and 33 tons of NOx annually. The region’s Solarize Middle Georgia campaign also led to newly installed solar capacity to offset over 600,000 lbs. of CO2 per year. Finally, in a partnership led by Georgia Power and the Central Georgia Joint Development Authority, the MGCAC and MGRC worked to bring 128 MW of new solar capacity into service near Robins Air Force Base. In the most impactful emission reductions to date, this project offset 168,880 tons of CO2 emissions annually, as calculated by EPA’s AVERT model.



Since MGCAC does not have paid staff, MGRC has administered these efforts for over a decade, including throughout the region's participation in the EPA Advance Program, a voluntary agreement to reduce emissions beyond the requirements of the Clean Air Act. This history demonstrates the region's commitment to successful project implementation.

As a member of the EPA Advance Program, MGRC has worked with its MGCAC communities to develop a "Path Forward" Document. This original document was prepared in 2014 and includes an annual update of key goals and priorities. Among the current key priorities of this plan are preparing for electric vehicle transitions and implementing green, efficient, and healthy buildings. While this document does not itself constitute a Priority Climate Action Plan (PCAP), MGRC submitted this document for consideration during the stakeholder involvement process of Georgia's PCAP, the Peach State Voluntary Emission Reduction Plan (PSVERP), which was publicized on March 8, 2024. Several Middle Georgia priorities were included in this final document.

While MGRC cannot speak to the decisions made by the State of Georgia regarding its PCAP, the priorities of the Middle Georgia Path Forward Strategy are closely aligned with the region's greatest needs related to GHG and CAP reduction. Through previous work with Georgia Power at Plant Scherer (one of the nation's largest coal-fired power plants) and with Norfolk Southern at Brosnan Yard (one of the railroad's largest classification yards on the eastern seaboard), Middle Georgia leaders have managed to address major point sources of pollution within the region. The recent tightening of PM2.5 standards has brought renewed scrutiny to several large industrial facilities, however, many measures implementable with local control have already been undertaken. Future strategies of the MGCAC and MGRC will focus on operational efficiencies that allow for greater electrification of homes and vehicles while shifting the electric distribution sources to sustainable power sources such as solar or renewable natural gas. This action is beyond the full scope of what can be accomplished by one region. However, they do represent implementable steps that can start driving more widespread adoption.

With these local priorities in mind, along with the PSVERP, there are three project areas that MGRC has identified for inclusion in the Middle Georgia Emissions Reduction Program. These include Zero-Emission Buses, Landfill Gas Management and Utilization, and Home Weatherization and Energy Efficiency Improvements. Additional information is available in each section below.

GHG Reduction Strategy 1: Zero-Emission Buses (PSVERP, pg. 29).

In Georgia, the transportation sector accounts for 38% of overall emissions. The proposed strategy addresses emissions from the transportation sector by electrifying vehicles. Although the increased use of electricity may lead to minor increases in short-term emissions, the long-term trajectory of fleet electrification is for a cleaner electric grid that can significantly reduce GHG over time. This assumption is supported by work that has already been done to begin cleaning up the power grid in Middle Georgia and across the southeastern United States.

Major tasks for implementation will include the development of bid specifications, a bidding process, and then the assembly and shipping of the final product. By reaching the early milestones within the first six months, this project will be able to accelerate as quickly as the manufacturer can be notified. The proposed sub-awardee of these funds will be the Macon-Bibb County Transit Authority (MTA), which has already managed several similar projects in the past. Furthermore, funding is already secured for an expansion of the MTA's charging infrastructure. This past history indicates that this programmatic element is a very low risk for EPA.



GHG Reduction Strategy 2: Landfill Gas Management and Utilization (PSVERP, pg. 37).

This strategy addresses emissions from various waste streams in Georgia that end up in municipal landfills and contribute to the state's methane and CO₂ emissions. In 2021, municipal landfills accounted for 5.3% of the state's net emissions. This measure allows for the generation of alternative fuels at landfill sites.

The development and expansion of gas collection and control systems (GCCS) can reduce emissions in multiple ways. First off, the system's collection and capture element can prevent the uncontrolled emission of methane and CO₂ into the atmosphere. This capture process also helps to reduce odors and nuisances associated with having a landfill as a neighbor. Furthermore, once the landfill gas can be combusted to create electricity, it burns considerably cleaner than other forms of fossil fuels, especially those that have come from facilities like the region's Plant Scherer—at one point, the largest coal-fired power plant in the western hemisphere.

Implementation of this project will be the most complex, as it requires a formal engineering and construction process before the system can go live. However, Houston County is the ideal partner for this project. Houston County installed its first landfill gas system in 2003 as one of the earliest adopters of green energy technologies. Not to be content with simply being an early innovator, the community known as "Georgia's Most Progressive County" has since expanded its operations to continue its commitment to emission reductions. Again, relying on Houston County's history and experience, Middle Georgia believes it will be able to effectively mitigate programmatic risks. Certainly, delays in the manufacturing and shipping process are major concerns, as well as the completion of engineering and construction in a timely manner. However, by starting this project soon after the award date, the project can assuredly be completed within the grant program's five-year performance period.

GHG Reduction Strategy 3: Home Weatherization and Energy Efficiency Improvements (PSVERP, pg. 32).

The residential sector was responsible for 6% of Georgia's emissions in 2021. In addition, this sector has the greatest direct impact on Georgia's low-income residents. In the State of Georgia's PCAP, home weatherization and the purchase of energy-efficient products were listed as two separate implementation measures to reduce GHG emissions. However, from the perspective of MGRC, these two efforts can work hand in hand as part of a combined initiative to reduce emissions while also improving quality of life. This program will include household improvements that increase the energy efficiency of homes by sealing gaps and cracks, improving heating and cooling systems, adding insulation, and transitioning to more energy-efficient and electric products.

The process for these improvements will be a program administrator screening applicants to ensure they qualify as low-income households and then connecting them with qualified contractors who will make energy efficiency improvements utilizing grant funds. These programs have already existed in the nation for many years and can allow residents to save nearly \$300 per year on energy bills with public investment of up to \$5,000. Local partners estimate that for many homes across Middle Georgia, up to \$20,000 could be spent per household on various improvements that generate additional efficiencies and reduce emissions of greenhouse gases. Critically, existing programs often stop short of permitting "fuel swapping" where an older gas fixture could be replaced with a newer, more efficient electric component. EPA funding does not come with the same restrictions, allowing the emission reduction benefits to potentially be even greater than seen in past programs.

The risk in this strategy comes from the need to secure contractors for the programmatic activities while also ensuring that the general construction contractors are available to make improvements and do so in compliance with the appropriate federal rules and regulations. Major tasks of this milestone begin with



the procurement by MGRC of a contractor to manage the programmatic implementation of the weatherization improvements. This will be a competitive process involving a request for proposals (RFP). However, several nonprofit organizations exist within the region that have already implemented these programs in the past. All local providers with experience have already been notified that this opportunity may be coming so that they can respond effectively to the RFP.

Once selected, the successful program administration contractors will need to publicize the availability of these funds in collaboration with MGRC. Furthermore, qualified general construction contractors will need to be identified and procured for their services. However, because similar programs already exist, MGRC believes that the risk can be effectively mitigated through the experience that will be requested from respondents to the RFP. Furthermore, many existing agencies already have lengthy waitlists for services that may still extend beyond the availability of funding from this effort. However, if successfully awarded, these investments should be able to slash waitlists for weatherization services by as much as 75 percent—helping to get more comprehensive services to residents in a faster time.

Collectively, all these measures are expected to meet the programmatic goals of the Climate Pollution Reduction Grants as they reduce emissions of GHG and CAP. Furthermore, many of these improvements will be targeted toward low-income families and historically disadvantaged communities. These considerations are discussed further throughout the remainder of the work plan. The organization of each of these elements will be critical to their success. However, by working with experienced partners and leveraging the organizational capacity of MGRC, each GHG reduction strategy will be launched with a clear picture of the end goal and with recognition of the intermediary steps as discussed above.

b. Demonstration of Funding Need

As stated earlier, the Middle Georgia Path Forward Strategy highlights a number of proposed projects that can be implemented to support regional goals of emissions reduction and air quality improvement. While the flexibility of the Climate Pollution Reduction Grant is tremendous, MGRC is focused heavily on meeting the financial needs that cannot be met in other places. For example, while the Georgia PCAP lists electric vehicle infrastructure as a potential strategy for GHG reductions, MGRC has already identified another source of funding—the U.S. Department of Transportation’s Charging and Fueling Infrastructure (CFI) program, which it believes will more effectively meet the needs of the region. MGRC applied for this funding once before in 2023 and was unsuccessful, however.

Likewise, in 2022, MGRC applied to the Rural Energy Pilot Program (REPP) from USDA. This project would have funded experimental microgrid technologies within a pair of rural Middle Georgia communities. While this innovative approach to rural electricity generation could have had a transformative impact, this application was likewise unsuccessful. Middle Georgia, especially among predominately rural areas, is particularly ambitious in its desire to innovate technologically and sustainably for a stronger future. Unfortunately, this ambition does not often carry forward in the sense of financial capital necessary to make such bold decisions. Many of the region’s most rural communities are experiencing a decline in their tax bases as residents continue to abandon parts of the countryside for more urban and suburban environments. Even the large city of Macon-Bibb County has seen only modest growth for the past several decades. As a result, outside funding from the state or federal government is often a prerequisite for innovation in the region. The MTA is one agency that has been successful with implementing electric bus replacements through grant funding. However, even in this case, CPRG would drastically accelerate MTA’s ability to replace the aging buses within its fleet. As the region continues to face high GHG emissions while also attempting to stay in attainment of the PM2.5 National Ambient Air Quality Standards, time is of the essence in replacing MTA’s old diesel bus fleet with newer and cleaner models.



In Houston County, no such funding programs have been available for the expansion of the county's landfill gas capacity. The EPA's Landfill Methane Outreach Program (LMOP) is a very helpful resource for helping communities take the first steps needed for their landfill gas systems. However, the funding structures often rely on private investors or public bond financing. As a community that attempts to avoid taking on debt unless necessary, this makes the expansion of the landfill gas system in Houston County very difficult without an option for grant funding such as this one. It also helps make the economic case for maximizing emission reductions.

Finally, the Department of Energy (DOE) already funds weatherization programs throughout the region. However, this funding is insufficient for the high level of need that exists in Georgia communities. Hundreds of families across the broader central Georgia area require assistance with home weatherization or could benefit from investments in more energy-efficient appliances. For these residents, the electricity bill is not just a matter of indicating emissions but can also be a threat to one's livelihood if residents are frozen in a place with unsatisfactory climate control. Weatherization reduces medical bills as well as energy bills, but many residents still face these higher bills because weatherization funding has not been made available yet. Further, with DOE programming restrictions, the funding of the CPRG program is essential to making sure that the highest priority improvements can be made. Today, households may not have the flexibility to shift their source of fuel to a more efficient appliance under existing DOE programs. The Middle Georgia Emissions Reduction Program would solve that issue.

To continue implementing GHG reduction measures beyond the scope of this project, MGRC intends to resubmit an application to the CFI program. MGRC has developed ambitious plans with its procured contractor, ChargePoint to fill in gaps in the regional EV charging infrastructure network with the goal of having a community charger available within a 15-minute drive from anywhere in the region. This project should be able to make substantial reductions in GHG emissions when it is fully implemented.

Furthermore, MGRC has been exploring a SolSmart designation and has worked extensively to make solar power installations (either at the rooftop scale or utility scale) more attainable and streamlined. The potential solar initiatives did not make the cut for inclusion in the PSVERP. However, MGRC and the MGCAC will continue to promote the usage of solar energy power purchase agreements and other financing mechanisms to make solar power more cost-effective for end users.

c. Transformative Impact

Looking forward, the MGCAC is the type of organization that can demonstrate transformational impacts across the nation, provided that enough funding is made available. Joseph Goffman, Assistant Administrator for Office of Air and Radiation at the U.S. EPA, once gave the MGCAC his highest praise, referring to the organization as, "the holy grail of the Clean Air Act." Few other regions or organizations have been able to successfully develop partnerships in the same way over the past 20 years. The spirit of regionalism in Middle Georgia which brings leaders together to implement lasting change has been key to these efforts. As such, Middle Georgia would be among the ideal communities to champion the promise of economic growth and prosperity through a commitment to cleaner air quality and greater environmental sustainability. As stated earlier, the region does not lack ambition—merely resources.

MGRC has been a key partner to the EPA in the past as well. As a regular participant in the Region 4 EPA Advance Program forums that have been held across the southeast, MGRC is always eager and excited to share how the region's successes can be replicated in other areas. MGRC's project manager for the Middle Georgia Clean Air Coalition volunteered to serve on the inaugural EPA Advance Program Stakeholder



Advisory Committee in 2021. Likewise, MGRC staff have joined the Georgia Planning Association's Climate Advisory Committee. These recognitions and collaborations show that MGRC is as highly invested in partners being able to replication Middle Georgia's successes as it is in the region's own achievements. The investments of the CPRG program, as influential and unprecedented as they are, cannot alone stem the tide of rising GHG emissions unless success stories are collaboratively shared across communities. Middle Georgia can take a leading role in this community of practice—especially noting that if these activities are possible in a resource-scare region like Middle Georgia, they are certainly feasible in the nation's larger and more economically prosperous communities.

Considering these multiple project impacts cumulatively, Middle Georgia is the community in which to attempt a transformational impact. While the practices may not be extremely novel, the concentration of partners and problem-solvers combined with accelerating development in green energy can help Middle Georgia take a statewide and national lead as a model for sustainability in a traditionally rural and underdeveloped space.

2. IMPACT OF GHG REDUCTION MEASURES

a. Magnitude of GHG Reductions from 2025 through 2030

Additional information may be found in the technical appendix. A highlight of quantified GHG reductions can be found in this section.

GHG Reduction Strategy 1: Zero-Emission Buses (PSVERP, pg. 29).

As a greenhouse gas emission reduction action, the Middle Georgia Regional Commission and sub-awardee Macon-Bibb Transit Authority (MTA) prioritized the purchasing of 4 Zero-Emission Buses to replace current diesel vehicles. This activity aligns with those efforts of the State of Georgia in the Peach State Voluntary Emission Reduction Plan (PSVERP), under priority Strategy and Measure 1.1.

In support of the State of Georgia Emission reduction goals, the Middle Georgia Regional Commission application follows the guidance of the PSVERP two scenario method of estimating emission reductions. Impacts from weatherization of residential buildings are compared by Scenario 1, Business-as-usual (BAU), and Scenario 2, Policy Scenario. Scenarios were calculated utilizing the Rocky Mountain Institute's Energy Policy Simulator for both the near-term (2025-2030) and long-term (2025-2050).

As stated in Georgia's PSVERP, the policy scenario attempts to replace 50% commuter and school buses with electric buses by the year 2050. As a priority reduction measure, the estimated cumulative emission reductions (MMTCO_{2e}) in the near-term of 2025 – 2030 by the State of Georgia in the PSVERP is -0.001 MMTCO_{2e} per bus. The total cumulative emission reduction in the near-term for the replacement of 4 buses was determined by multiplying -0.001 MMTCO_{2e} by 4. Based on the guidance of the policy scenario total cumulative emission reduction for the weatherization of all residential structures is -0.004 MMTCO_{2e}.

GHG Reduction Strategy 2: Landfill Gas Management and Utilization (PSVERP, pg. 37).

Houston County Georgia Board of Commissioners, operates the State Route 247 Municipal Solid Waste Landfill (SR247 MSW Landfill, ID# 457), located at 2080 Ga. State Route 247, Kathleen, Ga. The MSW Landfill has operated since 1987 and the projected closure date is the year 2227. In 2003 Houston County installed a gas collection system and flare station to serve Phase I Landfill. The second gas collection system to serve Phase II was added in 2009. By 2011 Houston County, Flint Energies and Power Secure started the landfill gas to power generation plant to serve Phase III, while phase IV came on operation. Phase V opened in 2014 and is reaching capacity. The Landfill Methane Outreach Program (LMOP) of EPA



reports that in 2021 there was a total of 3,907,519 tons of waste in place. The Houston County MSW reduces methane emissions using a Reciprocation Engine system for capture. A total of 1.05 million standard cubic feet per day (MMSCFD) is captured at the site. The current operation has a direct emission reduction of 0.0921-Million Metric Tons Carbon Emission Equivalency per year (MMTCO_{2e}/yr), and emission reduction avoided of 0.0088 MMTCO_{2e}/yr.

As Houston County plans forward to Phase VI of its landfill expansion, additional gas collection infrastructure is needed to maintain methane emission reductions and limit GHG escaping to the atmosphere. Priority strategy and measure 4.1 from the PSVERP is for the reduction of emissions through landfill gas management and utilization.

Engineering estimates have a potential 60,000,000 Standard Cubic Feet (scf) of greenhouse gas capture in 2026 from additional landfill methane capture system installation. Capturing the additional landfill gas would result in an estimated capture of 575.618 Metric Tons of Methane, which would equal a total of 0.016 MMTCO_{2e} of methane in 2026. In the near term, by 2030, this additional capture would be an equivalent total of 0.064 MMTCO_{2e} of methane.

GHG Reduction Strategy 3: Home Weatherization and Energy Efficiency Improvements (PSVERP, pg. 32).

As a greenhouse gas emission reduction action, the Middle Georgia Regional Commission has selected residential structure weatherization as a priority activity. This activity aligns with those efforts of the State of Georgia in the Peach State Voluntary Emission Reduction Plan (PSVERP), under priority Strategy and Measure 2.1. The goal established for this program is the weatherization of 300 residential buildings.

Within the state's projected policy scenario, savings from Residential Weatherization in Georgia were estimated as 8% Annual Utility Bill savings in Climate Zone 3 (South), for a total house. As a priority reduction measure, the PSVERP estimated cumulative emission reductions (MMTCO_{2e}) in the near term of 2025 – 2030 at -2.508 MMTCO_{2e} per residential structure. The total cumulative emission reduction in the near term for the weatherization of 300 residential structures was determined by multiplying -2.508 MMTCO_{2e}. Based on the guidance of the policy scenario total cumulative emission reduction for the weatherization of all residential structures is -752.4 MMTCO_{2e}.

b. Magnitude of GHG Reductions from 2025 through 2050

GHG Reduction Strategy 1: Zero-Emission Buses (PSVERP, pg. 29).

As a priority reduction measure, the estimated cumulative emission reductions (MMTCO_{2e}) in the long term of 2025 – 2050 by the State of Georgia is -0.02 MMTCO_{2e} per bus. The total cumulative emission reduction in the long term for the replacement of 4 buses was determined by multiplying -0.02 MMTCO_{2e} by 4. Based on the guidance of the policy scenario total cumulative emission reduction for the replacement of four buses is -0.08 MMTCO_{2e}.

GHG Reduction Strategy 2: Landfill Gas Management and Utilization (PSVERP, pg. 37).

Engineering estimates have a potential 60,000,000 Standard Cubic Feet (scf) of greenhouse gas capture in 2026 from additional landfill methane capture system installation. Capturing the additional landfill gas would result in an estimated capture of 575.618 Metric Tons of Methane, which would equal a total of 0.016 MMTCO_{2e} of methane in 2026. In the long-term of 2025 - 2050, this additional capture would be an equivalent total of 0.387 MMTCO_{2e} of methane. The calculation was complete by multiplying 0.016 MMTCO_{2e} over 24 years.



GHG Reduction Strategy 3: Home Weatherization and Energy Efficiency Improvements (PSVERP, pg. 32).

As a priority reduction measure, the PSVERP estimated cumulative emission reductions (MMTCO_{2e}) in the long-term of 2025 – 2050 was estimated as -8.835 MMTCO_{2e} per residential structure. The total cumulative emission reduction in the near term for the weatherization of 300 residential structures was determined by multiplying -8.835 MMTCO_{2e}. Based on the guidance of the policy scenario total cumulative emission reduction for the weatherization of all residential structures is -2650.500 MMTCO_{2e}.

In total, the Middle Georgia Emissions Reduction Program results in 2025-2030 GHG reductions of 752.468 MMTCO_{2e}. Long-term reductions from 2025-2050 are estimated at 2,650.967 MMTCO_{2e}.

c. Cost Effectiveness of GHG Reductions

The Middle Georgia Emissions Reduction Program projects to reduce 752,468,000 metric tons of CO₂-equivalent emission reductions from 2025 through 2030. Dividing the proposed CPRG grant request of \$9,875,000 by this number leads to the cost effectiveness calculation below:

$$\text{\$9,875,000} / \text{752,468,000} = \text{\$0.013} // \text{1.3 cents per metric ton of CO}_2\text{-equivalent emission reductions}$$

The proposed number of emission reductions of this program are substantial and should produce a very strong return on investment. As discussed earlier when reviewing the risks associated with each program element and responsibility, MGRC is confident that most of the risk associated with the grant can be minimized due to the experience of all parties involved and the dedication of local partners to effectively implementing this program.

However, recognizing the uncertainty present in any major project, there are several factors that may influence this calculation one way or another. Most notably, for the purchase of zero-emission buses and implementation of landfill gas, the timeliness of emission reductions will be tied to the speed at which assembly or construction, respectively, occurs. Zero-emission buses are a complex technology, and MTA has experienced frustrations with suppliers being delayed in their bus assembly processes in the past. While it is certainly hoped that these challenges can be avoided, particularly as labor shortages have abated somewhat in the manufacturing sectors, this may still be a hazard. Furthermore, many public works construction projects in Middle Georgia have been delayed recently by supply chain issues, particularly when trying to source BABA-compliant products.

On the other hand, the already significant emission reductions from weatherization and energy efficiency improvements may be able to be accelerated or even increased, depending on the scope of work necessary at each home. While allowing \$20,000 for each home, this estimate tends to run toward the high end of expected weatherization costs. There is certainly potential that more than 300 homes could be served if costs run below this (admittedly conservative) estimate. If that were the case, MGRC would be able to accomplish even greater emission reductions than previously discussed in this section, leading to an even more advantageous cost-benefit analysis than the already low rate of 1.3 cents per metric ton of CO₂-equivalent emission reductions.

Throughout the lifespan of this project, MGRC will continue to evaluate performance and report on projected emission reductions to date as progress occurs.

d. Documentation of GHG Reduction Assumptions

See the attached technical appendix.



3. ENVIRONMENTAL RESULTS – OUTPUTS, OUTCOMES, AND PERFORMANCE MEASURES

a. Expected Outputs and Outcomes

As previously discussed, MGRC expects that the Middle Georgia Emissions Reduction Program results in 2025-2030 GHG reductions of 752.468 MMTCO_{2e}. Long-term reductions from 2025-2050 are estimated at 2,650.967 MMTCO_{2e}. Measuring the progress toward these goals will be a top priority of the regional commission staff and is a reason why administration funding is requested for this program. The technical appendix references additional documentation from the PSVERP, including information on additional GHG emissions and global warming potential (GWP).

A significant priority for the MGCAC will also be the reduction of CAP and HAP as part of this program. As discussed earlier, part of the region was previously in nonattainment of the 8-hour Ozone NAAQS. With the recent tightening of regulations surrounding PM2.5 NAAQS, several communities view themselves at potential risk for nonattainment for this measure as well. The 2020 National Emissions Inventory highlighted that a significant share of PM2.5 emissions in Middle Georgia came from larger industrial uses that were not covered by the State of Georgia's PCAP. However, Plant Scherer remains a prominent point-source emitter of both PM2.5 and NOx. By taking a system-wide view of the need for shifts in the electric grid, these types of improvements should be able to yield positive results for the region's air quality as a whole, especially with the region hosting such a large source of utility-scale power emissions.

b. Performance Measures and Plan

Under this funding opportunity, MGRC will continue to track emissions of GHG, NOx and PM2.5 as co-pollutants of special interest to the region, given its past challenges with NAAQS attainment. The expected output would be a reduction in each of these, consistent with the calculations discussed earlier in Section 2.A and 2.B, as well as seen in the technical appendix. While MGRC does not have a trained team of air quality experts or data modelers, the partnerships with the Georgia Environmental Protection Division (EPD) and EPA have been vital over the years. Given the role of Georgia EPD as the lead developer of the PSVERP, further consultation with EPD will be necessary to fully measure emission reductions as intended by the state's PCAP. Where the MGCAC can leverage its educational partners such as Fort Valley State University and Mercer University, it will continue to do so, as it has done in the past. MGRC may pursue structuring this through an EPA College/Underserved Community Partnership Program (CUPP) initiative.

c. Authorities, Implementation Timeline, and Milestones

As stated earlier, MGRC proposes sub-awards to two other local government entities within its service area. These partner entities include Houston County Board of Commissioners and the Macon-Bibb County Transit Authority (MTA). The MGRC purchasing policies allow non-competitive sub-award of funding to other governmental entities under an intergovernmental agreement, consistent with 2 CFR § 200.318(e) guidance. MGRC would contract out the management of weatherization and energy efficiency programs to one or more organizations serving the area through a Request for Proposals (RFP) process. Additional information on each entity's responsibilities can be seen below:

- Middle Georgia Regional Commission

MGRC is the proposed recipient of funding under this application. This will include the full proposed amount of \$9,875,000. MGRC has existing authority under both its enabling legislation and under Section 302(f) of the Clean Air Act to serve as a recipient of funding. The approved Work Plan for MGRC also includes several items related to sustainability and emission reductions. The most direct of these is, "Apply for grant funding for [Middle Georgia Clean Air Coalition] programs."



Responsibilities of MGRC will include overall administration of the entire project, including the development and implementation of policies for sub-recipients - and contractors to ensure compliance with all programmatic rules and regulations. MGRC staff will receive regular reports from all partnering entities and will conduct monitoring for compliance with the Davis Bacon Related Acts, Build America Buy America Act, and other regulations as necessary. In addition to preparing the sub-recipient agreements, MGRC will prepare a competitive Request for Proposals for the weatherization and home energy efficiency services proposed under this application. Respondents will be selected based on their plans for utilizing federal funding, experience in managing similar programs, and ability to conduct activities in a timely and professional manner.

MGRC then will not have direct responsibility for implementing the GHG reduction measures but will be the responsible entity for the conduct of the entire program. The MGRC implementation timeline is included below:

Activity	Timeline
Preparation & Execution of Subrecipient Award Agreements	Oct. 2024 – Dec. 2024
Preparation of RFPs for Weatherization/Home Energy Efficiency Services	Oct. 2024 – Dec. 2024
RFP Response and Evaluation Period	Jan. 2025 – Feb. 2025
Weatherization/Home Energy Efficiency Services Contract Award/Execution	Mar. 2025 – Apr. 2025
Post-Award Public Engagement (CEJST-Community Focused) Process	Oct. 2024 – Jun 2025
Ongoing Quarterly Reporting and Program Administration	Oct. 2024 – Sept. 2029

- Houston County Board of Commissioners

The Houston County Board of Commissioners is the entity responsible for the current ownership and maintenance of the Houston County Landfill, located in Kathleen, Georgia. As a general-purpose county government, Houston County may enter into contracts, apply for grants, act as a sub-recipient of federal dollars, and enact programs and investments consistent with the county's purposes and authorities. The Houston County Service Delivery Strategy identifies the landfill as a countywide service provided by Houston County. As such, Houston County has the legal authority to manage this landfill and has utilized this responsibility to pursue operational efficiencies, such as the capture of landfill gas in the past.

Houston County has the direct responsibility and authority to implement GHG reduction measures at the Houston County landfill. The implementation timeline is included below:

Activity	Timeline
Receive and Execute Subrecipient Award Agreement	Oct. 2024 – Dec. 2024
Procurement of Engineering Services for Landfill Gas Expansion	Jan. 2025 – Mar. 2025
Engineering Design Process for Landfill Gas	Apr. 2025 – Sept. 2025
Permitting, QA/QC, and Design Review Process	Oct. 2025 – Mar. 2026
NEPA Environmental Review Process	Jan. 2026 – Jun. 2026
Procurement of Contractor for System Installation	Jul. 2026 – Sept. 2026
System Installation/Construction	Oct. 2026 – Jun. 2027
Subaward Closeout	Jul. 2027 – Sept. 2027
Ongoing System Performance Monitoring	Sept. 2027 – Sept. 2029



- Macon-Bibb County Transit Authority

The MTA is a legally constituted authority under Georgia law, established by the “Macon-Bibb County Transit Authority Act of 1980,” approved March 26, 1980 (Ga. L. 1980, p. 4313). MTA has the authority to provide service anywhere in the State of Georgia, but currently operates 11 fixed routes throughout Macon-Bibb County, along with on-demand non-emergency paratransit services for patrons with disabilities. Furthermore, the Macon-Bibb County Service Delivery Strategy delegates countywide provision of transit services to the MTA. As a public authority in the State of Georgia, MTA enter into contracts, act as a sub-recipient of federal dollars, apply for grants, and enact programs and investments consistent with the authority’s purposes.

MTA has the direct responsibility and authority to implement GHG reduction measures on the authority’s rolling stock. The implementation timeline is included below:

Activity	Timeline
Receive and Execute Subrecipient Award Agreement	Oct. 2024 – Dec. 2024
Develop Bid Specifications for Electric Buses	Jan. 2025 – Mar. 2025
Procurement Process for Buses	Apr. 2025 – Jun. 2025
Contractor Builds, Assembles, and Delivers Buses	Jul. 2025 – Jun. 2026
Subaward Closeout	Jul. 2026 – Sept. 2026
Ongoing System Performance Monitoring	Sept. 2026 – Sept. 2029

- Additional Weatherization/Home Energy Efficiency Contractors

In addition to the sub-recipients identified above, MGRC will contract with at least one provider of home weatherization and energy efficiency services within the region. These contracts will require participation in the public outreach process once awarded and any successful respondents will be required to submit a detailed implementation schedule as part of their response to the request for proposals.

4. LOW-INCOME AND DISADVANTAGED COMMUNITIES

a. Community Benefits

If entire regions could qualify as low-income communities, Middle Georgia is among those communities that would most accurately bear that title. Utilizing data from StatsAmerica (a collaboration of the U.S. Economic Development Administration and Indiana Business Research Center), the Middle Georgia region has a per capita personal income of only 71% of the national average, even though rates of unemployment are better regionally than nationally. StatsAmerica also develops an “Innovation Intelligence Index.” In terms of economic well-being, Middle Georgia ranks in the 10th percentile nationally among all other Economic Development Districts. In terms of compensation, the region ranks in only the 5th percentile nationally. As such, any investment, anywhere in Middle Georgia, can be an important contribution to supporting low-income and disadvantaged communities.

More specifically, however, the expected benefits of this program will specifically benefit low-income and disadvantaged communities. The landfill gas project in Houston County is least likely to have a direct benefit on low-income and disadvantaged communities. The site is in a very rural area, so the direct capture of landfill gas escaping the site is relatively minimal for the surrounding human environment. The greatest opportunity for benefit is the creation of high-quality jobs as part of installing natural gas



equipment and infrastructure on site. The project will also reduce the potential for noxious odors and can help aid the overall efficiency of solid waste disposal. While this is not a direct benefit to low-income communities, it is still certainly a public good—especially considering that a long history of land use planning decisions would have located these types of nuisances closer to disadvantaged neighborhoods.

In Macon-Bibb County, however, most bus routes will pass through multiple underserved (CEJST) census tracts, with some only servicing those tracts on their fixed routes. As such, it can be assumed that 100 percent of the expected benefits from reduced emissions via the electric bus strategy will be seen in impacted disadvantaged communities. These benefits are some of the most wide-ranging, as electric buses are far superior to diesel buses. On a community-wide basis, Macon-Bibb County will realize improved public health resulting from reductions in co-pollutants from each transit bus. These examples would likely include reductions in new asthma cases and reductions in hospital admissions and emergency department visits. In addition, electric buses lead to significantly reduced noise pollution in the neighborhoods they serve. Every route includes a significant portion of CEJST areas that will benefit.

Furthermore, the weatherization and energy efficiency program will be geared exclusively toward low-income and disadvantaged residents, no matter where they live or work. The Middle Georgia Regional Commission has a service area of 11 counties. However, the state of Georgia's defined areas for weatherization activities includes two different regions that comprise all 11 MGRC counties, but also include an additional 17 counties within a broader central Georgia area. For ease of administering this program, two different contracts may be made for the two different areas identified by the State of Georgia for weatherization and energy efficiency services. In the interest of consistent bookkeeping and accounting, these programmatic benefits will extend beyond the MGRC region and into any of the 28 counties within an area of Middle Georgia for weatherization services.

Again, in terms of benefits, 100 percent of the expected benefits from reduced emissions from home modifications (including also 100 percent of the energy bill savings and improvements in housing quality, comfort, and safety) will be directed toward low-income communities and households.

Across the entire project of \$9.875 million, 85 percent of project expenditures and programmatic benefits will be targeted directly toward low-income individuals or communities across the region. This is a clear win for some of the region's most disadvantaged areas. Low-income and disadvantaged residents in Macon-Bibb County will reap the direct benefits of cleaner air around the MTA Buses. Low-income residents will experience energy efficiency improvements that save them money on their daily needs. And as the region's electric grid becomes cleaner and more efficient, so too will benefits come to disadvantaged coal communities like Juliette, adjacent to Plant Scherer in Monroe County.

Among the targeted CEJST Census Tracts, the following table highlights those sites that will benefit most directly from the home weatherization/energy efficiency and electric bus projects.

Baldwin County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9702.00	9704.00	9705.00	9706.00
9707.01	9707.02	9708.00	
Bibb County (Macon-Bibb County) CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits plus Electric Transit Bus Benefits)			
0101.00	0103.00	0104.00	0105.00
0110.00	0111.00	0115.00	0117.01
0117.02	0122.00	0123.00	0124.00
0125.00	0126.00	0127.00	0128.00



Middle Georgia Emissions Reduction Program

0129.00	0131.01	0131.02	0132.01
0132.02	0133.02	0134.07	0135.02
0135.03	0137.00	0138.00	0139.00
Bleckley County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
7901.00	7902.00		
Butts County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
1502.00	1503.00		
Crawford County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
0701.00	0702.01	0702.02	
Dodge County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9601.00	9604.00	9606.00	
Hancock County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
13141480300	13141480400		
Houston County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
13153020300	13153020400	13153020700	13153021300
Jasper County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
0101.00	0102.00	0105.00	
Johnson County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9601.00	9602.00	9603.00	
Jones County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
0301.04	0302.00		
Lamar County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9703.00			
Laurens County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9501.00	9503.00	9504.00	9505.00
9507.00	9508.00	9509.00	9510.00
Monroe County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
0501.01	0501.02		
Peach County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
0402.00	0403.01	0403.02	0404.00
Pulaski County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9501.00	9503.00		
Putnam County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9601.01	9602.01	9602.02	
Spalding County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
1601.00	1603.00	1604.00	1608.00
1609.00			
Telfair County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9501.00	9502.00	9505.00	
Treutlen County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9601.00	9602.00		
Twiggs County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
0601.00	0602.00		
Upton County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
0101.00	0102.01	0104.00	0105.00
0106.00			
Washington County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9503.00	9504.00	9507.00	
Wheeler County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
7801.00	7802.00		



Wilcox County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9601.00	9602.00	9603.00	9604.00
Wilkinson County CEJST Census Tracts (Home Weatherization and Energy Efficiency Benefits)			
9603.00	9604.00		

Data Source: <https://screeningtool.geoplatform.gov/en/#8.59/32.8374/-83.8066>

If awarded funding under this program, MGRC will utilize its administrative capacity funded under this grant to more thoroughly document emission reductions and analyze community benefits. As an EPA Advance Program partner, Middle Georgia Regional Commission has worked closely with state and federal air quality modelers in previous years. MGRC staff have directly utilized the AVERT and COBRA models. Utilizing local educational partners at Fort Valley State University and Mercer University, students have also run the EPA GLIMPSE model to provide information on various emission reduction scenarios. As such, MGRC is confident that staff will be able to document successes and publicize the positive impacts on low-income and historically disadvantaged communities.

b. Community Engagement

When the emission reduction strategies in the Peach State Voluntary Emission Reduction Plan were first released to plan stakeholders, the Middle Georgia project team quickly started to identify programs that would be of greatest help to our region's low-income and disadvantaged communities. This list was not publicized until late February 2024, so unfortunately, MGRC did not have an opportunity to conduct broad-based community outreach before the application deadline. However, a diverse group of leaders pulled together their resources to best determine meaningful solutions.

The Middle Georgia Clean Air Coalition membership was responsible for reviewing potential project ideas and refining them to reflect the region's own air quality priorities as well as the state's PCAP. This group includes elected officials from 17 local jurisdictions, a variety of local staff members, and private residents with a vested interest in sustainability. As these regional leaders met, they quickly determined that assisting residents with their energy bills would be an important element of the project, even without undertaking targeted outreach to the low-income communities of Middle Georgia. Beyond this initial outreach, MGRC staff reached out to non-profit partners who work directly with many low-income residents on existing programs, such as the Department of Energy's weatherization program. These meetings highlighted that hundreds of residents throughout Middle Georgia were stuck on waiting lists for service. Furthermore, for those who did get to participate, DOE regulations would sometimes prevent the most impactful improvements to energy efficiency—such as changing out old gas appliances for newer, electric ones. With this input from those with the most direct knowledge of weatherization programs for low-income individuals, MGRC was able to craft a program that would provide greater flexibility while directly helping hundreds of low-income residents. Simultaneously, this infusion of additional cash will help to reduce the lengthy waiting lists for service.

If selected for funding, MGRC will hold several listening sessions throughout the region to ensure that low-income residents have their voices heard in the process of implementing the project. MGRC is also actively exploring ways to leverage partnerships with Georgia Power and the local Electric Membership Cooperatives to host forums that discuss the benefits of weatherization and energy-efficient products. Although this effort will not be funded by funding from the Climate Pollution Reduction Grant program, it nonetheless allows this grant funding to go further while demonstrating the value of the program to local low-income and disadvantaged residents. This communication will be scheduled to occur regularly to ensure maximum transparency and accessibility.



5. JOB QUALITY

a. Job Quality

This project is particularly likely to sustain and create quality jobs within Middle Georgia due to its scope. Only the electric bus element of the project is expected to be manufactured and delivered solely by laborers in other economic market areas. Within the landfill gas and weatherization elements of the project, local contractors will be involved in the installation of the gas capture systems and the residential improvements to support energy efficiency. All of these workers will be required to be compensated at the local prevailing wages under the Davis-Bacon Related Acts based on the location of the project. Jobs in the green energy sector were also explicitly mentioned as part of the 2022 Middle Georgia Comprehensive Economic Development Strategy (CEDS). In a region with unemployment rates that bests the national average, but below-average wages and income, the types of good jobs in the construction and green energy sectors can be key to lifting individuals out of poverty.

To further these goals, MGRC will enact contract language that not only meets the Davis-Bacon requirements but also allows a sub-awardee or contractor to give preference to subcontractors with strong labor standards. Further, MGRC will voluntarily require construction contractors to post job openings in locations likely to be seen by individuals in disadvantaged communities, similar to the Section 3 requirements of the HUD Community Development Block Grant program.

6. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Past Performance

The Middle Georgia Regional Commission is very highly skilled in the management of federal funding. The organization's annual budget regularly exceeds \$10 million, with exact amounts depending on the level of financial assistance received or available. The majority of this funding comes from the federal government by way of contracts for services, such as those operated through the Area Agency on Aging, which allows older adults to remain in their homes and communities as they age. In addition to these contracts, MGRC staff regularly assists the constituent communities of Middle Georgia with grant writing and administration services. The largest of these community projects currently being administered by MGRC is a sewer system development project for the City of McIntyre, which uses a combined \$19.7 million in federal and state grants and loans from three different funding agencies. This highlights the ability of MGRC to handle complex projects such as this one.

Concerning grants and cooperative partnerships directly between MGRC and the federal government in the last three years, five current programs exist. One of these is currently in its first year of implementation, and will have less relevant data available.

1. Middle Georgia Economic Development District Partnership Planning (2020-2022)

- **Assistance Agreement Number:** ED20ATL3020019
- **Agency & Assistance Listing Number:** U.S. Economic Development Administration: 11.302
- **Brief Description:** MGRC regularly receives funding under a cooperative agreement to undertake economic development planning and technical support assistance for communities in the region. This three-year period included a successful update to the region's Comprehensive Economic Development Strategy (CEDS), and the planning grant was renewed in early 2023.
- **Contact:** Priscilla Kittles, Administrative Director, Economic Development Administration Atlanta Regional Office | PKittles@eda.gov | (404) 730-3004



2. Middle Georgia EDD CARES Act Supplemental Planning

- **Assistance Agreement Number:** ED20ATL3070097
- **Agency & Assistance Listing Number:** U.S. Economic Development Administration: 11.307
- **Brief Description:** CARES Act Funds were used to develop a COVID-19 recovery and resilience strategy for the Middle Georgia Region. This one-time infusion of additional funds allowed MGRC to develop this supplemental plan with all project elements completed on time and without issue.
- **Contact:** Priscilla Kittles, Administrative Director, Economic Development Administration Atlanta Regional Office | PKittles@eda.gov | (404) 730-3004

3. Middle Georgia-Robins Air Force Base Sustainability Plan

- **Assistance Agreement Number:** HQ00052010046
- **Agency & Assistance Listing Number:** Office of Local Defense Community Cooperation: 12.610
- **Brief Description:** MGRC received funding to work with a private contractor on the development of a plan that would address land use and sustainability of operations in the community around Robins Air Force Base. The plan was completed successfully, and even though the contractor needed to request a no-cost time extension, the project was completed without any findings or financial issues.
- **Contact:** Jay Sweat, Project Manager, Department of Defense, Office of Local Defense Community Cooperation | jason.e.sweat2.civ@mail.mil | (703) 697-2156

4. Middle Georgia EDA CARES Act Revolving Loan Fund

- **Assistance Agreement Number:** 04-79-07510
- **Agency & Assistance Listing Number:** U.S. Economic Development Administration: 11.307
- **Brief Description:** CARES Act Funds were used to capitalize a revolving loan fund to support the growth and expansion of businesses; in total, four loans were originated that created 40 jobs in a variety of industries. The project was completed on time and without any issues or findings.
- **Contact:** Karen Lynch, RLF Manager, Economic Development Administration Atlanta Regional Office | KLynch@eda.gov | (404) 987-9626

5. Middle Georgia Local Development District 2023 Capacity Building

- **Assistance Agreement Number:** LDD23GA010
- **Agency & Assistance Listing Number:** Southeast Crescent Regional Commission: 90.705
- **Brief Description:** This is a new program initiated in 2023 and is still in progress. As a local development district within the Southeast Crescent Regional Commission (SCRC), MGRC receives funding to assist communities in taking advantage of SCRC programs.
- **Contact:** Joshlynn Edmond, Grant Program Manager, Southeast Crescent Regional Commission | jedmond@scrc.gov | (803) 851-3356

Each of these projects above was completed on time and on budget (or is on track for timely completion). No findings have been tied to these grants or cooperative awards to date, and MGRC is considered a low-risk grantee.

As can be demonstrated, MGRC has a solid track record of managing its own grants and cooperative partnerships with the federal government. Further, while MGRC rarely applies for grants of this size directly, the grants management principles employed throughout the region will allow MGRC to effectively manage and implement this program.



b. Reporting Requirements

The Middle Georgia Regional Commission has a strong track record of submitting federal reports and reimbursement requests in a timely manner. As described above, the majority of federal grants and cooperative agreements for MGRC are with the U.S. Economic Development Administration (EDA). Grantors with questions about past performance are encouraged to contact the organizational contacts listed above. However, the strength of MGRC's relationship with EDA, its cognizant federal agency, as demonstrated by the ongoing 45-year partnership, highlights the organization's dependability in matters of federal interest. Furthermore, when additional time has been required, MGRC has communicated clearly and concisely with granting agencies, such as the extension request approved by the Office of Local Defense Community Cooperation (OLDCC), when MGRC's contractor needed additional time to complete a plan for the region. MGRC certifies that throughout the life of this project, it will continue to meet the reporting requirements set forth by EPA and other federal granting agencies. Furthermore, MGRC will submit acceptable technical reports under those agreements and will report on reasons for insufficient progress if they occur.

c. Staff Expertise

The Middle Georgia Regional Commission, first known as the Middle Georgia Area Planning and Development Commission from 1965 to 1989 and later the Regional Development Center until 2009, was established under the Georgia Planning and Zoning Enabling Act of 1957 to serve as a regional forum for the implementation of planning and development initiatives. The Georgia Planning Act of 1989 addressed growth strategies for Georgia communities and further defined the role of the Regional Commission as the regional planning and development instrument of Middle Georgia. MGRC also serves as the official Area Agency on Aging under the Older Americans Act of 1973 and is officially designated as the Economic Development District of Middle Georgia by the US Department of Commerce. The staff of 39 employees provides services in the areas of aging resources, economic development, planning, public administration, technology services, and transportation. MGRC also serves as the staff and fiscal agent for several other regional organizations comprised of the same municipal and county members such as the Middle Georgia Clean Air Coalition (MGCAC).

Four total staff members from will be involved with support for this program. As the recipient of grant funding, the MGRC Executive Director, Laura Mathis, serves as the authorized official for the project as well as the principal in charge. Ms. Mathis joined MGRC in May of 2007 and was appointed to serve as Executive Director in July 2016. Ms. Mathis oversees the day-to-day management of the entire organization and continues to provide technical assistance to cities and counties in the 11-county region. Previously, she served as the County Manager for Wilkinson County from December 1999 to May 2007. Ms. Mathis received her Master of Public Administration from the University of Georgia in 1994 and a Bachelor of Arts in Political Science and French from Converse College in 1992.

The project director, who will serve as the primary point of contact and will manage the implementation of this program is the MGRC Director of Planning and Public Administration, Greg Boike. In this role, he also serves as the project director for the Middle Georgia Clean Air Coalition. Mr. Boike joined the Middle Georgia Regional Commission in May 2014 and was appointed to his current role in August 2016. Before joining the Middle Georgia Regional Commission, he held internships with the Georgia Municipal Association, Gwinnett County Government, and the Washington, DC office of Congressman John Lewis. Mr. Boike received his Master of Public Administration in 2014 and his Bachelor of Arts in Political Science and Geography in 2012, all from the University of Georgia. Greg holds active membership in the American Institute of Certified Planners (AICP) and holds a Certified Public Manager (CPM) distinction.



Assisting as a specialist on the project will be Alex Smith, Environmental and Land Use Planner for MGRC. He joined the MGRC staff in 2023 after four years working for another regional commission within the state. In his role, Mr. Smith assists with a variety of planning and community development needs, including support for the Middle Georgia Clean Air Coalition. He received his Master of Environmental Planning and Design from the University of Georgia in 2018 and his Bachelor of Science in Forest Resources from the University of Georgia in 2006.

Finally, assisting with project implementation will be Senior Advisor to the Middle Georgia Clean Air Coalition, Ray Clark. Ray Clark is the CEO of RiverCrossing Strategies, a consulting firm working with clients to develop environmental policies and strategies that achieve the objectives of economic development and environmental conservation. He was formerly the Assistant Secretary of the Army (acting) and the Principal Deputy Assistant Secretary of the Army (Installations and Environment) He was responsible for military construction, family housing, all real estate transactions, energy, and the environmental and natural resource management program. Mr. Clark was also responsible for base closure and transitioning excess military property to economic development.

Prior to his appointment to this position, Mr. Clark was Associate Director at the White House Council of Environmental Quality where he acted as advisor to the President, the Chairman of CEQ and Senior White House Staff. Ray is a past recipient of the prestigious National Environmental Quality Award. He is the editor of two books on environmental policy. He holds a Master of Environmental Management degree from Duke University, where he was adjunct faculty for over 25 years.

7. BUDGET (SPREADSHEET AND ADDITIONAL NARRATIVE INCLUDED AS AN APPENDIX)

a. Budget Detail

See detailed Budget Spreadsheet and Budget Narrative.

b. Expenditure of Awarded Funds

MGRC has experience in administering similar grant programs in which a significant amount of project work is sub-awarded or contracted to other entities. MGRC sets detailed quarterly reporting requirements for all sub-recipients and subcontractors to clearly identify and justify expenditures and to document progress toward implementing programmatic goals.

As a condition of EDA funding received under the Coronavirus Aid, Relief, and Economic Security (CARES) Act, key MGRC staff were required to complete Waste, Fraud, and Abuse Training. These staff members received a Certificate of Completion that can be provided upon request. MGRC also implements a fraud prevention statement in all intergovernmental agreements and contracts. Staff involved with the programmatic and financial management of this program will continue to abide by the highest standards, as evidenced by MGRC's recognition as an Organization of Ethics but the Georgia Municipal Association.

With this commitment to professional management and the highest levels of integrity, MGRC will be able to ensure the successful implementation of this program of work. Staff will regularly monitor progress to ensure that funds are being drawn down and expended in a timely manner. MGRC staff also retains experience in grant administration activities to ensure external compliance by subcontractors and sub-awardees. This includes direct knowledge of federal procurement rules and regulations, the grants management guidance of 2 CFR 200, and compliance with supplemental regulations such as the Davis Bacon Related Acts and the Build America Buy America Act.



c. Reasonableness of Costs

In comparing Middle Georgia's proposed scope of work to similar applications, all costs should be verified as reasonable. With a relatively modest request of \$9.875 million, Middle Georgia is intent on making a maximum impact on greenhouse gas emissions and quality of life for disadvantaged communities at a reasonable cost. This impact is substantiated by the cost-effectiveness analysis discussed previously.

Regarding the programmatic line items, MGRC based all cost estimates off current market rate prices and/or estimates from qualified professionals. The weatherization budgets were set based on spending up to \$20,000 per household, based on actual costs that had been documented in recent years. The electric bus cost estimates were also based upon recent quotes. The landfill gas expansion was based on the estimate of a consulting engineer.

MGRC is also requesting a modest administrative fee of approximately 3 percent. This was chosen to reflect the EPA administrative fee that was retained from the original Congressional obligation. It also matches a five-year administration commitment at MGRC's typical cost structure of \$60,000 for grants of approximately \$1 million to \$2 million. These personnel, fringe, and indirect costs will not only support the implementation of the program but also compliance with all necessary federal requirements. Indirect costs are based on the negotiated rate between MGRC and its cognizant federal agency, EDA.

In summary, all costs reflect the minimum amount necessary to complete the scope of work, and the project scope is designed for maximum impact—particularly for disadvantaged communities.

