

Climate Pollution Reduction Grants – Planning Grants Missouri State Planning Grant Work plan

WORK PLAN SUMMARY:

The Missouri Department of Natural Resources will use planning grant funding from the Climate Pollution Reduction Grants program to develop climate action plans and reports covering the geographic area of the State of Missouri. Because the State includes two Metropolitan Statistical Areas likely to receive their own planning grants, the Department's plans will put particular focus on areas of the state not receiving a planning grant to ensure that all municipalities, regardless of size, have an opportunity to implement projects identified in the climate action plan at later phases of the Climate Pollution Reduction Grants. The deliverables and elements in this workplan support EPA's Fiscal Year 2022-2026 Strategic Plan Goal 1 (Tackle the Climate Crisis); Objective 1.1 (Reduce Emissions that Cause Climate Change).

Previous work by the Missouri Commission on Global Climate Change and Ozone Depletion, namely the report titled *Missouri Action Options for Reducing Greenhouse Gas Emissions* (published July 2002), identified five sectors that would have the largest impact on reducing greenhouse gas emissions in the State. These sectors are: Electrical Generation; Building Energy Use, Transportation, Agriculture and Forestry; and Solid Waste Management. The climate action plans developed through this planning grant funding will focus at a minimum on these five known sectors, and may identify additional sectors or reorganize these sectors as necessary. The Priority Climate Action Plan will focus on the sector(s) that have the fewest barriers to implement projects, which may include cost to implement, both up-front installation cost and ongoing operational cost; the highest stakeholder buy-in, especially where emissions reduction projects will be undertaken on a voluntary basis; the greatest public interest in emissions reduction benefits; or where emissions reduction projects are most technically feasible.

The Department is committed to meaningful public and stakeholder engagement in the development of these plans. The Department plans to utilize existing outreach mechanisms such as those developed for the Volkswagen Trust and Diesel Emissions Reduction Act programs, and those which are used for public outreach and notification as required by the Clean Air Act and Missouri state statutes. The Department also plans to use existing relationships with regional air pollution planning agencies and groups who will have greater connection to localities across the State. The Department will also collaborate with other State agencies to ensure that all pertinent stakeholders are included in the plan development process.

RESPONSIBLE ENTITIES:

Lead Organization:

The Air Pollution Control Program within the Missouri Department of Natural Resources will serve as the lead organization for the Climate Pollution Reduction Grant program. Communications should be directed towards the contacts included in the Notice of Intent to Participate, in particular, as follows:

- Wesley Fitzgibbons (Wesley.fitzgibbons@dnr.mo.gov, 573-522-3222);
- Deedra Beye-Stegeman (Deedra.beye-stegeman@dnr.mo.gov, 573-751-8227), or
- Mark Leath (Mark.leath@dnr.mo.gov, 573-526-5503).

Mail communications can be addressed to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176.

Coordinating Entities:

The Department expects to coordinate with the following types of organizations in the plan development process:

- Other divisions within the Department, which may include the divisions of Energy, Geologic Survey, Administrative Support, and others;
- Other Departments within the State government, which may include the departments of Transportation, Agriculture, Conservation, Revenue, Office of Administration, Public Service Commission, and others;
- County and municipal governments, such as representatives of the metropolitan statistical areas identified in EPA's guidance document, namely, St. Louis, Kansas City, Springfield, Columbia, Joplin, Jefferson City, St. Joseph, Cape Girardeau, as well as others who may wish to participate but are not included in the guidance document;
- Regional Air Pollution Planning groups, such as the East-West Gateway Council of Governments, Mid-American Regional Council, Ozark Clean Air Alliance, Southeast Missouri Regional Planning Commission, Four-State Clean Air Alliance, and others.

Additionally, the Department may consider any of these organizations, as well as relevant research institutions, nonprofits, or contractors for sub-awards as appropriate and as allowed by state and federal grant requirements.

Subgrant Process:

The Department plans to implement subgrants to inform elements of the PCAP and CCAP, and to expand public outreach related the State's CPRG planning and implementation. For PCAP development, these subgrants will be limited to agencies and organizations defined as municipalities pursuant Clean Air Act Section 302, including cities, towns, boroughs, counties, parishes, districts, or other public bodies created by or pursuant to State law. Consistent with Clean Air Act section 137(d)(1), groups of municipalities, such as councils of government, are also considered eligible entities. Additionally, subgrant applicants must also meet all general eligibility criteria to receive federal funding. This definition may be expanded for CCAP development to include nonprofits, universities, and other applicants, pursuant to all relevant State and federal regulation.

For PCAP development, subgrants will focus on public outreach and education. Eligible and expected costs are those costs which are directly related to outreach and engagement meetings, which includes meetings conducted both inside and outside (evening or weekend) normal business hours. Such costs include but are not limited to staffing and contractual costs; planning and implementation of meetings, workshops, and convenings; advertisement of outreach meetings, evaluation and metrics-tracking activities, supplies (e.g. office supplies, software, printing, etc); incidental costs related to these activities; and other allowable activities necessary to the engagement meetings. Any costs for light refreshments or meals at outreach meetings will require prior approval by EPA, with inclusion of meeting details such as date, time, and location of meeting; and anticipated budget.

DELIVERABLES DEVELOPMENT PROCESS:

Key Deliverable #1: Priority Climate Action Plan:

PCAP Development Approach:

The Department will review sectors and barriers to implementation to help identify options for entities to apply for implementation funding. Key to the identification of the sector(s) and emissions reduction measures for this plan will be public and stakeholder outreach, in particular representatives of sources in all emitting sectors and representatives of low-income and disadvantaged communities which may benefit from emissions reductions projects. The Department plans to review and update as necessary previously developed state greenhouse gas inventories, as well as use existing EPA inventories and other national reports and inventories for inclusion in the PCAP. The Department will use existing expertise as well as expertise of stakeholders and collaborating organizations to identify and quantify emissions reductions measures for the identified sector(s), conduct a benefits analysis for low income and disadvantaged communities, and review the authority to implement identified measures by both the State and other collaborating entities.

As a starting point for development of the PCAP, the Department will review the existing 2002 *Missouri Action Options for Reducing Greenhouse Gas Emissions* and determine which areas of the report are still relevant for inclusion in the PCAP. The report includes numerous policy options, and estimations of possible benefits from those policies, many of which have not been fully implemented. The Department plans to engage with stakeholders and the public as early and often as possible, which may take the form of regular stakeholder workgroups. The Department plans to publish portions of the plan for public comment as appropriate, and will include additional recommended elements of a CCAP if time and resources allow. To the extent appropriate, the Department will consider plans developed by and for the St. Louis Metropolitan Statistical Area and Kansas City Metropolitan Statistical Area for inclusion or reference in the State's plan and coordinate activities with the lead agencies of these areas to avoid duplication of effort and to enhance the outcomes of all projects. The Department will retain final decision-making authority with regard to coordinating jurisdictions, contractors, subawardees, and consultation with the public.

PCAP Interagency and Intergovernmental Coordination:

The Department will utilize existing intergovernmental relationships developed for other funding programs, such as the Volkswagen Trust and Diesel Emissions Reduction Act, as well as those used for the purposes of the Clean Air Act, to ensure that municipal and county governments can collaborate and participate in the development of the PCAP. Additionally, the Department will utilize existing inter-departmental relationships such as those with the Division of Energy and Department of Transportation developed for planning activities related to the National Electric Vehicle Infrastructure program to broaden its reach for CPRG planning purposes. The Department will utilize file-sharing programs to facilitate coordination and development of required elements of the plan. Once final, the PCAP will be posted to the Department's website so that sub-state entities may use it to apply for funding to implement measures identified in the plan.

PCAP Public and Stakeholder Engagement:

The Department will utilize existing mechanisms for public outreach originally developed for funding programs, such as the Volkswagen Trust and Diesel Emissions Reduction Act, as well as those used for regulatory purposes. Additionally, the Department will utilize existing inter-departmental relationships to

broaden its public outreach efforts, such as through the Division of Energy's State Energy Planning resources and workgroups and through municipal subgrants to hold outreach and informational meetings for the public. The Department plans to use screening tools such as those developed for the Justice40 initiative, and tools and definitions developed by the US Department of Energy, US Department of Transportation, and others, to ensure that low-income and disadvantaged communities are involved in and aware of planning activities. The Department will endeavor to make full use of recorded informational webinars, virtual and in-person public meetings, and plain-English fact sheets posted online to ensure that these communities have many opportunities to engage with the planning process. The Department also plans to mobilize local partners such as municipalities, regional planning organizations, and elected officials to ensure inclusion of low-income and disadvantaged communities in the planning process. The Department plans to have an informal public comment period prior to final submission to EPA where the public can submit comments online for the Department's consideration.

Key Deliverable #2: Comprehensive Climate Action Plan:
CCAP Development Approach:

The Department will build off of the PCAP in developing the CCAP deliverable, with a similar goal of creating a menu of options for other entities to choose from when applying for Implementation funding and ensuring the broadest possible eligibility for sub-state entities and possible emissions reduction projects. The Department will collaborate with stakeholders and the public to expand the greenhouse gas emission inventory, quantified emissions reduction measures, and implementing authority to cover the full geographic scope of the State and all sectors contributing to greenhouse gas emissions. The Department will develop reasonable greenhouse gas reductions targets, as well as emissions projections for future scenarios including full plan implementation and no plan implementation, based on the quantified emissions reductions measures identified elsewhere in the plan. The Department will expand its low-income and disadvantaged community benefit analysis previously included in the PCAP to include benefits from reductions in all sectors contributing to greenhouse gas emissions. Additionally, the Department will include a benefit analysis for the full geographic scope covered by the plan. Throughout the planning process, particularly as it relates to the quantified emissions reductions and emissions projection scenarios, the Department will analyze how workforce labor or materials shortages will impact the plan, and work to cultivate solutions to ease or reverse these impacts. Additionally, the Department will analyze the intersectionality between measures included in the CCAP for implementation under the CPRG and other funding sources such as the Bipartisan Infrastructure Law's National Electric Vehicle Infrastructure program and Grants for Charging and Fueling Infrastructure, other Inflation Reduction Act programs such as the Greenhouse Gas Reduction Fund, Pollution Prevention grants, or programs targeting mobile sources such as medium and heavy-duty diesel vehicles.

CCAP Interagency and Intergovernmental Coordination:

The Department plans to continue and strengthen the intergovernmental relationships used in the development of PCAP for the development of CCAP. Existing relationships include those with sub-state entities used for other funding programs such as the Volkswagen Trust and Diesel Emissions Reduction Act, as well as those relationships used primarily for regulatory purposes such as the State Implementation Plan and other Clean Air Act requirements. The Department will make every effort use file-sharing and remote conferencing software to further facilitate these relationships and ensure other divisions, departments, and sub-state governmental entities are included in the development process. Once final, the CCAP will be posted to the Department's website so that sub-state entities may use it to apply for funding to implement measures identified in the plan. As with the PCAP, the Department will retain final decision-making authority with regard to coordinating jurisdictions, contractors, subawardees, and consultation with the public.

CCAP Public and Stakeholder Engagement:

The Department plans to continue strengthening the mechanisms used to develop the PCAP to coordinate with and engage stakeholders and the public. Existing mechanisms include those used for funding programs, such as the Volkswagen Trust and Diesel Emissions Reduction Act, as well as those used for regulatory purposes of public notice related to the State Implementation Plan and other Clean Air Act requirements. Additionally, the Department may consider municipal subgrants and subgrants to eligible nonprofits and universities for additional outreach capacity. The Department plans to continue using screening tools to identify low-income and disadvantaged communities, as described for the PCAP, to ensure meaningful engagement with these communities. The Department plans to continue using prerecorded informational webinars, virtual and in-person meetings, and plain-English fact sheets posted online to ensure that all members of the public have the opportunity to participate in plan development, as described for the PCAP. Similarly, the Department plans to have an informal public comment period prior to final submission to EPA where the public can submit comments online for the Department's consideration.

Key Deliverable #3: Status Report

Status Report Development Approach:

The Department plans to use relationships developed for the PCAP and CCAP to check on the status of implemented projects for inclusion in the Status Report. The Department will update benefits analysis, both for low-income and disadvantaged communities as well as the full coverage of the plan, and emissions reductions projections included in these plans based on the implementation status of the specific emissions reductions measures. The Department will review and update the authority to implement, as well as the workforce analysis included in CCAP, with a retrospective focus on what changes, if any, could have improved the implementation of the plans. The Department will synthesize all of these updates into a summary of the next steps available to the State, and what needs, if any, exist to continue review and update of the plans to further implementation of the specified emissions reductions measures.

Status Report Interagency and Intergovernmental Coordination:

The Department plans to continue the intergovernmental relationships used in the development of the PCAP and CCAP to obtain updates about implementation of emissions reductions measures included in the plans. Additionally, the Department expects collaboration with other government agencies and organizations to be key in the identification of the authority to implement emissions reduction measures, as well as in determining what the climate planning needs will be for the State past the end of the planning grant period.

Status Report Public and Stakeholder Engagement:

The Department plans to continue to coordinate with and engage the public, as described for the development of PCAP and CCAP, for the development of the Status Report. The Department expects coordination with the public, likely through virtual and in-person meetings to be key in determining what the next steps for the State will be at the end of the planning grant period.

ENVIRONMENTAL RESULTS, OUTPUTS, AND OUTCOMES:

The Department expects the main outputs of the planning grant to be the three deliverables, the PCAP, CCAP, and Status Report; as well as interim reports for public comment prior to the publishing of the final plans. Additional outputs include, at a minimum, the number of informational webinars, virtual and in-person meetings, public comment responses, and list-serve emails, press releases, and other public notices sent and conducted over the course of the planning process. The Department expects, at a minimum, to conduct, or coordinate with subawardees and/or contractors to conduct, five stakeholder meetings each for PCAP and CCAP development and to conduct at least one public comment period prior to finalizing each deliverable for submission to EPA. As detailed in the workplan budget, the Department expects for subawards to account for approximately 60 percent of the total award, but this percentage may need to be adjusted as the Department engages with and communities and identifies the scope of subawardee participation in the program. The Department will measure progress towards these goals and include reports and updates on this progress in the quarterly reports to EPA.

The Department expects the main outcomes of the PCAP and CCAP to be the quantified greenhouse gas emissions reductions implemented through the plans both for the full geographic scope of the plan as well as for low income and disadvantaged communities in particular; and the benefits to communities affected by the sources of these emissions, such as improved health and community engagement. Additional outcomes include, but are not limited to, reductions in co-pollutants that are not targeted specifically by the plan, enhanced community engagement and awareness of state planning activities, and various economic co-benefits related to the implementation of emissions reductions projects such as the creating of high-quality jobs and worker training and education. The Department will measure these outcomes and include reports, updates, and projections of them as appropriate in the quarterly reports to EPA.

SCHEDULE:

March 2023: State Submittal of Notice of Intent to Participate

April 2023: State Submittal of Workplan, Budget, and Grant Application

June 2023: Development of Informational Webinars, Intergovernmental and Stakeholder Meetings, additional as needed

July-August 2023: Development of GHG Emissions Inventory

July-September 2023: Identification and Selection of Sectors, Emissions Reduction Measures, Review of Authority to Implement, Quarterly Report to EPA

August-October 2023: Quantification of Emissions Reductions,

September-November 2023: Development of Benefits Analysis

November 2023: Review of Other Available Funding Sources

December 2023: Assemble PCAP for Intergovernmental Review, Quarterly Report to EPA

January-February 2024: Draft PCAP Published for Public Comment

March 2024: PCAP Finalized and Published, Quarterly Report to EPA

April 2024: Development of Informational Webinars, Intergovernmental and Stakeholder Meetings, additional as needed

April-June 2024: Expansion of GHG Emissions Inventory

May-June 2024: Expansion of Emissions Reduction Measures

June-August 2024: Quantification of Emissions Reduction Measures, Workforce Analysis and Strategy, Quarterly Report to EPA

July-September 2024: Emissions Projection Scenarios, Emissions Reduction Targets, Community Benefits Analysis, Quarterly Report to EPA

November 2024: Update to Review of Authority to Implement, Other Available Funding Sources

December 2024: Finalize CCAP, with Intergovernmental Review, Quarterly Report to EPA

January-February 2025: Publish CCAP for Public Comment

March 2025: CCAP Finalized and Published, Quarterly Report to EPA

Summer 2025: Public and Stakeholder Implementation Update

Fall 2025 - Summer 2026: Update of CCAP Outcomes Based on Implementation, Quarterly Reports to EPA

Winter 2026: Public Status Report Meetings, Determination of Next Steps, Quarterly Report to EPA

Spring 2027: Publish Status Report, Final Report to EPA

The Department plans to submit Quarterly reports no later than two weeks after June 30, September 30, December 31, and March 31 of each year during the project period. Though this tentative schedule includes some uncertainty towards the end of the project period, the Department will not exceed the period of performance of four years after the date of award.

REPORTING:

The Department plans to submit quarterly reports as described in Section 12.6 of the program guidance, and has included such reporting in the Schedule above.

CLIMATE INNOVATION TEAMS (OPTIONAL):

The Department is interested in participating, subject to availability of budget and staff resources, in Climate Innovation Teams. The Department is particularly interested in technical assistance opportunities and subject matter expertise related to emissions reduction measures and workforce development, as well as national and local coordination with other jurisdictions, and information about leveraging other support and funding to increase the impact of the planning grant award and other federal funding.

BUDGET: