

Monday December 5, 2022

**Geos Institute's Comments to the EPA
in Response to the GHG Reduction Fund RFI
(Docket: EPA-HQ-OA-2022-0859)**

*These comments are submitted by the Geos Institute
with the support of 70 individuals and organizations (see list of names at the end)*

The recent federal investments in climate change through the Inflation Reduction Act are critically important if we are to meet our climate targets. However, these investments will be effective only to the extent that they are deployed to the places where they are most needed and leveraged for additional long-term, systemic benefit.

It is clear from the questions in this RFI that the EPA understands the need to invest this funding in ways that create long-lasting change, leverage other programming and resources, and build capacity for future investments, particularly as they relate to helping low-income and disadvantaged communities in support of the Justice40 initiative of the Biden Administration.

A recent analysis by the National Oceanic and Atmospheric Administration (NOAA) found that there are over 250 federal programs currently working to address climate change. Each is operating independently and trying to identify and reach their target communities, make the best investments possible, and monitor the impacts of those investments.

At the same time, communities find themselves in an increasingly difficult position. Widespread climate impacts, such as increased flooding, extreme heat, severe storms, wildfire, and sea level rise, are straining local governments, reducing their capacity to engage in the long-term efforts needed to transform our relationship with energy in this country. Federal programs are competing for the attention of these local governments while their capacity to engage is diminishing.

Several other federal analyses have identified the need for a networked system of climate support services to help deploy federal resources, tools, and funding. The 2022 National Advisory Council's recommendations of the Federal Emergency Management Agency (FEMA) call for FEMA to work with other agencies in creating a whole of government approach to their climate resilience goals that includes adaptation, mitigation, and social equity. The White House Office of Science and Technology Policy is engaged in a climate services fast-track committee process to develop guidance for a nationwide system of climate services for local communities. Recently representatives from climate service programs at the Environmental Protection Agency (EPA), FEMA, NOAA, the U.S. Department of Agriculture (USDA), the National Extension Climate Initiative (NECI), and the National Institute of Standards and Technology (NIST) met to

discuss challenges with deploying current federal investments and ensuring that they are effectively invested where they are needed most. There was general agreement that a civic infrastructure system that served all federal agencies would help them deploy resources, tools, data, and funding better than their current, siloed system.

A systemic solution is required to make the best use of this once in a generation funding and to fully meet the needs of local communities as they grapple with escalating demands for emergency services and other essential services while also working to address climate change. A whole-of-society approach that includes government and civic organizations is needed. EPA can leverage this current opportunity by taking a leadership role in setting our nation's communities up for success by helping them do their part to address the climate crisis.

With this funding, EPA can develop the civic infrastructure necessary to effectively invest these Greenhouse Gas Reduction Fund resources and help other federal climate programs and investments get to the ground in communities where they are needed most. This civic infrastructure will create the long-term capacity necessary to help the 19,000 local government jurisdictions in the United States do their part to address the climate crisis on a timeline that makes sense with the call from the International Panel on Climate Change to reduce greenhouse gas emissions by 45% by 2030. With just a small percentage of this funding, EPA can create the basics of an infrastructure that will make the best use of the current investments and support that infrastructure for 5 years after it is fully in place.

General Recommendation

We recommend that the EPA invests 5% (\$1.35 billion) of the \$27 billion investment in a civic infrastructure system made up of climate services boundary organizations that will deliver the EPA's Greenhouse Gas Reduction Fund program to states, territories, Tribal nations, and Alaska Native villages. Some amount of additional project funding from this federal investment would be deployed through this system with other resources reserved by the EPA for direct funding of larger regional and/or multi-state projects.

This civic infrastructure system will need to be built by external partners who will then connect that system seamlessly to the Greenhouse Gas Reduction Fund program, EPA's other climate programs, and programs of other federal agencies, state agencies, academic institutions, and nonprofit organizations that can assist local governments in their climate mitigation efforts. An integrated system like this will make it much easier for communities to move quickly from thinking about addressing climate change to taking effective action at scale to help our nation meet its climate goals – regardless of their location, size, or wealth. Over time, this system, initially built by the EPA to deploy Greenhouse Gas Reduction Fund resources, could:

- leverage investments in both climate mitigation and resilience,
- streamline efforts to reach and support low-income and disadvantaged communities,
- innovate and share solutions across a nationwide network,
- provide local governments with one-stop-shops for climate assistance, and

- monitor and report on a wide array of metrics to understand the impact of these investments from both climate and social equity perspectives.

We recommend that the EPA fund the development of a nationwide civic infrastructure system to help deploy Greenhouse Gas Reduction Fund resources that includes the following characteristics:

Structure

- Has independent, but networked, climate service centers (Centers) in all fifty states. These Centers will provide public education and engagement programming to help communities and businesses understand the need to reduce greenhouse gas emissions and the resources available to help them with a focus on low-income and disadvantaged communities, provide technical support to climate mitigation project planning efforts, and deploy project funding. Within this structure, the needs of U.S. territories, Tribal nations, and Alaska Native villages should be met in ways that meet their greenhouse gas reduction needs as they see them – possibly with their own Centers. The pathways for creating these Centers should be flexible to ensure that the most effective structure is put in place in each state to leverage good work already on the ground and ensure that the host organization is trusted by community leaders. This means that some Centers may be hosted by state governments, while others may be hosted by nonprofit, academic, Tribal, or other governmental entities.
- Centers the needs of low-income and disadvantaged communities so that the investments create long-term improvements in their lives and capacity to develop additional future improvements. This includes providing leadership opportunities for community leaders from low-income and disadvantaged communities.
- Includes a regional support structure that assists the Centers with technical assistance and connects them to funding sources initially through the Greenhouse Gas Reduction Fund but expanding to other funding sources and federal programs over time.

Leverage

- Builds on and strengthens the greenhouse gas reduction services that are already available in states, territories, Tribal nations, and Alaska Native villages.
- Leverages additional funding and resource investments over time from other federal, state, and academic programs as well as philanthropic sources.
- Leverages the technical assistance capacity of academic programs, service programs (AmeriCorps, etc.), and the USDA Extension Service.

Innovation

- Supports innovative solutions to address current systemic barriers to zero emission technology deployment. The system has a means of sharing widely innovations that prove effective.
- Networks communities within each Center, states with other states in regional support groups, and regions with one another to identify and address system-wide challenges.
- Measures results across the system to understand and strengthen the impact of investments on greenhouse gas emissions reduction targets and social equity goals.
- Partners with EPA and other federal, state, and academic institutions to identify and develop solutions to emerging needs in communities that must be addressed for them to take the next steps in reducing greenhouse gas emissions.
- Identifies training needs and partners with academic institutions and other providers to ensure a competent climate workforce ready to fill the family wage positions that will be created by the larger Greenhouse Gas Reduction Fund investments.

Management

- Is developed by an external collaboration of climate service providers, organizational development experts, and network specialists who incorporate best practices into the system. This collaboration will build the system in a way that balances the need for some amount of standardization across the system with the flexibility needed to ensure that each Center meets the communities within its jurisdiction where they are in terms of reducing their greenhouse gas emissions.
- Has a viable plan to build all Centers within three years of the funding being made available to the recipient, with each Center funded for an additional five years through this initial investment.
- Employs an organizational management structure that can effectively lift a system of this size, while ensuring accountability and keeping authority and decision-making as close to the ground as possible. This will ensure that the greenhouse gas emissions reduction needs in local communities are understood and addressed effectively.
- Is responsible for distributing some additional Greenhouse Gas Reduction Fund funding directly to communities and projects through the Centers using block grant mechanisms and revolving loan funds.

A benefit of funding this civic infrastructure system first is that some of the decisions made regarding how to ensure accountability and compliance with the projects funded through this system could be integrated into future grant programs that EPA will use to deploy the remaining funding in the program.

The following comments build on this structure but speak to specific questions from the RFI. Note that all comments below are intended to address funding used to develop this civic infrastructure system and additional funding disbursed through this system. We recognize that not all of the \$27 billion would be distributed through this system, so comments may or may

not be applicable to project funding disbursed directly by EPA for larger regional and cross-state projects.

Section 1, Question 1

An effort is underway in the federal government to define and map Justice40 communities. EPA should incorporate that definition and map into this process. It is imperative that programs across the federal system that aim to assist Justice40 communities employ the same definitions of low-income and disadvantaged communities.

Section 1, Question 2

One of the best ways to reduce greenhouse gas emissions is to improve the energy efficiency of homes and businesses. This is particularly helpful for low-income and disadvantaged communities because weatherization programs reduce utility costs and create family wage jobs. Since many low-income people reside in rental housing, it is important to have programming that helps rental property owners weatherize their units and integrate renewable energy in ways that address the split incentive problem. Zero or low interest loans or loan/grant combinations to weatherize homes should be considered effective strategies and could be easily deployed by the Centers identified above.

Section 1, Question 3

Business owners can benefit from similar programs as in Question 2 above, but efforts must be funded to engage small business owners and/or managers who may not be well-connected to the larger business community. How the outreach happens should be flexible enough to be customized to the area and take advantage of existing formal and informal business networks. As with Question 2, this task could be easily managed by the Centers.

Section 2, Question 1

The program should be structured such that not only are there criteria for investment that require leveraging private sector investments, but there is also assistance in developing projects that meet the criteria. Otherwise, the investments will not reach the communities that do not have the knowledge or capacity to develop the projects. Investments in helping develop projects should be focused on low-income and disadvantaged communities. This assistance could be made readily available through Centers.

Section 2, Question 2

Our recommendation for this question is similar to the one before it. Both requiring private sector investment and requiring that these investments facilitate additionality can be designed into the program, particularly if resources are made available to help interested communities and businesses develop projects. An additional benefit is that some of these projects will be

determined to not need additional federal investment. In those cases, the Greenhouse Gas Reduction Fund will support the development and implementation of more projects than it funds itself, while ensuring that the projects it does fund require the investment to be viable. Centers could include trained staff whose job it is to engage low-income and disadvantaged communities and assist them and others in the development of viable greenhouse gas reduction projects.

Section 2, Question 3

Recycling revenue is a critical element in the effort to successfully transform our relationship with energy in this country. Providing additional funding to each of the Centers described above to have a revolving loan fund is a powerful way to accomplish this. Revolving loan funds would allow the Centers to develop customized support for each project that includes as much low or no-interest loans as possible while closing the gap with grant funds. Repayments from those loans would then be available to fund future projects.

Section 2, Question 4

Funding through this program creates a fantastic opportunity to support innovation, particularly in financing greenhouse gas reduction efforts. EPA can encourage this innovation by providing specific additional funding to the Centers designed to test, monitor, and share innovative financing mechanisms to facilitate broad private market capital formation. When these mechanisms are shown to work within the constraints of the existing private market, the market itself will then generate additional projects, which will leverage this Greenhouse Gas Reduction Fund investment. Because it is an integrated network, the system of Centers will be a highly effective partner in developing these innovative projects and sharing information with local and regional financial institutions about financing mechanisms that can work with no or little government investment.

Section 2, Question 5

EPA should pass project specific funding through this system of Centers for projects within each Center's jurisdiction so that the Centers are granting the funding and are responsible for the effectiveness of the investments. It is exceedingly difficult for communities and businesses to secure funding directly from the EPA or other federal programs, and understandably so given the distance between the federal government and local communities. By employing a block grant mechanism with some amount of the project funding available through the Greenhouse Gas Reduction Fund, EPA could get the decision-making about which projects to support closer to the ground. By relying more on local knowledge about communities and their capacity, the Centers could develop less onerous application processes and provide direct project development support, particularly for low-income and disadvantaged communities. EPA would keep a certain amount of funding for larger scale, multi-state projects that it funds directly, but those projects can manage the administrative burden of applying directly to the EPA. For those projects, a standard Benefit-Cost Analysis process across all federal agencies that considers

longer-scale benefits of nature-based solutions would be helpful. This has also been called for by FEMA's National Advisory Council.

Section 2, Question 6

As mentioned above, providing additional funding in the form of revolving loan funds and block grants would help immensely. In addition, EPA should create a grant contract with a single entity that will build the system of Centers and regional support programs. That entity should be a collaboration of climate service providers who have a deep understanding of how to deliver greenhouse gas reduction programs, manage large budgets, and develop and support a system that will grow and become stronger over time through positive feedback loops that draw investment and other forms of support.

Within that contract, EPA should stipulate that it will be involved with the partner in the ongoing strategic planning and implementation of the system. By requiring that the contract recipient include EPA in these activities, EPA can be intimately involved with the development of the system while allowing the partner the broad discretion it needs to determine the best way to do the work given that it will have more flexibility than federal agencies do. The EPA should avoid the cooperative agreement structure as it is likely to hamper the civic partner in its effort to employ that broad array of options.

While the EPA should employ a competitive process to identify the civic partner and award the funding to develop the civic infrastructure system, it should not require that partner to follow a standard competitive process to select the organizations that will lead and host the Centers. Requiring a competitive process at that level will damage the collaborative nature of the work and harm the ability of the civic partner to help develop Centers that are led by collaborations of existing service providers in each state or jurisdiction. Rather, the civic partner should be tasked with helping the existing climate service providers in each state come together in a collaborative effort that strengthens existing programs and helps fill in the gaps needed to serve local communities and businesses.

Section 2, Question 7

The Centers described above should be able to share lists of qualified firms and individuals who can help communities and businesses develop and implement projects within the state or jurisdiction, but it will be critically important that they follow best practices and require consistent certification prior to including a firm or individual on any such list. Since growing the climate workforce is necessary to implement this project, it is important that the Centers provide credible information about who is qualified to help and in what content areas.

Section 2, Question 8

It should be required that the civic partner developing the Centers creates a uniform process that will be followed across all Centers to collect the appropriate data necessary to ensure that

investments comply with Title VI of the Civil Rights Act. Data collection will be a standard element of the system, made simpler by the fact that data will be collected on a variety of issues by each Center and aggregated at the regional and federal level for different purposes.

Section 2, Question 9

It should be required that the entity developing the Centers creates a uniform process that will be followed across all Centers to collect the appropriate data necessary to ensure that investments comply with the Build America, Buy America Act. Data collection will be a standard element of the system, made simpler by the fact that data will be collected on a variety of issues by each Center and aggregated at the regional and federal level for different purposes.

Section 2, Question 10

There are several programs that could complement the Greenhouse Gas Reduction Fund, particularly if EPA invests in a civic infrastructure system, as mentioned above, to help deploy climate investments across the nation. The Bipartisan Infrastructure Law (BIL) is a good example of a resource that could strengthen the EPA's investment, while in turn being strengthened by the EPA's investment. Centers could tap BIL funding to help build capacity of local communities to request funding for high priority projects that build climate resilience. Department of Energy state level programs that help communities reduce greenhouse gas emissions could be leveraged by this system. The regional centers funded through EPA's Environmental Justice Thriving Communities Technical Assistance Centers Program could coordinate with the Centers in this civic infrastructure system through its regional support structure to get their offerings delivered closer to the ground.

These Centers can eventually be used to help communities build climate resilience, which is particularly helpful for local governments as local leaders do not distinguish between climate mitigation and climate adaptation/resilience in the same way the people in the respective climate fields and federal agencies do. EPA could leverage its Adaptation Resource Center (ARC-X) through these Centers. NOAA's Climate Smart Communities Program could have a synergistic relationship with this program through the Centers, as could FEMA's Building Resilience Infrastructure and Communities program. The Bureau of Indian Affairs' Branch of Tribal Climate Resilience offers climate resilience programming and support to Tribal nations and Alaska Native villages that could also be supported and leveraged through the efforts developed to serve these entities. The Department of Housing and Urban Development has several programs underway to help communities build climate resilience and more are planned through its 2021 Climate Action Plan. Those efforts could benefit from the development of this system of Centers.

In addition, regional climate science and service programs, such as the USDA Climate Hubs, NOAA's Climate Adaptation Partnerships/Regional Integrated Sciences and Assessments Program (CAP/RISAs), and the US Geological Service's Climate Adaptation Science Centers (CASCs) would all benefit from this structure being in place to help deploy their programs.

Through the Extension Foundation, the Extension Service is actively planning its climate service efforts. With a staff of 30,000, the Extension Service represents incredible capacity to leverage the strong local relationships developed by extension agents nationwide to foster local climate action. Their efforts will be much more effective if they can collaborate in-state with Centers across the nation.

It is likely that this civic infrastructure system will align well with the guidance that will soon be generated by the White House Office of Science and Technology Policy's fast-track climate services committee process as there is general agreement that this system is needed across the climate services field. By developing the civic infrastructure needed to effectively deploy Greenhouse Gas Reduction Fund resources, EPA will take a leadership role in creating the whole of society approach needed, and being called for across the federal family, to meet our nation's climate goals. This is an opportunity to be bold and make a long-term investment in helping US communities take action at the scale of the climate challenge.

Section 2, Question 11

It is necessary to address Tribal and territorial governments through the civic infrastructure system and its Centers as identified by leaders in those governments. In addition to the fifty states, efforts to reduce greenhouse gas emissions are already underway across Tribal nations, Alaska Native villages, and territorial governments. Each has positive, homegrown programs that should be strengthened by this system. To accomplish this, it is critical that there be leadership opportunities throughout the civic infrastructure system, and within the collaboration that will build it, for leaders from these governments. This will ensure, as it will in the fifty states, that the support offered through this system is aligned with the needs of the communities it is intended to serve.

Section 3, Question 1

The EPA should fund the development of the full civic infrastructure system, including the Centers, regional support structure, and national system leadership through the indirect investment provisions of the Greenhouse Gas Reduction Fund. It should move some amount of the direct funding through these Centers while reserving some funding to be allocated directly by EPA for larger regional and cross-state projects.

Within the Centers, funding should be focused on ways that primarily address greenhouse gas reduction, but priority should be given to projects that bring additional benefits, such as being located in low-income or disadvantaged areas, reducing ongoing costs for residents in such areas, creating emergency power resilience for essential services in the community, bringing climate resilience benefits, and/or providing family wage jobs in areas that need economic development assistance. Supporting projects that provide multiple benefits will strengthen local buy in for future greenhouse gas reduction projects.

Providing support to help in the development of viable projects will help ensure strong projects are created with the least federal grant funding necessary, stretching the value of the Greenhouse Gas Reduction Fund much farther than if it is simply focused on implementing projects brought forward by those who have the capacity to ask for and manage the grant funding.

Section 3, Question 2

The two primary ways that funding can move through to projects is by subgrants and loans as identified in the RFI. Subgrants should be offered to provide planning capacity alongside technical planning assistance to low-income and disadvantaged communities. By being involved in the project development process, the Centers can help the project proponents tap other funding sources for project funding, maximize the use of loans within the boundaries of project viability, and reserve grant funding for those situations where a true gap remains after standard market financing and government loans are employed in the financial plan of a project.

Section 3, Question 3

Capacity to develop projects is a significant hurdle, particularly in low-income and disadvantaged communities. The communities that have shelf ready projects right now are those communities that can afford to do that future planning within their current budgets. Small planning subgrants to project proponents and technical assistance to help develop their projects must be included in this process, or funding will simply flow to more affluent communities, and it will be difficult to ascertain whether the funding being requested is necessary to fill a financial gap that is preventing project viability. It will also be critical to fund the effort to reach out and engage these low-capacity communities rather than expecting them to learn about the program on their own and step forward to take advantage of its resources. The Centers will be well-positioned to provide both capacity building subgrants and the technical assistance necessary to make the most of Greenhouse Gas Reduction Fund investments.

Section 4, Question 1

It is important that the Greenhouse Gas Reduction Fund program be able to partner directly with one entity and that entity be a collaboration of leaders in the climate mitigation field, organizational development experts, and networking specialists. This mix of partners will ensure that best practices for climate mitigation are followed consistently across the nation, the system is able to be lifted quickly, the investment builds a foundation for long-term success, and effective and ineffective innovation efforts are able to be shared. This will allow climate mitigation efforts to evolve at scale and in the timeline necessary to meet our nation's climate targets. It is also critical that the Centers be governed by collaborations of entities that are providing climate support services in each state or jurisdiction. To this end, funding must come through a single civic entity to ensure that the Centers and regional support structures are developed following a consistent framework, social equity is integrated across all levels, and

systems are put in place to ensure compliance with all federal laws and regulations regarding disbursement of federal funding.

Section 4, Question 2

To ensure that effective investments are made in low-income and disadvantaged communities, decisions about those investments must be made as close to the ground as possible. While there should be just one recipient for the funding to build the civic infrastructure system and subgrant funding to the various entities, the structure of the system should require that there be representation by leaders of low-income and disadvantaged communities at the Center, regional, and national levels who are compensated fairly for their time.

Section 4, Question 3

As mentioned above, the best way to accomplish this is to create an infrastructure that can deploy subgrants and technical support to build the capacity needed to develop viable, high priority projects in communities across the country. This is particularly important in communities where such capacity does not already exist. One of the ways to do this is to provide subgrants and technical support through a cohort process so that project proponents can learn critical elements of project development together, creating a lateral support network and making the most effective use of technical support resources. Those who successfully develop viable projects could then serve as mentors for the next cohort of communities. The Centers will be well-positioned to deploy the subgrants and technical support and coordinate the education and support efforts for cohorts. They should be prepared to provide more intensive support for communities with little current capacity to develop the types of projects the Greenhouse Gas Reduction Fund aims to support.

Section 4, Question 4

This is a particularly important question because it is critically important that we make the most effective use of this once in a generation investment as possible. The best way to ensure the responsible implementation of the Greenhouse Gas Reduction Fund investments in new entities without a track record is to place accountability with the entity that develops the civic infrastructure system. That entity will be made up of people and organizations that do have track records, thus protecting the federal investment. This infrastructure should mentor and support new entities that are funded through this program to build local capacity to develop, fund, and implement greenhouse gas reduction projects. By offering this guidance, the system will ensure effective investment of the funding entrusted to its care through both indirect and direct support elements of the Greenhouse Gas Reduction Fund.

Section 4, Question 5

Financial assistance in the form of subgrants to project proponents for planning, financing, and implementing projects is critical to the long-term success of these investments. It will also build

capacity, particularly in low-income and disadvantaged communities, to create future projects with less assistance. At the same time, being able to bring in funding through a revolving loan fund to reduce the amount of grant funding needed by a project is especially important to get the most out of the Greenhouse Gas Reduction Fund investments. Including technical support for efforts to secure outside funding through the private financial markets and other government programs will also maximize the effectiveness of these investments. This system's overall goal should be to leverage the Greenhouse Gas Reduction Funding so that more than a dollar of greenhouse gas reduction benefit is created for each dollar invested. The Centers will be very well-positioned to provide the technical support needed to make this happen.

Section 5, Question 1

It is important to ensure financial accountability to taxpayers for all the funding, both indirect and direct, deployed through the Greenhouse Gas Reduction Fund. Having a single civic partner responsible for deploying the Fund's resources that would move through this civic infrastructure would simplify the accountability structure significantly. It will also make it easier for low-income and disadvantaged communities to access funding because it is difficult for these communities to navigate federal accountability requirements, assuming they can manage the proposal process. By working with new and existing community-based partners at the local level, the Centers can gather the accountability information needed from them and aggregate it into a single annual reporting to the EPA. Transparency throughout the system is key and the civic partner that develops the system must be able to provide the aggregate information and show where that data originated so that external auditors and the public can verify the accuracy of the information. By creating a collaborative structure through the contracting process, EPA can provide guidance about how that system-wide accountability effort needs to be managed to meet federal requirements. Having this civic infrastructure system in place allows EPA to ensure accountability in a way that will be nearly impossible if EPA is trying to help community groups across the country navigate federal accountability reporting for potentially thousands of grants.

Section 5, Question 2

In addition to compliance requirements required by federal statutes or regulations, EPA should require that the entity developing this civic infrastructure report annually on:

- the effectiveness of greenhouse gas reduction projects,
- how those investments are focused and how many people benefit in terms of low-income and disadvantaged communities,
- how those investments create additional private sector investments and project additionality,
- how those investments are leveraged through loan mechanisms and technical support to ensure the most effective use of grant funding,
- leadership opportunities provided for and taken up by leaders of low-income and disadvantaged communities, Tribal nations, Alaska Native villages, and territories,

- the effectiveness of capacity building efforts in low-capacity communities,
- how many additional projects are developed independently of this funding due to effective capacity building efforts,
- the build out of the system of Centers, regional support structures, and both vertical and horizontal networking structures,
- the effectiveness of the system's ability to identify and address obstacles to implementation through partnerships, and
- the system's ability to secure additional financial and technical support from other sources.

Section 5, Question 3

In terms of the questions regarding metrics for low-income and disadvantaged communities, it is important that the EPA follow the mapping and definition of Justice40 communities currently underway at the federal level. Frameworks for tracking and measuring the remaining outcomes should be developed for the civic infrastructure with the entity chosen to develop the system and its collaborators. This should be one of the tasks completed collaboratively with the EPA after funding to create the civic infrastructure system is awarded through this program.

Section 5, Question 4

The civic partner selected to develop this civic infrastructure system should be required to work with its collaborators and the EPA to ensure community accountability. If the first funding from this program is focused on this civic infrastructure system, some of the structural decisions made in this effort, like this one, could be integrated into the funding requirements for the direct award grants that the EPA retains to focus on larger regional and cross-state efforts.

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