

# TULSA METROPOLITAN AREA CLIMATE POLLUTION REDUCTION GRANT IMPLEMENTATION WORKPLAN



Prepared by Indian Nations  
Council of Governments  
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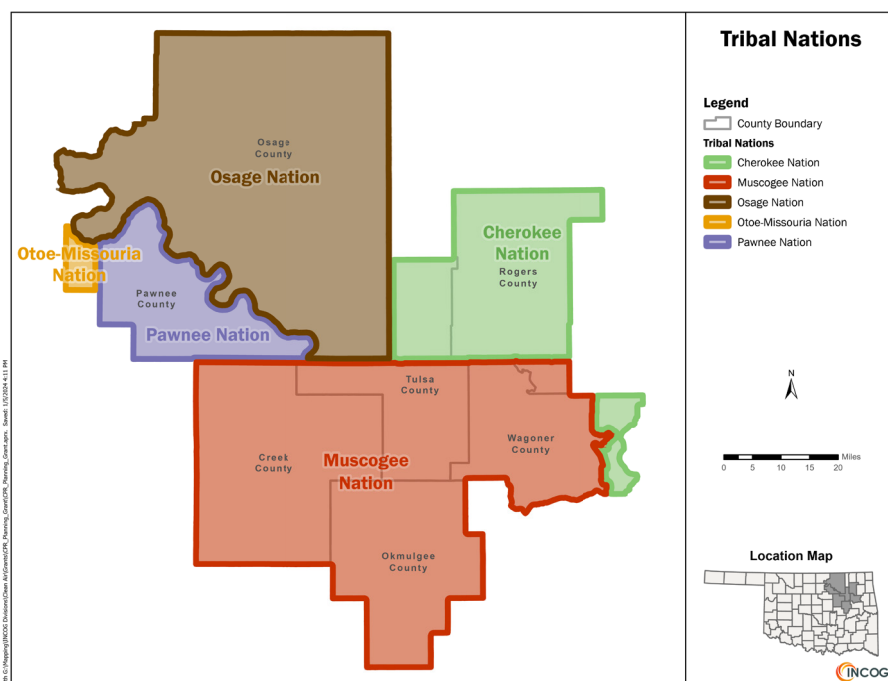
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# INTRODUCTION

As the world responds to the impending consequences of climate change, whether through mitigation measures or outright avoidance, the decisions made over the next several years will have long-lasting effects on the future quality of life in the Tulsa metropolitan area. Tulsa, formerly known as the “Oil Capital of the World”, has not responded seriously to the warning signs, and contributions locally have largely fallen to individual behavior changes and non-profit efforts to educate and encourage residents and businesses to reduce their carbon footprint. Government has lagged more than most sectors in the region, with very little intentionality related to addressing climate change. Much of this resistance is borne from fear that negative impacts to the oil and gas industry will harm Oklahomans. As a major extractor, transporter, and refiner of petroleum and petroleum products, Oklahoma stands to feel the changes needed to address climate change more greatly than most American states. Given this reality, it is critical that the transition to a more resilient and sustainable future is phased in to replace existing economic structures and support the ongoing prosperity of Oklahomans.

The Tulsa Metropolitan Statistical Area (MSA) is the second largest MSA in Oklahoma after Oklahoma City, but Tulsa is also the largest city in any Indian tribal boundary in the United States. The entire MSA is within the tribal boundaries of five Tribal Nations. This overlapping jurisdiction has recently become contentious with the Supreme Court ruling in the *McGirt vs. Oklahoma* case related to the question of disestablishment of the Indian reservations; however, this overlap presents unique opportunities to collaborate.



The Council on Environmental Quality (CEQ), at the direction of President Biden in Executive Order 14008, developed the Climate and Economic Justice Screening Tool, and given the Tulsa MSA's location that overlaps with the reservations of the Osage Nation, Cherokee Nation, Muscogee Nation, Pawnee Nation, and the Otoe-Missouria Nation, the entire MSA is identified as “disadvantaged”. While this tool highlights the significance of the Tulsa MSA in the Justice40 initiative, the composition of the region is varied, and the effects of climate change are felt differently across vulnerable population groups.

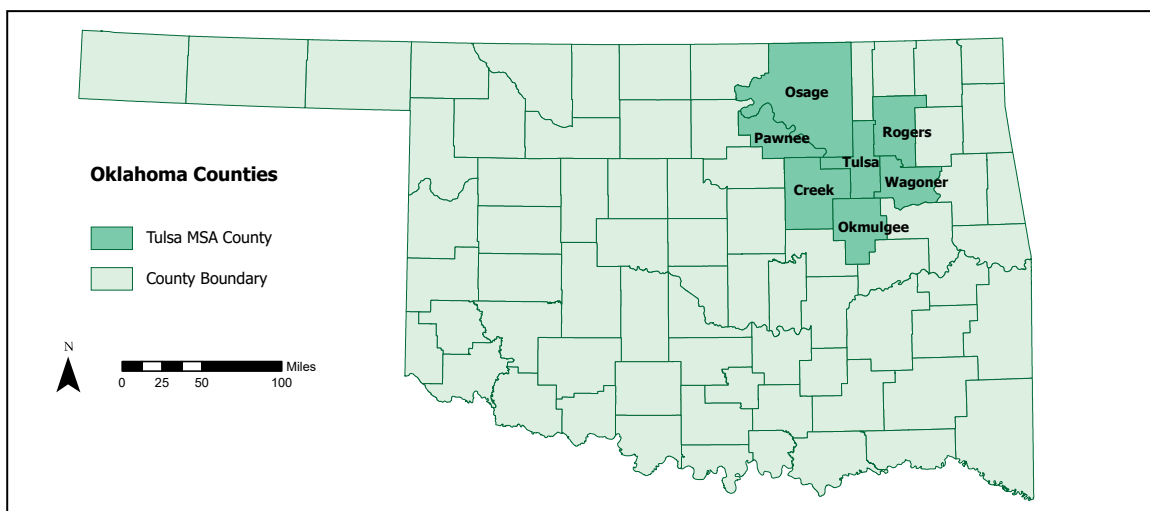
Oklahoma and Tulsa have historically made decisions regarding infrastructure that have divided minority communities, such as the Greenwood commercial district and neighborhood in Tulsa, which was bisected by Interstate 244 and hollowed out by Urban Renewal policies. These communities suffered as these projects were implemented, but the impacts are still felt today due to the proximity of polluting highways to residential, educational, and recreational land uses in these areas. According to the EPA's EJ Screen tool, many areas in close proximity to the highways in the Tulsa region are above the 80th percentile, with significant areas above the 95th percentile, of particulate matter, ozone, and diesel particulate matter. Air pollutant exposure is particularly significant in areas of the region that have lower levels of tree canopy coverage and higher risks of extreme heat and other weather events. Extraction and refinement of oil and natural gas have also had a lasting impact on vulnerable population groups in the region with several Brownfield and Superfund sites associated with soil contamination occupying sites within areas that are historically Black and Indigenous.

Vulnerable populations in the region are not limited to the urban areas, and much of the impact of climate change will be felt by residents in rural areas, especially in lesser-developed areas of the tribal reservations. Extreme heat and storms are projected to increase, and areas of the region with less access to emergency services, as well as those who rely on the production value of the land, will be vulnerable to these climatic changes and weather events. While the region is accustomed to severe weather as a reality of living in Tornado Alley, an increase in these events presents a threat to property, livelihood, and life. Most rural areas have seen population declines in recent decades, and additional pressures from the environment could exacerbate this population loss and increase barriers to moving for those that are most disadvantaged. In the Tulsa MSA, Osage County has the greatest amount of rural area, and the County boundaries align with the reservation boundaries of the Osage Nation. Osage County is the largest county in Oklahoma and is larger than the state of Rhode Island. The county is very rural, with a population density of 20 people per square mile. As highlighted in the book and movie, *Killers of the Flower Moon*, The Osage Nation has historically benefited from the extraction of oil on their reservation, but suffered oppressive oversight policies by federal, state, and local government. The cruelty of these policies sought to restrict the independence of the Osage Nation, but the spirit of independence persists today and is a common trait of residents of the rural reaches of the Tulsa MSA, regardless of tribal affiliation. Ensuring independence for the future is a critical component of any plan to alter the means of prosperity in the region.

The Tulsa region has been a leader in energy innovations for over a century, and as the world transitions to renewable and lower-carbon forms of energy, the region is poised to leverage its abundant natural resources and energy sector expertise to continue prospering as an energy leader in the next century. Tulsa's unique geography provides very high potential for solar and wind energy, with Oklahoma producing more wind energy than any state besides Texas and ample opportunity for expanding wind resources, in addition to having the sixth highest solar potential of any state. Oklahoma's major state universities also play a critical role in geothermal energy technology development, bolstered by the applicability of the state's extensive oil and gas industry talent.

Tulsa is unique in the amount of significant contributions from the philanthropic sector. Investments such as the award-winning park, Gathering Place, and the geothermally powered Guthrie Green are excellent examples of how Tulsa's philanthropic community values a greater degree of environmental sustainability. The State of Oklahoma, The City of Tulsa, and other government organizations have demonstrated an openness to innovation in the energy and transportation sectors, incentivizing and attracting numerous businesses whose products include solar cells, electric vehicles, lithium, and wind energy. This confluence of investment in clean energy innovation demonstrates the region's unique assets that may be leveraged in implementing the Climate Pollution Reduction Grant program.

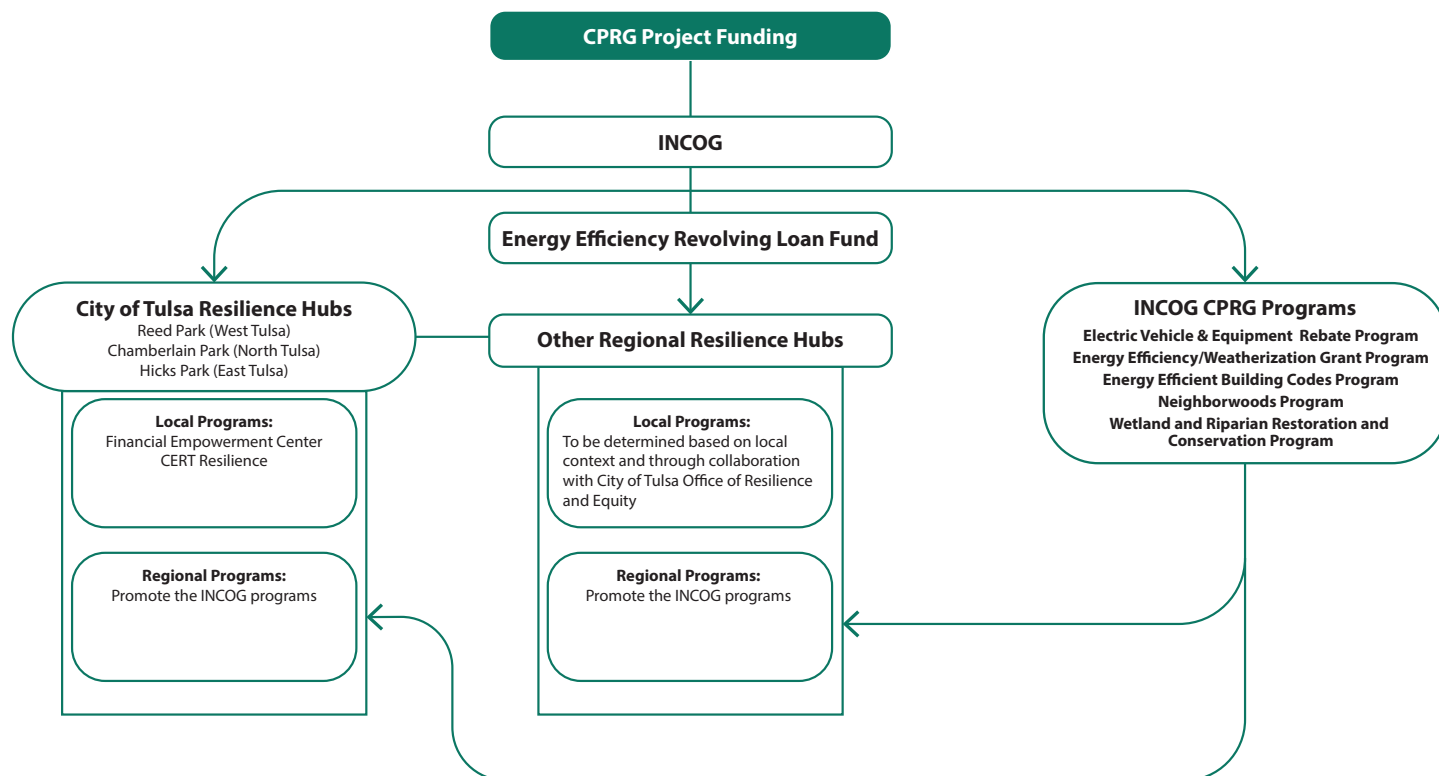
The Tulsa region should serve as a key representation of the EPA's ambitions and commitments, and funding for intervention will go further in this region than most across the country.



## 1. Overall Project Summary and Approach

The Indian Nation Council of Government's (INCOG) approach to developing an implementation proposal was informed by the Tulsa MSA Priority Climate Action Plan (PCAP). The greenhouse gas (GHG) reduction strategies included in the PCAP were determined to be priorities for several reasons: they are measures capable of being implemented by eligible entities as defined in the Climate Pollution Reduction Grant Program: Implementation Grants General Competition Notice of Funding Opportunity Section III.A.(Table 2), provided the best opportunity for significant GHG emissions reductions, and focused benefits on Low-Income and Disadvantaged Communities. The goals and outputs of this project support EPA's Fiscal Year (FY) 2022-2026 Strategic Plan, Goal 1, "Tackle the Climate Crisis"; Objective 1.1, "Reduce Emissions that Cause Climate Change."

This proposal is tailored to address inequities in Tulsa by using the model of the Resilience Hub as a way to direct the benefits of the CPRG program to LIDAC areas. This proposal will fund the retrofit of three community centers in Tulsa to serve as Resilience Hubs, providing safe haven for residents during climate-related extreme weather events, educating residents on ways to reduce climate pollution, and connecting residents with the other programmatic components of the proposal. This includes the Electric Vehicle and Equipment Incentives program, which will encourage residents to switch their automobiles and lawn care equipment to electric. By providing a rebate for these purchases, this program will make electrification more attainable for low-income households, and over time these changes will help reduce the exposure these residents have to particulate matter, ozone, and other pollutants from gas-powered vehicles and equipment. Residents will also have access to the Neighborhoods program and the Wetland Restoration and Riparian Conservation Program, which are designed to increase tree canopy and vegetation coverage in areas of the region that suffer most from the Urban Heat-Island Effect. To enhance these efforts, residents will also have access to the Energy Efficiency and Weatherization program, which will fund renovations to residential and commercial buildings that reduce energy cost burden and exposure to extreme heat and cold. To ensure that this practice of energy efficiency extends beyond the renovation program, this proposal includes a program to work with local governments to update building codes to more energy efficient modern codes. Finally, the City of Tulsa Resilience Hubs will serve as a model for other communities in the Tulsa MSA to pursue the establishment of their own Resilience Hubs, and that will be facilitated by the existing Energy Efficiency Revolving Loan Fund program, which will be expanded by this funding, allowing for greater utilization of the available dollars to transition these facilities.



## 1.a Description of GHG Reduction Measures



# RESILIENCE HUBS

**Funding Request: \$9,965,752**

### Description

This project would lead to the development of sites in LIDAC neighborhoods that can serve as hubs for resilience against extreme weather, other natural disasters, and emergencies. These facilities will be designed to continue operations through these events, and to provide needed resources to community members less able to withstand such events. These hubs are places to educate and train community members to take action at the neighborhood scale to reduce greenhouse gas emissions.

### Features, Tasks, Milestones, and Risks

1. Renovation of existing community centers at City of Tulsa's parks, Chamberlain Park, Hicks Park, and Reed Park, including, but not limited to, solar panels, battery storage equipment, energy efficient equipment (HVAC, lighting, and water heaters), insulations, and windows.
2. Program implementation
  - Electric Vehicles and Equipment Incentive Program
  - Weatherization and Energy Efficiency Program
  - Neighborwoods Program
3. Program outreach and support
  - Energy Efficient Building Codes Program
  - Wetland Restoration and Riparian Conservation Program

### Roles and Responsibilities

The Resilience Hubs will be managed by the City of Tulsa with one Resilience Hub Manager and three Resilience Hub Coordinators funded through the CPRG program. The City of Tulsa will issue a Request for Proposals to hire construction contractors to perform the energy efficiency and renewable energy renovations on existing community centers. The City of Tulsa CPRG-funded positions will coordinate with the INCOG CPRG Program Manager and Program Coordinator to implement, enroll participants, provide technical assistance and promote the Electric Vehicles and Equipment Incentive Program, the Weatherization and Energy Efficiency Program, and the Neighborwoods Program. Additionally, the City of Tulsa Resilience Hub coordinators will provide outreach and education support for the Energy Efficient Building Codes Program and Wetland Restoration and Riparian Conservation Programs.

#### Coalition Lead: City of Tulsa Office of Resilience and Equity

- Resilience Hub Manager
- Resilience Hub Coordinators (x3)

#### Coalition Support: INCOG

- CPRG Program Manager
- CPRG Program Coordinator

**GHG Reductions 2025-2030:** 6,620 mtCO<sub>2</sub>e

**GHG Reductions 2025-2050:** 33,020 mtCO<sub>2</sub>e



# ELECTRIC VEHICLES & EQUIPMENT

**Funding Request: \$1,000,000**

## Description

This project would provide incentives for the purchase of light-duty EVs and PHEVs, pedal-assist electric bicycles, and electric lawn and garden equipment in the Tulsa MSA. By making low-emission vehicles and equipment more affordable and accessible to LIDAC residents and businesses, this project would provide direct financial and health benefits to recipients while reducing the number of internal combustion engine vehicle miles traveled (VMT) on Tulsa MSA roads. This program will include an option for applicants to scrap a comparable gasoline or diesel vehicle or piece of equipment for a higher incentive.

## Features, Tasks, Milestones, and Risks

1. Design an incentive program for all types of electric vehicles, ensuring that at least 40% of the available incentive funding is provided to LIDAC recipients.
  - a. The incentives will be available to residents and businesses in Tulsa MSA counties.
  - b. For each program year, incentive amounts available will be determined based on:
    - i. available (remaining) program funding,
    - ii. income or DBE qualifications,
    - iii. the cost of eligible vehicles or equipment,
    - iv. scrappage of comparable combustion engine vehicles or equipment.
2. Build necessary partnerships for program success, including:
  - a. Point-of-sale partners (local dealerships and hardware stores) for applicants using vouchers
  - b. Scrap yard partners
  - c. Marketing and promotion partners
3. Create easy means for the community to access the incentive program.
  - a. Host a web-based application portal for applicants to apply for incentives.
  - b. Provide a voucher option for applicants to utilize at the point of sale.
  - c. Create a rebate option.
  - d. Provide information and forms in both English and Spanish.
4. Provide relevant information and education to incentive recipients and dealership partners.
  - a. INCOG's Tulsa Area Clean Cities program will create resources for recipients of EVs, PHEVs, and electric yard equipment to encourage proper use and maintenance and longer useful lives.
  - b. Tulsa Area Clean Cities will also work with point-of-sale dealership partners to ensure their staff is competent in EVs and PHEVs to provide a positive buying experience for incentive recipients.

The main risk presented by this project is the possibility of not expending all the funds before the end of the 5 year term, which could occur due to low demand by eligible applicants or inadequate promotion of the program. To avoid this risk, INCOG proposes to hire a PR firm to promote the program to eligible recipients in Tulsa MSA counties, and if substantial funding remains unexpended in the final years of the program, roll those remaining funds into public Level 2 charging investments to support further EV adoption in the community.

## Roles and Responsibilities

### Coalition Lead: INCOG

- CPRG Program Manager
- CPRG Program Coordinator
- Tulsa Area Clean Cities program staff

### Coalition Support: City of Tulsa

- Resilience Hub Manager
- Resilience Hub Coordinators (x3)

**GHG Reductions 2025-2030:** 9,145 mtCO<sub>2</sub>e

**GHG Reductions 2025-2050:** 45,724 mtCO<sub>2</sub>e



# ENERGY EFFICIENCY & WEATHERIZATION

**Funding Request: \$3,144,000**

## Description

This project would fund the rehabilitation of residential and commercial structures in LIDAC areas to improve energy efficiency through weatherization, lowering utility bills, and increasing resilience against extreme weather events and climate change. This will reduce the energy burden for low and moderate income households in the Tulsa MSA, benefiting households directly while significantly reducing GHG emissions.

## Features, Tasks, Milestones, and Risks

1. Identify neighborhoods of greatest need for energy-efficiency and weatherization rehabilitation.
  - a. Evaluate existing housing stock for age, condition, and the prevalence of low-income and other disadvantaged statuses.
  - b. Prioritize areas that lack tree canopy coverage.
2. Establish criteria for the work that should be produced, the amount of funding available to each resident, and the structure of any grant or loan program.
  - a. Ensure funding is made available for residents with the greatest needs and fewest financial resources.
3. Track program outcomes to inform future investments.
  - a. Conduct energy audits on each structure participating in the program to establish a baseline.
  - b. Collect energy savings information and anecdotal feedback from program participants to understand project outcomes and inform future funding needs.

## Roles and Responsibilities

### Coalition Lead: INCOG

- CPRG Program Manager
- CPRG Program Coordinator

### Coalition Support: City of Tulsa

- Resilience Hub Manager
- Resilience Hub Coordinators (x3)

**Contract Support:** Building contractor with an emphasis on energy efficiency and weatherization

**GHG Reductions 2025-2030:** 3,180 mtCO<sub>2</sub>e

**GHG Reductions 2025-2050:** 19,080 mtCO<sub>2</sub>e





# ENERGY EFFICIENT BUILDING CODES

**Funding Request: \$120,000**

## Description

The Energy Efficient Building Code Program (EECP) will provide education and incentives to encourage local governments located in the Tulsa MSA to adopt energy efficient building codes for new construction projects. Currently, there are no local governments located in the Tulsa MSA that have adopted any International Energy Conservation Codes more stringent than those required by the State of Oklahoma, which is the 2006 International Energy Conservation Code. Our program approach will be to employ an INCOG EECP Coordinator funded through CPRG to provide technical assistance to decision makers and administrative officials such as elected officials, planners, public works managers, and building officials to understand the value of adopting residential and commercial energy conservation building codes and help to resolve misconceptions about the negative implications of such codes.

## Features, Tasks, Milestones, and Risks

1. Work with communities to adopt the most up-to-date building codes that prioritize energy efficiency.
  - a. Create a recurring meeting with relevant stakeholders to share progress on code updates, lessons learned from early adopters, and strategies to encourage further adoption across the region.
2. Provide incentives for local governments and developers that chose to adopt codes or construct structures that go beyond the minimum requirements of the building code standards established by the State of Oklahoma.
  - a. Establish criteria for participation in an incentive program and the amount of funds to be set-aside for incentives.
  - b. Create branding for regional program participants to be displayed on websites and structures that demonstrate energy conservation design.

## Roles and Responsibilities

### Coalition Lead: INCOG

- CPRG Program Manager
- CPRG Program Coordinator
- CPRG Energy Efficient Building Code Program Coordinator

### Coalition Support: City of Tulsa

- Resilience Hub Manager
- Resilience Hub Coordinators (x3)

INCOG will hire and train a Energy Efficient Code Program(EECP) Coordinator that can communicate with a diverse group of stakeholders about the importance of implementing Energy Conservation Codes and provide the technical assistance and sample documents in order to facilitate their adoption by governing bodies. The program coordinator will attend public meetings, provide training, and conduct stakeholder outreach to achieve participation in the program. The program coordinator will manage the incentives elements of the EECP and ensure proper records are maintained.

**GHG Reductions 2025-2030:** 199,034 mtCO<sub>2</sub>e

**GHG Reductions 2025-2050:** 392,170 mtCO<sub>2</sub>e



# ENERGY EFFICIENCY REVOLVING LOAN

**Funding Request: \$4,000,000**

## Description

INCOG proposes to expand their existing Energy Efficiency Revolving Loan Fund (EERLF) to service the entire Tulsa MSA to enable more participation from eligible entities to reduce GHG emission, lower energy costs, and provide the opportunity to establish additional Resilience Hubs throughout the region. INCOG has administered a EERLF since 2014 for the five county INCOG service area in the Tulsa region. The fund was created in partnership with the Oklahoma Department of Commerce (OCOC) and the State Energy Office to provide the capital necessary for implementation of building energy efficiency retrofits, renewable energy installations, and demand management projects. The funding was established in 2009 through the American Recovery and Reinvestment Act-State Energy Program. The eligible entities to receive the funding include local governments, tribal governments, and public education institutions. Since 2014, there have been three project awards totaling \$1,600,000 and all the projects have been located at county government facilities to upgrade HVAC equipment, automated building management control equipment, high-efficiency water heating systems, LED lighting, insulation, and windows.

## Features, Tasks, Milestones, and Risks

The INCOG EERLF has developed program materials including a Request for Proposal document, template resolutions for governing bodies, proposal grading matrix, and contracts. The current EERLF is structured with fifteen (15) year terms with an annual percentage rate of one (1) percent. The program will have an annual goal of selecting two to three projects per year for funding. Furthermore, the program will make every effort to allocate all the funds for the EERLF before the end of the five (5) year grant term. There are potential issues that the program faces, most importantly is the inability for local governments to become indebted. There is not an awareness or capacity at every local government to establish a local authority or beneficiary trust of the local government to access the funding. In the past we have provided the necessary technical assistance to overcome this barrier and will continue to do so for the expanded program if funding is made available. Another possible risk associated with the program is a local government's inability to pay in full the loaned funds. Our contract address this scenario, but is still a risk associated with any lending program. There have not been any defaults or late payments of any participants in our existing EERLF program.

## Roles and Responsibilities

INCOG will administer the program as it currently does. The additional INCOG staff included in this proposal, CPRG Program Manager and CPRG Program Coordinator, will assume responsibility for the entirety of the program. INCOG will continue to work with our existing financial partner, Bank of Oklahoma, to maintain the loan and escrow accounts, receive payments, and provide financial statements for all the active loans. The City of Tulsa will provide program support through outreach activities.

### Coalition Lead: INCOG

- CPRG Program Manager
- CPRG Program Coordinator

### Coalition Support: City of Tulsa

- Resilience Hub Manager
- Resilience Hub Coordinators (x3)

**GHG Reductions 2025-2030:** 4,488 mtCO<sub>2</sub>e

**GHG Reductions 2025-2050:** 11,220 mtCO<sub>2</sub>e



# NEIGHBORWOODS

**Funding Request: \$3,150,000**

## Description

INCOG, in partnership with Up With Trees proposes to implement an initiative to plant and establish new and healthy trees in high need areas and disadvantaged communities. This program would plant 5,000 trees within Tulsa County communities over the next five years. The program will improve community and forest resilience to climate change, extreme heat, pests and diseases, and storm events through multiple efforts. The plantings will introduce significant biodiversity to the community forest. Plantings will be planned to maximize the benefits new trees will provide long-term, specifically utilizing i-Tree Design, to maximize shading of buildings, increase property values, and ensure the height and canopy spread of the tree at maturity is appropriate for the location.

## Features, Tasks, Milestones, and Risks

1. Develop a “Neighborwoods” program.
  - a. Promote community development in addition to greenhouse gas emission reductions by hosting tree planting events in neighborhoods identified with the greatest need using the CEJST in conjunction with the Tulsa Urban Forest Master Plan, with a particular focus on the residential areas that are in close proximity to industrial operations.
  - b. Up With Trees will plant 5,000 two-inch caliper or greater trees, mulch, water, warranty, and maintain (structural pruning, remulch as needed, and place and remove support hardware) the trees for a period of three years. This process ensures that the trees that are planted have a higher likelihood of reaching maturity, which is necessary to be an effective carbon sink.
  - c. Contracts with property owners will be created to ensure all responsible parties are aware of the participation requirements and “How to Care for Your Trees” best practices materials will be provided to participants.
  - d. The program goal will be to plant 1,250 trees per year at no cost to the property owner.
  - e. Up With Trees is not eligible to receive a direct subaward from the CPRG and a Request for Proposals will be required to identify the contractor for the program. Regardless of who the contractor is, Up With Trees is committed to supporting the program through technical assistance.

## Roles and Responsibilities

### Coalition Lead: INCOG

- CPRG Program Manager
- CPRG Program Coordinator

### Coalition Support: City of Tulsa

- Resilience Hub Manager
- Resilience Hub Coordinators (x3)

**Contract Support:** Non-profit tree planting and maintenance contractor

**GHG Reductions 2025-2030:** N/A - Immature trees are a negligible carbon sink.

**GHG Reductions 2025-2050:** 7,500 mtCO<sub>2</sub>e



## WETLAND RESTORATION AND RIPARIAN CONSERVATION

**Funding Request: \$2,270,188**

### Description

This project would expand on the widely successful ongoing work of the Oklahoma Conservation Commission and the Grand River Dam Authority (GRDA) to protect water quality in northeastern Oklahoma through riparian area conservation easements. Historically, these contracts have focused on protection of the Illinois River Watershed, but this year expanded to the Grand Lake Watershed. This partnership would build on our cooperative efforts by advancing established voluntary and cost-effective programs that aim to store carbon, reduce greenhouse gas emissions, preserve watershed functions, provide flood control, and enhance resiliency in the face of the changing climate.

### Features, Tasks, Milestones, and Risks

Oklahoma Conservation Commission and the Grand River Dam Authority (GRDA) will use sub-awarded funds to establish a conservation easement program and conduct a wetland restoration project within the Tulsa MSA. These programs will follow a similar pricing structure and outreach approach as used in the Illinois River and Grand Lake Watersheds, where the demand for these agreements outpaces the funding available. As such, additional funding provided through CPRG will enable quick implementation of this time-tested model while providing the opportunity and flexibility to pursue establishing conservation easements not only on pasture or forested lands in rural areas, but also riparian areas near and in municipalities that are being proposed for development.

### Roles and Responsibilities

#### Coalition Lead: INCOG

- CPRG Program Manager
- CPRG Program Coordinator

#### Coalition Support: City of Tulsa

- Resilience Hub Manager
- Resilience Hub Coordinators (x3)

#### Partner Support:

- Oklahoma Conservation Commission (OCC)
- Grand River Dam Authority (GRDA)

**GHG Reductions 2025-2030:** 32,365 mtCO<sub>2</sub>e

**GHG Reductions 2025-2050:** 161,825 mtCO<sub>2</sub>e



## 1.b Demonstration of Funding Need

In this current state, there is no strong environmental or sustainability foundation in northeast Oklahoma cities and towns. This stems from the lack of political will to prioritize funding for climate-based initiatives. Oklahoma lacks funding from political avenues to support programs to mitigate actions that are causing climate change. Oklahoma is at a critical junction where the state and MSA's are experiencing climate change events and actions such as droughts, severe weather events, and industry-driven pollution all the while receiving minimal support from oil-backed political advocates.

CPRG funding is crucial for Tulsa MSA to reduce their reliance on fossil fuels and seek other alternatives. Without it, none of these beneficial community based projects would get off the ground. Should the Tulsa MSA be awarded, it is expected that those funds would be implemented immediately in order to take advantage of the full scope of all of the projects.

### Explored Funding Opportunities

Funding Opportunity	Total Funding FY22-26	Agency	INCOG Action
2024 Low or No Emissions Grant Program (Low-No Program)	\$1,103,963,762	FTA, USDOT	Assisted
EPA Clean School Bus Program	\$5,000,000,000	EPA	Assisted
National Electric Vehicle Infrastructure (NEVI) Formula Program	\$66,300,000	ODOT	Assisted
Charging and Fueling Infrastructure Program	\$36,000,000	FHWA	Applied
Carbon Reduction Program (CRP)	\$2,100,000	ODOT	Awarded
Congestion Mitigation and Air Quality (CMAQ)	\$950,000	ODOT	Awarded
Environmental and Climate Justice Community Change Grants Program	Award Ceiling: \$20,000,000	EPA	In Application Phase
SEP BIL (IUA)	\$6,568,790	OK Commerce	Assisted
State Energy Program (SEP)			
Solar for All (through EPA)	\$80,000,000	OK Commerce	Assisted
Energy Efficiency and Conservation Block Grant (EECBG) Program	\$1,000,000	DOE	Assisted

## 1.c Transformative Impact

With the input of the local community, the strategies proposed in this application have diverse benefits that suit the needs of Tulsa MSA, both urban and rural. While Tulsa is no longer the largest producer and refiner of petroleum, it is still heavily dependent on fossil fuels. In order to adjust the mindset of Tulsa MSA residents to be less dependent on fossil fuels and to be more resilient to dramatic shifts in weather patterns, small changes to the lives of everyday citizens is where the most transformative impact will be made. Impacts such as environmental, health, economic, and social benefits would be greatly influenced by the proposed strategies.

By creating Resilience Hubs, education on the neighborhood-scale level to take action in reducing GHG emissions will enable residents throughout the MSA to make small, but impactful reductions on a larger scale. By offering EV incentives to make purchasing electric vehicles and electric operating equipment more accessible to purchase, it decreases the monetary burden that residents experience, and in turn increases economic output, as they would potentially spend that money into the local economy. Having an energy efficiency and weatherization program complements the previous programs as it lessens the energy burden that many residents in the Tulsa MSA experience and would increase economic vitality. Energy Efficiency

Revolving Loans offer the opportunity for local governments, tribal governments, and public institutions of education to receive loans. Increasing vegetation through the Neighborwoods project would have the potential for significant impact across all benefits, such as reducing urban heat island effect, creating shade, and creating social places. Restoring and conserving riparian areas and wetlands in Tulsa's rural areas has the potential to decrease soil erosion, store carbon and recycle organic matter and nutrients.

CPRG's funding would help INCOG to achieve these implementation goals that have a barrier of high costs that is associated with retrofitting existing infrastructure for efficiency, offering program incentives to reduce costs for LIDAC, planting and maintenance of trees, riparian areas, and wetlands to improve environmental health.

## 2. Impact of GHG Reduction Measures

In collaboration with INCOG's coalition and partnerships, 7 projects were selected based on certain criteria such as: Would this project have a willing coalition or partner? Is this project cost-effective for the amount of greenhouse gases it would reduce? Does this project align with what the community is asking for? Having asked those questions, these reduction strategies selected are anticipated to be goals that are achievable for the Tulsa MSA in the short term (2025-2030) and long term (2025-2050) in reducing greenhouse gas emissions.

### 2a. Magnitude of GHG Reductions from 2025 through 2030

Reduction Measure	Emissions Reduction (mtCO <sub>2</sub> e)
Resilience Hubs	6,620
Electric Vehicles and Equipment Incentives	9,145
Energy Efficiency and Weatherization	3,180
Energy Efficient Building Codes	199,034
Energy Efficiency Revolving Loan	4,488
Neighborwoods	N/A (immature trees are a negligible carbon sink)
Wetland Restoration and Riparian Conservation	32,365
<b>Total</b>	<b>254,832</b>

### 2b. Magnitude of GHG Reductions from 2025 through 2050

Reduction Measure	Emissions Reduction (mtCO <sub>2</sub> e)
Resilience Hubs	33,020
Electric Vehicles and Equipment Incentives	45,724
Energy Efficiency and Weatherization	19,080
Energy Efficient Building Codes	392,170
Energy Efficiency Revolving Loan	11,220
Neighborwoods	7,500
Wetland Restoration and Riparian Conservation	161,825
<b>Total</b>	<b>670,539</b>

### 2c. Cost Effectiveness of GHG Reductions

The table below shows the cumulative GHG emissions reductions both between 2025 and 2030 and between 2025 and 2050, as well as the relative cost-effectiveness of each reduction measure. Cost effectiveness was calculated by dividing the Requested CPRG Funding by the 2025-2050 emission reduction values. Documentation of GHG reduction assumptions, calculations, relevant resources and models, and any uncertainties with the estimates are provided in the Technical Appendix.

Reduction Measure	Requested CPRG Funding	GHG Emissions Reductions (mtCO <sub>2</sub> e)		Cost Effectiveness (\$/mtCO <sub>2</sub> e)
		2025-2030	2025-2050	
Resilience Hubs	\$9,965,752	6,620	33,020	\$301.81
Electric Vehicles & Equipment Rebate Program	\$1,000,000	9,145	45,724	\$21.87
Energy Efficiency & Weatherization Program	\$3,144,000	3,180	19,080	\$164.78
Energy Efficient Building Codes Program	\$120,000	199,034	392,170	\$0.31
Energy Efficiency Revolving Loan Program	\$4,000,000	4,488	11,220	\$356.51
Neighborhoods Program	\$3,150,000	N/A	7,500	\$420.00
Wetland Restoration and Riparian Conservation	\$2,270,188	32,365	161,825	\$14.03
<b>TOTAL</b>	<b>23,649,940</b>	<b>254,832</b>	<b>670,539</b>	<b>\$35.27</b>

## 2d. Documentation of GHG Reduction Assumptions

\*Refer to Technical Appendix explaining the assumptions and methodology of for determining estimated GHG emission reductions for each proposed measure.

## 3. Environmental Results - Outputs, Outcomes, and Performance Measures

### 3a. Expected Outputs and Outcomes

#### Resilience Hubs

The expected output of Resilience Hubs will be the implementation of retrofitting existing buildings by adding energy efficient windows, replacing HVAC systems, increasing installation, and updating the building to maximum energy efficiency standards. The output of Resilience Hubs will be that it provides, from start to finish, neighborhood support in under community-wide locations such as local libraries and schools. Resilience Hubs foster community cohesion and resilience by providing services to support housing, economic development, and quality of life particularly in under-resourced communities. The second output would be that, with the retrofits and energy efficiency improvements, comes a reduction of lower energy usage, and in turn lower costs and lower emission outputs.

#### Electric Vehicles and Equipment Rebate

With 40% (\$\$) of the money for EV incentives dedicated to LIDAC Communities, it will reduce the payment costs of purchasing electric vehicles and electric powered equipment, reduced emissions output, and cleaner air (along with reduced co-pollutants such as ozone).

#### Energy Efficiency and Weatherization

Energy Efficiency and Weatherization projects will have an output of retrofitting residential and commercial buildings with energy efficient equipment such as new windows, HVAC systems, lighting, solar panels. Those outputs have an expected outcome such as reducing the energy burden on households and businesses by reducing costs while lowering overall emission outputs.

#### Energy Efficiency Revolving Loan

The output of the Energy Efficiency Revolving Loan Fund has the capacity of financing energy projects for upgrading and retrofitting existing buildings and facilities. This produces an outcome of reduced emissions, net energy savings, and lower costs overall.

#### Energy Efficient Building Codes

Energy Efficient Building Codes will have an output of advancing and implementing energy efficient building codes on new construction and renovated infrastructure. This outcome will set a positive standard for the

adoption, compliance, and implementation of building codes in the Tulsa region. Reduced energy output has a positive effect by minimizing the stress on the local power grid, reduces emissions, and achieving maximum savings that otherwise wouldn't be achieved without the implementation of energy efficient building codes.

### Neighborhoods

Expanding Tulsa MSA's tree canopy coverage output will have residents that want to participate to plant trees on their properties. Expanding a region's tree canopy coverage has the potential to decrease urban heat island effect and increase shade in urban areas and along rivers and streams (reducing the temperatures of the water). If shade is provided around buildings and streets, it would also potentially lower energy usage and lower the cost. After their 10-year maturation period the carbon sequestration benefits of planting trees has a benefit by taking in carbon into the soil and tree roots.

### Wetland Restoration and Riparian Conservation

Wetland Restoration and Riparian Conservation has expected outputs of connecting with farm and land-owners to implement conservation easements, as well as incentivizing farm owners that have cattle to fence off their properties from river and streambanks. This output over time will reduce the erosion along banks of rivers and streams letting them naturally restore themselves while conserving the health of the soil, allowing for increased carbon sequestration.

## 3b. Performance Measures and Plan

INCOG will track and measure progress toward achieving the said goals of each proposed strategy through biennial reporting. This oversight will come from the dedicated concurrent positions proposed, the CPRG Project Manager and CPRG Project Coordinator. Once funded INCOG, each reporting period, will require submissions of reports, project construction quotes and invoices, milestones, roadblocks, and any additional details that pertain to the livelihood of the projects. INCOG has established ideal performance measures to track progress of implementation projects:

- Biennial tracking and reporting of project progress on expenditures and purchases (quotes, invoices, voucher distributions) to ensure that project is staying within budget.
- Biennial tracking, qualitatively and quantitatively measuring, and reporting project timelines from INCOG's coalition and partnerships.
- Continued community engagement sessions to engage and educate the public about what projects have to offer and receive feedback.
- Estimated and actual GHG emission reductions from each project.

## 3c. Review of Authority

As the lead entity, INCOG reviewed the authority of the two coalition members (INCOG, City of Tulsa), and our partner organization for the Wetland Restoration and Riparian Conservation Program. Each entity is authorized by Oklahoma State Statute to conduct the activities identified for each reduction measure project.

Reduction Measure	Implementing Agency	Statutory Authority
Resilience Hubs	City of Tulsa, INCOG	OK Constitution Article XVIII.Sec3; 74-§1001
Electric Vehicles & Equipment Rebate Program	INCOG	74-§1001
Energy Efficiency & Weatherization Program	INCOG	74-§1001
Energy Efficient Building Codes Program	INCOG	74-§1001
Energy Efficiency Revolving Loan Program	INCOG	74-§1001
Neighborhoods Program	INCOG	74-§1001
Wetland Restoration and Riparian Conservation Program	INCOG, Oklahoma Conservation Commission	74-§1001; 27A-§1-1-201.13.d



### 3d. Implementation Timeline and Milestones

Activity	Start Date	End Date
Notice of Funding Selection	7/1/2024	7/31/2024
Anticipated Award Assistance Agreement	10/1/2024	10/30/2024
<b>Meetings</b>		
Stakeholder Outreach	8/1/2024	10/30/2024
Interagency Meetings	8/1/2024	1/31/2025
Stakeholder Meetings	8/1/2024	1/31/2025
Meetings with Tribes	8/1/2024	1/31/2025
Community Engagement	8/1/2024	9/30/2029
<b>Reports</b>		
Quarterly Reports	1/1/2025	9/30/2029
Final Report	9/1/2029	9/30/2029
<b>Staffing</b>		
Announce Positions and Recruit New Staff	11/1/2024	2/28/2025
Identify Program Marketing Partners	11/1/2024	1/31/2025
Identify Community Engagement Partners	11/1/2024	1/31/2025
<b>Subawards and Partnerships</b>		
Draft Scope of Work	10/1/2024	11/30/2024
Develop Subaward Agreements	12/1/2024	1/31/2025
Approve Subaward Agreements	2/1/2025	3/31/2025
<b>Resilience Hubs</b>		
Draft Scope of Work for RFP	8/1/2024	10/31/2024
Issue RFP	11/1/2024	1/31/2025
Interview Contractors	2/1/2025	4/30/2025
Select Contractors	5/1/2025	6/30/2025
Approve Contracts	4/1/2025	8/31/2025
City of Tulsa Staffing Process	2/1/2025	5/31/2025
City of Tulsa Staff Training	6/1/2025	12/31/2025
Construction of EE and Renewables	9/1/2025	6/30/2026
Construction Inspections	9/1/2025	6/30/2026
<b>Energy Efficiency and Weatherization Program</b>		
Program Design and Guidance	10/1/2024	5/31/2025
Issue RFP for Contractors	1/1/2025	5/31/2025
Identify Retail Vendor Partners	1/1/2025	5/31/2025
Approve Contracts	6/1/2025	7/31/2025

Launch Website and Registration Portal	7/1/2025	8/31/2025
Conduct Outreach Campaign	1/1/2025	8/31/2025
Program Implementation Kickoff	9/1/2025	9/30/2029
<b>Electric Vehicle and Equipment Program</b>		
Develop Program Guide	7/1/2024	6/30/2025
Internal Staff Training	3/1/2025	6/30/2025
Program Implementation	7/1/2025	9/30/2029
<b>Neighborhoods Program</b>		
Develop Program Design and Guidance	10/1/2024	9/30/2029
Identify Vendor Partners and Issue RFP	1/1/2025	9/30/2025
Launch Website and Registration Portal	7/1/2025	8/31/2025
Conduct Outreach Campaign	1/1/2025	9/30/2025
Program Implementation	9/1/2025	9/30/2029
<b>Energy Efficiency Building Code Program</b>		
Stakeholder Engagement	10/1/2024	9/30/2029
Develop Program Materials	10/1/2024	7/31/2025
Provide Program Technical Assistance	7/1/2025	9/30/2029
Program Implementation	7/1/2025	9/30/2029
<b>Revolving Loan Program</b>		
Stakeholder Engagement	7/1/2025	9/30/2029
Solicit Proposals	2/1/2025	6/30/2025
Approve Contracts	7/1/2025	8/31/2025
Implementation	2/1/2025	9/30/2029
<b>Wetland Restoration and Riparian Conservation Program</b>		
Wetland Site Assessments and Project Planning	5/1/2025	2/28/2026
Wetland Land Acquisition and Appraisal	5/1/2026	4/30/2027
Wetland Earthwork and Vegetative Planting	1/1/2027	12/31/2028
Develop Tulsa MSA Conservation Easement Target Participant Strategy	10/1/2024	6/30/2025
Community Engagement and Outreach in Target Areas	7/1/2025	4/30/2028
Issue Easement Contracts	11/1/2025	3/31/2029
Monitor Wetland and Riparian Area Projects	11/1/2025	7/31/2029
Publish Status Report	8/1/2029	9/30/2029

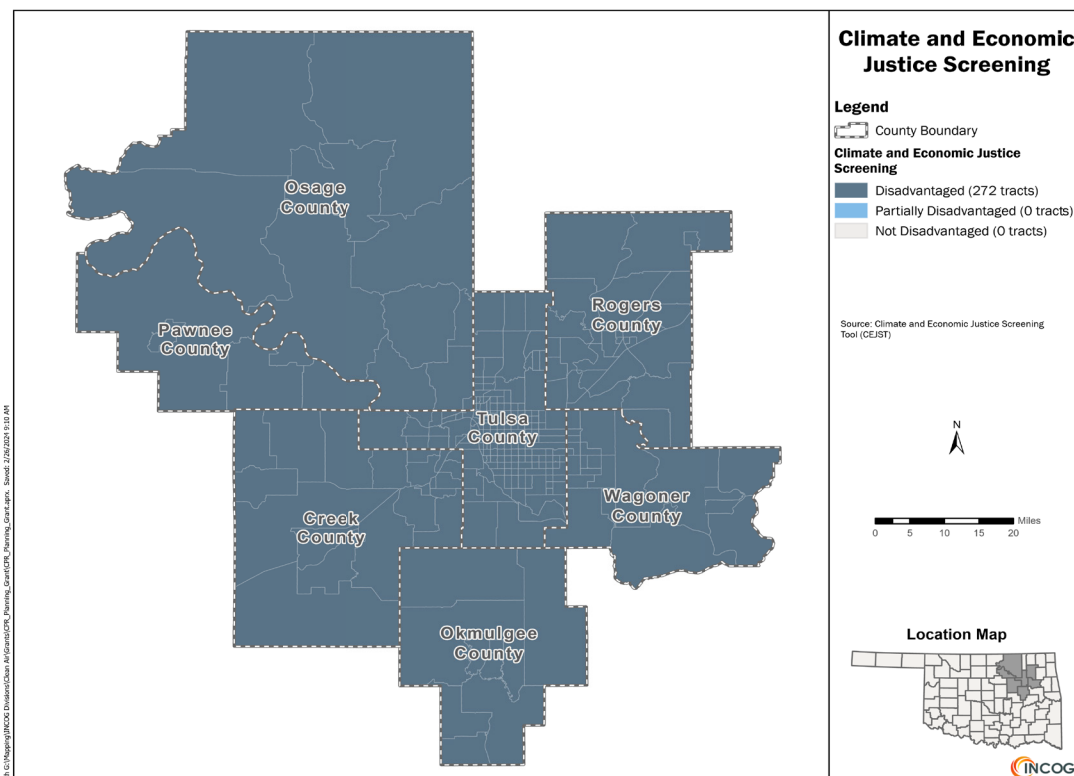
## 4. Low-Income and Disadvantaged Communities

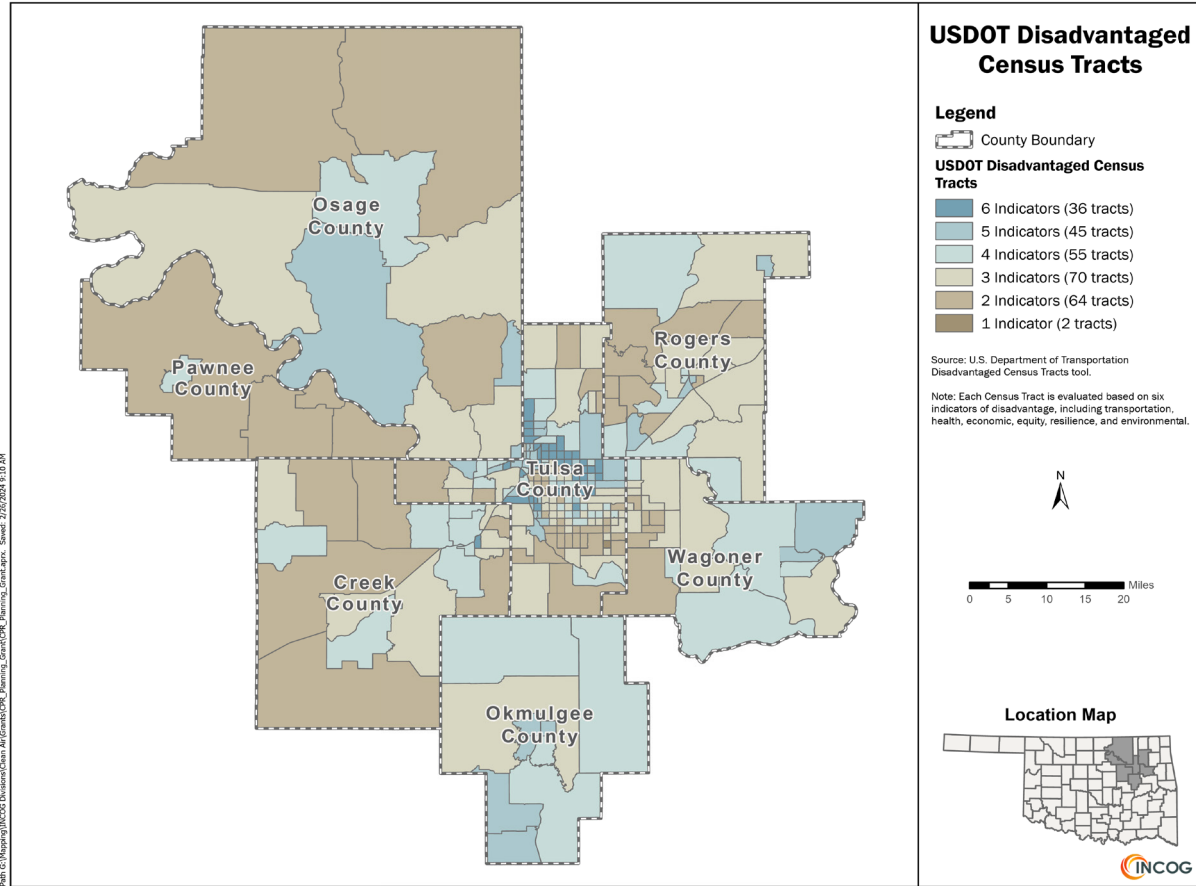
All of the Census Tracts in the Tulsa MSA are considered LIDAC according to the CJEST Screening Tool. This is due to the region's overlap with five tribal reservations.

According to the most recent American Community Survey (ACS), the Tulsa MSA has a total population of 1,017,724 people making it the second largest MSA in Oklahoma after Oklahoma City. Tulsa County accounts for 65.7% of the MSA population, with 668,923 people. The remaining 6 counties make up the remainder of 34.3% of the total MSA population, with a 348,801 people.

The poverty rate for the Tulsa MSA is 13.5%, though there is variation among the 7 counties. On the high end, Okmulgee County has a poverty rate of 18.0%, and on the low end, Wagoner County has a poverty rate of 9.2%. By race and ethnicity, the Tulsa MSA is as follows: 62.9% White (non-Hispanic), 10.8% Hispanic, 7.8% Black (non-Hispanic), 6.9% American Indian (non-Hispanic), 2.8% Asian (non-Hispanic), 8.5% Two or More Races (non-Hispanic), and 0.4% Single Other Race (non-Hispanic). Again, there is substantial variation among the 7 counties with regard to the distribution of minority racial and ethnic groups. For example, Creek County, Okmulgee County, Osage County, and Rogers County all have greater than 10% American Indian (non-Hispanic) population, while Tulsa County has 13.7% Hispanic population. The region has a higher rate of Two or More Races (non-Hispanic) than other areas of the country due in part to tribal nation citizenship.

Because there are five American Indian tribal reservations that overlap with the Tulsa MSA, the entire Tulsa MSA is considered Disadvantaged according to the Climate and Economic Justice Screening Tool. However, when determining which geographies to prioritize for projects to ensure LIDAC benefits, it is important to distinguish between locations based on the number of disadvantages faced. To achieve this, data from the UDSDOT Disadvantaged Census Tracts was used, and six indicator categories were selected. These include the disadvantage indicator categories of transportation, health, economic, equity, resilience, and environmental. By mapping the number of disadvantages, focus areas emerge in the Tulsa MSA. The Census Tracts that have all six disadvantages are largely clustered in the city limits of Tulsa, especially in west, north, and east Tulsa, which are the areas where the Resilience Hubs component of this application will be constructed. Rural areas of Creek, Wagoner, Okmulgee, and Osage County also have a high level of disadvantages in their corresponding Census Tracts.





### Census Tracts with 6 indicators of Disadvantage

Census Tract	County
40037021300	Creek
40143000100	Tulsa
40143000300	Tulsa
40143000400	Tulsa
40143000500	Tulsa
40143001300	Tulsa
40143001400	Tulsa
40143001500	Tulsa
40143001600	Tulsa
40143001700	Tulsa
40143002301	Tulsa
40143003000	Tulsa
40143004600	Tulsa
40143006000	Tulsa
40143006200	Tulsa
40143006701	Tulsa
40143006801	Tulsa
40143006804	Tulsa

Census Tract	County
40143006905	Tulsa
40143007102	Tulsa
40143007200	Tulsa
40143007304	Tulsa
40143007305	Tulsa
40143007310	Tulsa
40143007311	Tulsa
40143007312	Tulsa
40143007609	Tulsa
40143007617	Tulsa
40143007900	Tulsa
40143008002	Tulsa
40143008200	Tulsa
40143008501	Tulsa
40143008600	Tulsa
40143008900	Tulsa
40143009008	Tulsa
40143009101	Tulsa



## 4a. Community Benefits

Based on the greenhouse gas emissions reduction measures identified in Section 1 of this workplan, there are significant potential community benefits for LIDAC residents in the Tulsa MSA.

The Resilience Hubs project in the Government Facilities section of the reduction measures offers many benefits specifically targeted at LIDAC residents. These locations would serve as resources for LIDAC residents for protection during extreme heat and other weather events, as well as venues for trainings for residents to learn how to reduce greenhouse gas emissions, improve resilience, and lower energy bills in their homes and neighborhoods. This will have the added benefit of increasing connections between neighborhood residents, which adds resilience to emergency response activities during natural disasters.

The EV Rebate program will reduce various emissions from automobiles, including ozone precursors, particulate matter, and greenhouse gases. These reductions will lead to improved health outcomes for LIDAC residents by reducing rates of asthma and other respiratory conditions. Additionally, rebates for electric vehicle purchases will increase physical and economic mobility by reducing costs associated with transportation.

The Energy Efficiency and Weatherization project the reduction measures specifically targets benefits to low-income households by reducing utility costs and exposure to heat-related illnesses, mitigating indoor air quality concerns, and reducing other co-burdens experienced by energy-burdened households.

Finally, the Increasing Vegetation section of the reduction measures will increase tree canopy and other vegetation in LIDAC neighborhoods, further decreasing energy usage and costs, as well as mitigating against the Urban Heat Island Effect.

Because there are five American Indian tribal reservations that overlap with the Tulsa MSA, the entire Tulsa MSA is considered Disadvantaged according to the Climate and Economic Justice Screening Tool. However, when determining which geographies to prioritize for projects to ensure LIDAC benefits, it is important to distinguish between locations based on the number of disadvantages faced. By mapping the number of disadvantages focus areas emerge in the Tulsa MSA. In particular, North Tulsa and East Tulsa, as well as unincorporated rural areas in Osage County, Okmulgee County, and Wagoner County, face the greatest disadvantages in the region.

## 4b. Community Engagement

In order to develop the workplan that would reflect the needs of the LIDAC community, a great deal of community engagement, research, analysis, and strategizing to identify key greenhouse gas emissions reduction measures were completed.

### Community Survey

In coordination with the Oklahoma Department of Environmental Quality (ODEQ) and the University of Oklahoma, INCOG distributed and promoted a survey for LIDAC community members and stakeholder organizations in the Tulsa area to identify priority GHG emissions issues. The results of this survey showed that the highest priority initiatives for those surveyed include:

- Planting native trees (and other plants) and using shade structures to reduce the Urban Heat Island Effect
- Low-cost upgrades to improve energy efficiency for residents
- Making public transit more accessible and affordable
- Updating to more energy efficient building standards and codes

The results of this survey were consistent with what was heard through other engagement activities, indicating that the issues that face LIDAC communities do not differ greatly from the issues that concern all people in the Tulsa region with regard to the effects of unchecked greenhouse gas emissions. These findings were incorporated into the reduction measures later in Tulsa MSA PCAP.

## Engagement Activities

INCOG coordinated and hosted several local events to gather input from community members and stakeholder organizations between the months of November 2023 and February 2024.

INCOG hosted a cooperative public meeting with ODEQ on December 7th at Oklahoma State University's Tulsa campus to solicit feedback on potential projects for the CPRG program. Attendees included members of the general public, industry representatives, and government entities.

A CPRG Summit was held on January 18th at a community center in Tulsa, which included a presentation and panel discussion offering perspectives on developing and implementing strategies to reduce greenhouse gas emissions in Oklahoma. Panel members included Sarah Terry-Cobo with the City of Oklahoma City's Office of Sustainability, who discussed on the City's 2021 sustainability plan and the progress towards implementation; Montelle Clark with the Oklahoma Sustainability Network, who focused on the mechanisms of State government that enable or hinder progress towards greenhouse gas emissions; Ryan Baze from the City of Broken Arrow, who touched on the utilization of EPA grant funding to implement energy efficiency improvements to public facilities in Broken Arrow; and Noah Oaks from the South-Central Partnership for Energy Efficiency as a Resource (SPEER), who provided insights on energy efficiency code and stretch code. The meeting was well attended with elected officials and municipal department directors, engineers, and planners from numerous cities and counties in the region.

INCOG staff collaborated with the University of Oklahoma College of Architecture to host a series of public meetings with LIDAC neighborhoods in Tulsa and a town hall with the presentation and discussion in Spanish. INCOG partnered with ODEQ and University of Oklahoma faculty to host a series of Technical Assistance Forums with the public. Three meetings were held, each with a specific focus, including:

1. The effects of climate change on LIDAC populations and reduction measures that prioritize the outcomes of these populations
2. Community benefits
3. Reduction measures for the transportation sector

INCOG staff met weekly with EPA Region 6 members for CPRG coordination meetings, learning best approaches for the development of the PCAP, potential reduction measures, and building relationships with peers in cities across Region 6.

The CPRG program and the PCAP process were presented at the monthly INCOG Board of Directors meeting to spread knowledge of the program to leaders across the region. The INCOG Board of Directors comprises 56 members from 17 cities and towns, 5 counties, and 3 tribal nations (Cherokee Nation, Muscogee Nation, and Osage Nation). This presentation alerted member governments to the upcoming regional virtual meeting to field input and project ideas to complement the input from the preceding events and to ensure that more rural areas of the region had a fair opportunity to participate in the way that larger municipalities in the region had.

INCOG staff coordinated with statewide environmental advocacy organizations to field input and promote the public meetings. Public promotional posts and discussions were made on social media with leaders of these organizations.

INCOG staff also coordinated closely with the City of Tulsa's Mayor's Office of Resilience and Equity to ensure that the largest city in the region is well apprised of the process, progress towards the development of the PCAP, and what reduction measures are the highest priority of community members in Tulsa and the greater Tulsa region.

## 5. Job Quality

The proposed programs include a variety of reduction strategies that cut across multiple GHG emission sectors. This “all of the above” approach will result in a diversity of investments that will reach a broad workforce. The grant program’s funded personnel, contractors, and partners will result directly in high quality jobs. The contracts for energy audits, energy efficient equipment installations, weatherization upgrades, renewable energy installations, tree planting, and construction of wetlands will generate a significant portfolio of work to be completed as the INCOG CPRG programs are implemented. INCOG will work with retail stores and auto dealerships to facilitate the Electric Vehicle and Equipment Program’s purchase incentives. These incentives are intended to facilitate increased adoption of new clean energy vehicles and equipment, which will likely increase commerce at participating businesses.

INCOG will prioritize women and minority owned businesses when soliciting Requests for Proposals and selecting contractors for services required to implement the INCOG CPRG programs. INCOG has extensive experience selecting and working with contractors through their administration of multiple federally funded programs and projects. This experience includes compliance with Davis-Bacon Wage requirements and Section 3, which help ensure adequate wages and inclusion of low-income local workforce participants on projects and programs that INCOG provides administration on.

INCOG has established relationships with local workforce development providers such as Oklahoma State University, Langston University, University of Tulsa, University of Oklahoma, Tulsa Technology Center, and Tulsa Community College. INCOG will call upon these institutions of learning to provide the training and education to the new labor force required to implement the technology and programs of this proposal. Furthermore, INCOG has worked with and will work with local labor unions to identify contractors with strong labor standards to solicit Requests for Proposals for contractors for implementation projects.

## 6. Programmatic Capability and Past Performance

INCOG was established as a Council of Governments in 1967 and has a long history of successfully managing and completing federal and non-federal assistance programs. As the Metropolitan Planning Organizations (MPO) for transportation planning, INCOG facilitates a cooperative effort with federal, state, and local governments and other transportation agencies to assess the area's transportation requirements and to develop comprehensive, multi-modal plans and programs that address the needs and goals of the region.

INCOG identifies funding sources and receives funding from federal and non-federal assistance agreements to create solutions for local and regional challenges in a wide array of program areas, such as comprehensive planning, transportation, community and economic development, environmental quality and energy programs, public safety, and services for older adults. INCOG understands federal contract and procurement requirements, Buy America and Build American requirements, Americans with Disabilities Act requirements, Uniform Relocation Assistance and Real Property Acquisition Act requirements, National Environmental Policy Act, HUD-Section 3, National Historic Preservation Act, and Davis Bacon Act requirements. INCOG has successfully administered HUD CDBG grants on behalf of member communities for over forty years. In 2010, INCOG was designated the Area Agency on Agency to administer funding from the Older American Act. INCOG was designated as an Economic Development District by the U.S. Department of Commerce in 2008 and has maintained a Comprehensive Economic Development Strategy that has resulted in several federal and non-federal assistance agreements that have resulted in improved infrastructure and private investment in the region.

### 6a. Past Performance

#### **Climate Pollution Reduction Grant (CPRG) - Tulsa Metropolitan Area Priority Climate Action Plan**

**Funding Agency:** Environmental Protection Agency

**Funding Amount:** \$1,000,000 (formula)

**Description:** In FY'23 INCOG received the Tulsa MSA CPRG Planning Grant formula allocation for the development of the region's first dedicated plan to reducing greenhouse gas emissions.

**Status:** INCOG has completed one of four deliverables, the Priority Climate Action Plan was submitted on time and met all the EPA required elements. The project is still ongoing and two required quarterly reports have been approved since the assistance agreement was executed between the EPA and INCOG. Regular contact is maintain with the EPA Region XI Project Officer and all tasks are meeting the timeline provided with the workplan.

#### **Rebuilding American Infrastructure and Sustainability and Equity (RAISE) - Tulsa-Jenks Multi-Modal Safety Project**

**Funding Agency:** Federal Highway Administration

**Funding Amount:** \$16,200,000 (discretionary)

**Description:** Awarded in FY'22, the project will safely connect the river trail system to a voter-approved, locally funded, future south Tulsa/Jenks low-water dam project. The project, which includes 7.75 miles of trails, will connect the Turkey Mountain Urban Wilderness and Riverwalk Crossing on the west side of the Arkansas River with a trailhead in the vicinity of the Creek Turnpike. On the east side of the river, the trail from the River Spirit Casino to the 96th Street Bridge (City of Jenks) will be reconstructed, and a new trail will be built along the river, connecting to a trailhead near the Creek Turnpike. Additionally, the project will provide roadway and signal infrastructure improvements to connect all transportation system users along Riverside Drive between 81st and 101st streets, making it safer and easier to access the riverfront for recreation and economic development opportunities and the trail system. Improvements will include traffic signal upgrades and signal coordination, enhanced crosswalks and pedestrian countdown signals, and ADA compliant sidewalks. The project funding is being matched with \$3 million from the City of Tulsa and \$1.05 million from the City of Jenks. INCOG is working in collaboration with partners Muscogee (Creek) Nation, City of Tulsa, City of Jenks, and River Parks Authority on the project which is expected to be completed by late 2027.



**Status:** INCOG and Federal Highway Administration executed the grant agreement in December 2023. A design firm has been selected for the project through a Request for Qualifications process.

### **Build Back Better Regional Challenge Phase I (BBBRC)-Tulsa Regional Advanced Mobility Corridor**

**Funding Agency:** Economic Development Administration

**Funding Amount:** \$500,000 (discretionary)

**Description:** The project builds upon the region's historic aviation and manufacturing successes to develop a new advanced mobility regional growth cluster. The funding of the Build Back Better Phase 1 provided funding for a Tulsa coalition, led by INCOG, to develop a Phase II Build Back Better application and promote the new advanced mobility Corridor.

**Status:** The funding and success of the Build Back Better Phase 1 award enabled Tulsa to go on and receive an investment of \$38 Million to enable the development of the Tulsa Regional Advanced Mobility (TRAM) Corridor. The funds were used by a Tulsa-based coalition of organizations from the government, nonprofit, academia, and private sectors, including the Indian Nations Council of Governments and Tulsa Innovation Labs, among others, to create the TRAM Corridor.

The TRAM Corridor proposed four projects to attract and support growth in the advanced mobility space in Tulsa. The four projects which received EDA investment are:

- Establishing a 114 nautical mile, Beyond Visual Line of Sight (BVLoS) commercial flight corridor
- Increasing R&D activity in the region by opening the LaunchPad Research and Technology Center located at Oklahoma State University-Tulsa, focused on developing new technologies to meet rapidly-evolving industry needs in the advanced mobility sector
- Increasing the region's skilled workforce through the funding of certificate programs, degree programs, and apprenticeships as well as the development of a Labor Market Observatory to consistently track and align the needs of the Advanced Mobility industry to the region's talent
- Constructing a new industrial treatment facility that will treat over 4 million gallons per day of wastewater to make 2,200 acres of industrial property "pad-ready" to attract advanced mobility industries to the Tulsa Port of Inola.

### **Section 5310 - Enhance Mobility of Seniors and Individuals with Disabilities**

**Funding Agency:** Federal Transit Administration

**Funding Amount:** \$950,000 (formula)

**Description:** The Section 5310 Program aims to improve mobility for seniors and individuals with disabilities by removing barriers to transportation service and expanding transportation mobility options. INCOG is the designated recipient of Section 5310 funding for the Tulsa region.

**Status:** INCOG has allocated Section 5310 funds through FY 23. It is an ongoing program in which INCOG selects projects, enters into project agreements and monitors sub-recipients, prepares quarterly reports, aiding in the development of the annual reporting requirements of the Federal Transit Administration. The Section 5310 program has provided thousands of rides, assisted in the purchase of numerous ADA-equipped vehicles for providers, and assisted in providing operating funds for sub-recipients to be able to provide transportation to seniors and individuals with disabilities. Regular contact is maintained with the Federal Transit Administration Project Officer and all tasks are completed within the time frame requested.

### **Safe Streets and Roads for All - Travel with Care Tulsa**

**Funding Agency:** U.S. Department of Transportation

**Funding Amount:** \$21,200,000 (discretionary)

**Description:** In FY'22 INCOG was awarded the grant which partners with Tulsa County, Wagoner County, City

of Tulsa, City of Broken Arrow, City of Jenks, City of Owasso to take a systemic approach to improving safety with low-cost, high-impact rural and urban projects. The Project are focused on making intersections safer using proven safety countermeasures, and include upgrading traffic signal backplates, incorporating yellow arrow signal heads, installing advance warning signage for intersections, adding enhanced stop-controlled intersection signage, LED stop signs, and installing rectangular rapid-flashing beacons at pedestrian crossings.

**Status:** INCOG and Federal Highway Administration executed the grant agreement in January 2024. A design firm has been selected for the project through a Request for Qualifications process.

### **Clean Cities and Communities - Tulsa Area Clean Cities Coalition**

**Funding Agency:** Department of Energy

**Funding Amount:** \$110,000 (formula)

**Description:** Since 1997, the Tulsa Area Clean Cities Coalition (TACC), under the auspices of INCOG, has served to increase energy security, reduce fleet operating costs, and improve the environment by working locally to advance affordable, domestic transportation fuels, energy efficient mobility systems, and other fuel-saving technologies and practices. Together, these actions create economic opportunity and improve public health in Eastern Oklahoma. Through the collective efforts of the Coalition's over 60 public and private sector stakeholders, INCOG contributed to over 33,657 tons of carbon dioxide-equivalent emissions reductions in 2022 alone, up 330% from 2012, with continued growth in reductions each year. Further, TACC's efforts in infrastructure development, workforce training, and public awareness and education have catalyzed transportation sustainability efforts throughout the Tulsa MSA and state.

**Status:** TACC has maintained its designation with the U.S. Department of Energy since 1997, having completed its most recent re-designation in 2023.

### **6b. Reporting Requirements**

INCOG has substantial experience in meeting the reporting requirements under the assistance agreements described above, that span decades of grant agreements. INCOG has always provided acceptable final technical reports and status reports for the assistance agreements they have entered with federal or state agencies. INCOG staff have always maintained extensive records and provided complete and timely progress reports as required by grant agreements. INCOG has always procured an independent annual audit that includes the review of the Reports Required by the Uniform Guidance for each federal award included in INCOG's Schedule of Federal Awards as required by 2 CFR Part 200. The annual audits for many years have been unmodified with no findings.

### **6c. Staff Expertise**

INCOG has a staff of approximately forty-five (45) people who work in a variety of programs that are all funded at least in part by federal or non-federal assistance agreements by a diverse group of funding agencies as indicated under section 6.a. above. All staff members are involved with a grant administrative function and participate in the successful delivery of the expected outputs and outcomes under the agreements. INCOG's Office of Energy and Environment staff, who will administer the CPRG Implementation award consists of a director of programs and five environmental planners with extensive experience in grant management. All five of the positions are funded through federal or non-federal assistance agreements and each team member is a participant in the reporting requirements and success of deliverables.

## 7. Budget and Timely Expenditure of Grant Funds

### 7a. Budget Detail

Project ID	Project Name	Total Cost	% of Total
1	Resilience Hubs	\$9,965,752	35.6%
2	Electric Vehicles & Equipment Rebate Program	\$1,000,000	\$3.6%
3	Energy Efficiency & Weatherization Program	\$3,144,000	11.2%
4	Energy Efficient Building Codes Program	\$120,000	0.4%
5	Energy Efficiency Revolving Loan Program	\$4,000,000	14.3%
6	Neighborhoods Program	\$3,150,000	11.2%
7	Wetland Restoration and Riparian Conservation Program	\$2,270,188	8.1%
8	CPRG Administration	\$4,370,831	15.6%
<b>Total</b>	<b>Total CPRG Request</b>	<b>\$28,020,771</b>	<b>100%</b>

### 7b. Expenditure of Awarded Funds

INCOG will review annually program participation and correlating expenditures to ensure that budgeted funds will be expended in a timely and efficient manner. INCOG proposes that the unexpended funds at the end of each budget period will roll over into the subsequent budget period until budget period year four (4). After the review of expenditures and remaining balances in budget year three (3), if it is determined that some programs are receiving more participation than others, a budget amendment will be submitted to EPA requesting to reallocate the funds from the underperforming program to those programs that are utilizing more grant resource because of their stronger participation. If after budget year four (4) there appears to be budgeted funds that will not be exhausted through incentive programs participation and operating costs, INCOG proposes two contingencies in order to address the remaining funds. The first proposal is to make any anticipated surplus funds available to install public Level 2 EV charging stations in LIDACs with a focus of placing them near multifamily housing in order to help address Oklahoma's Level 2 EV charging deficit and reduce barriers to electric vehicle adoption. If the Level 2 EV charging infrastructure installations do not adequately exhaust the surplus budgeted grant funds, the second contingency proposal is INCOG will request that the remaining funds are placed in the INCOG Revolving Loan Program to award funds to qualifying proposals that were not funded in previous Request for Proposals solicited by INCOG.

