

Climate Pollution Reduction Grants – Planning Grants Tennessee Workplan

WORKPLAN SUMMARY:

The Tennessee Department of Environment and Conservation (TDEC) is pleased to submit this workplan for EPA’s Climate Pollution Reduction Planning Grant (CPRG) to develop a climate plan for the State of Tennessee. The grant project period will begin upon receipt of an award from EPA from xx/xx/2023 to xx/xx/2027, a four-year period. The geographic extent of the plan is the state of Tennessee. As a part of this grant, TDEC will develop a Quality Assurance Performance Plan (QAPP), statewide GHG (Greenhouse Gas) inventory, a Priority Climate Action Plan (PCAP), a Comprehensive Climate Action Plan (CCAP), and a Status Report. Existing plans and strategies include those developed by the cities of Knoxville, Chattanooga, Memphis, and Nashville. Knoxville, Nashville and Memphis have developed GHG emission inventories; Chattanooga has not. Based on review of existing inventory information, preliminary indications are that three sectors: transportation, electric power generation, and industry represent 78% of statewide GHG emissions and may be prioritized in the PCAP. The CCAP will be developed building off of the PCAP.

To guide the development and adoption of deliverables for this grant, TDEC will form a diverse, multidisciplinary advisory committee, tentatively called the Climate Resilience and Pollution Reduction Advisory Committee (CRPRAC), with representation from stakeholder groups with a vested interest in the climate planning grant. The goal of this committee is to serve as the primary advisory entity to TDEC and our contractors throughout the planning grant lifecycle. The advisory group will support the identification of priority GHG reduction measures for inclusion in the PCAP and CCAP, promote participation in the subsequent implementation grant phase, ensure responsible and transparent use of planning funds, and track progress, outputs, and outcomes associated with the planning grant. The CRPRAC will also broaden our ability to undertake robust stakeholder and public engagement by leveraging the networks of those included in the CRPRAC. The CRPRAC will also assist in completion of the of Status Report.

TDEC will actively engage the public and key stakeholders throughout the grant period. This will be achieved through a combination of in-person and virtual events. TDEC proposes a minimum of eight stakeholder events across the state in years 1, 2 and 3 of the grant period –with one held in each large metropolitan area (Knoxville, Chattanooga, Nashville, and Memphis) and one held in mid-sized areas (Johnson City/Kingsport, Cookeville/Crossville; Clarksville, and Jackson). These locations target the large and mid-size cities across the state and also capture geographic diversity, with locations in West, Middle, and East Tennessee. Decisions for additional locations and events will be based on analysis conducted using federal screening tools to ensure disadvantaged communities can access and attend these events, with up to four additional locations selected for years 1 and 2 of the grant and up to two additional locations selected for year 3 of the grant. In year 4 of the grant period, in-person engagement events will be planned, if necessary and as budget and timing allows, to gather feedback for developing the Status Report.

RESPONSIBLE ENTITIES:

Lead Organization: The Tennessee Department of Environment and Conservation (“TDEC”) will serve as the lead contact for this grant. As indicated in TDEC’s Notice of Intent to Participate, the primary and additional contact is as follows:

Primary Contact: Michelle Walker Owenby
Division of Air Pollution Control
michelle.b.walker@tn.gov
615-426-9250

Additional Contact: Mary-Margaret Chandler
Division of Air Pollution Control
mary-margaret.chandler@tn.gov
615-532-6813

Coordinating Entities:

TDEC will coordinate with various entities to ensure completion of deliverables associated with the Climate Pollution Reduction Planning Grant. Below is a list of currently anticipated key entities that will either assist in the deliverable development process or provide data necessary to produce deliverables. As deliverables are being developed, other yet-to-be identified entities may also assist TDEC. To the extent TDEC was able to obtain a letter of commitment from the entity, it is included with the grant application. Regardless of whether a letter of commitment was obtained, TDEC anticipates being able to coordinate successfully with each of the entities listed to obtain assistance or data.

TDEC entities: Division of Air Pollution Control; Office of Policy and Planning, State Energy Office, Division of Stakeholder Engagement; Office of General Counsel; Small Business Environmental Assistance Program.

Other State/Federal entities: Tennessee Valley Authority; Tennessee Department of Transportation; Tennessee Department of Health, Tennessee Housing Development Agency; Labor and Workforce Development and other state agencies as applicable.

MSA entities: Lead organizations for the Memphis, Nashville and Knoxville MSA areas and any other Tennessee MSA areas that are identified under EPA's CPRG planning grant as funding recipients; City of Knoxville and Knox County: City of Chattanooga and Hamilton County, City of Memphis and Shelby County, Metropolitan Government of Nashville and Davidson County, and Greater Nashville Regional Council

Other air agency entities: Local air programs for Knox County, Chattanooga/Hamilton County, Metro Nashville/Davidson County and Shelby County.

Other entities: TDEC anticipates utilizing a contractor to perform work necessary to complete deliverables associated with this grant.

DELIVERABLES DEVELOPMENT PROCESS:

TDEC, as the lead organization, will have primary responsibility for ensuring each required deliverable is developed in timely fashion and provided to the EPA by the deadlines in the program guidance. TDEC's Division of Air Pollution Control will functionally manage the grant, including performing all submissions, reporting and correspondence with EPA. TDEC's Division of Air Pollution Control will contract with a consultant to develop most of the required deliverables. The consultant will develop Tennessee's statewide GHG inventory for the PCAP, CCAP and the status report (if needed). Upon completion of the grant term, the Division of Air Pollution Control intends to assume control and responsibility for the statewide GHG inventory, including its maintenance and periodic updating as long as EPA's State Inventory Tool (SIT) remains supported by EPA as a freely accessible tool for Tennessee and the Division's staffing and resources are available to do so. The consultant will also have primary responsibility for conducting the following elements for each deliverable: PCAP- quantified GHG reduction measures (priority) and benefits analysis including for low income/disadvantaged communities; CCAP- GHG emissions projections, GHG reduction targets, quantified GHG reduction measures; benefits analysis including for low income/disadvantaged communities and workforce planning analysis. The consultant will develop both the PCAP and CCAP documents.

TDEC will retain primary responsibility for conducting interagency/intergovernmental coordination and public and stakeholder engagement, review of authority, and intersection of other funding availability for the PCAP, CCAP and status report. TDEC will form a diverse, multidisciplinary advisory committee, tentatively called the Climate Resilience and Pollution Reduction Advisory Committee (CRPRAC), with representation from stakeholder groups with a vested interest in the climate planning grant. Additional detail about the Committee and interagency/intergovernmental coordination is included in specific deliverable discussions below. TDEC's Division of Stakeholder Engagement will lead

the public engagement effort and will be supported by all TDEC entities as well as the consultant . Details regarding TDEC’s planned stakeholder engagement is included in specific deliverable discussions below.

TDEC will retain primary responsibility for the status update but will continue to work with the consultant to the extent funding allows. The schedule with milestones for developing each deliverable is discussed in the section titled Schedule. Decisions as to key elements within each of the deliverables will be made utilizing a consensus-based approach, with all TDEC entities and State leadership, including the Commissioner of TDEC and the Governor, as primary parties in those decision-making discussions. TDEC is committed to developing a plan that reflects the needs, both current and future, of Tennessee and will endeavor, to the greatest extent possible, to develop a plan that is inclusive of the feedback that is provided by all coordinating entities, the public, and all other interested stakeholders who engage with TDEC during the grant period. TDEC will work to ensure that current climate plans as well as those being developed under EPA’s CPRG program work in harmony with the state plan.

The state of Tennessee does not currently have a climate action plan; however, TDEC is aware that Nashville, Memphis and Chattanooga, and Knoxville have developed such plans or strategies. To the maximum extent possible, TDEC will work to ensure the state plan does not conflict with any existing climate plan or strategy for a jurisdiction within the state and will endeavor to align the state plan to support both current plans and those being developed under EPA’s CPRG program. TDEC and the coordinating entities will also endeavor to produce a statewide GHG inventory that recognizes the inventories that have already been developed in specific jurisdictions in Tennessee, to the greatest extent possible. TDEC expects the CCAP will build from the PCAP, with the inclusion of appropriate or relevant sectors as well as broader geographic scope.

Key Deliverable #1: Priority Climate Action Plan:

PCAP Development Approach:

TDEC and coordinating entities will complete all activities required to finalize and submit the PCAP by March 1, 2024. The discussion below details the approach that will be taken for each element of the PCAP. The schedule for the development of the elements is included in the section titled Schedule. Tennessee does not have a climate action plan, but TDEC will work to ensure the PCAP harmonizes with the existing climate plans for cities that have developed a plan or strategy (Memphis/Shelby County, Chattanooga, Knoxville and Nashville).

- *GHG Inventory*

Initiate activities to develop a GHG Inventory using a hybrid approach that will combine EPA’s existing National Inventory summaries (currently available through CY 2020) with use of default inputs to EPA’s State Inventory Tool (SIT) modules, as applicable. This process will enable the team to assess data needs for the comprehensive GHG inventory. During this phase, strategies to assess and integrate existing metropolitan GHG inventory inputs and/or outputs will also be evaluated.

- *Quantified GHG Reduction Measures (Priority Measures Only)*

The PCAP will include a list of near-term, high-priority, implementation-ready measures that have been identified through a process of contractor and coordinating entities subject matter knowledge, peer benchmarking and public stakeholder engagement. For each measure, the PCAP will provide an estimate of the potential GHG emissions reductions, key implementing agency or agencies, implementation schedule and milestones, expected geographic location if applicable, milestones for obtaining legislative or regulatory authority as appropriate, identification of funding sources if relevant, and metrics for tracking progress.

- *Benefits Analysis (Encouraged)*

TDEC and coordinating entities will utilize modeling, analysis and stakeholder feedback to perform the preliminary, limited benefits analysis for PCAP priority GHG reduction measures. The PCAP will include preliminary estimates of co-pollutant reductions (e.g., PM_{2.5}, NO_x, SO₂, VOCs, air toxics, etc.) and/or other benefits associated with the selected GHG reduction measures. An initial assessment of benefits associated with these co-pollutant emission reductions such as improved public health outcomes, economic benefits, increased climate resilience, or other environmental benefits will be addressed to the extent time and resources allow. To the extent potential disbenefits are identified, those will be discussed in the benefits analysis.

- *Low Income/ Disadvantaged Communities Benefits Analysis*

As the preliminary, limited benefits analysis will be conducted for the PCAP around priority GHG reduction measures, TDEC and coordinating entities will estimate the amount and share of benefit in low income/disadvantaged communities for each measure as well as for the package of measures. The methodology for this analysis will rely on publicly available guidance as available and will consider the benefits of co-pollutant reductions. If potential disbenefits are identified, those will be discussed in the benefits analysis and will be tracked, minimized and mitigated to the extent possible.

- *Review of Authority to Implement*

TDEC and coordinating entities will identify existing authority to implement the priority GHG reduction measures, if applicable, and will include a schedule of milestones for actions needed by key entities to obtain authority if needed to implement a chosen measure.

- *Intersection with Other Funding Availability*

TDEC will leverage multiple resources to assist in evaluating intersection with other funding as time allows. TDEC intends to utilize Atlas Public Policy's Climate Program Portal to understand the intersection of the Inflation Reduction Act with other funding availability. The data sources for this portal are the text of the Bipartisan Infrastructure Law and Inflation Reduction Act. The funding for grants and direct spending refers to the total funding appropriated. Funding for loan programs and tax credits refers to the estimated budgetary impact from the Congressional Budget Office. Information is available by the sectors of transportation, commercial and residential, other climate, electricity, and industry. The funding requests are identified as request for proposal, request for information, notice of intent and public comment. Atlas Public Policy retains discretion over the data published on the Portal. TDEC will also leverage additional resources from national organizations and other third parties who are tracking these funding opportunities. TDEC's goal is to optimize resources and understand where funding opportunities can complement initiatives, identify funding gaps, and hedge the duplication of efforts.

- *Workforce Planning Analysis*

TDEC and coordinating entities do not anticipate having adequate time to complete a workforce planning analysis, nor is it required for the PCAP. If there are ongoing or immediate workforce activities identified for the priority GHG reduction measures, the PCAP may include some discussion of those activities.

PCAP Interagency and Intergovernmental Coordination:

To guide the development and adoption of the PCAP and future deliverables, TDEC will form a diverse, multidisciplinary advisory committee, tentatively called the Climate Resilience and Pollution Reduction Advisory Committee (CRPRAC), with representation from stakeholder groups with a vested interest in the climate planning grant. The goal of this committee is to serve as the primary advisory entity to TDEC and our contractors throughout the planning grant

lifecycle. The advisory group will support the identification of priority GHG reduction measures for inclusion in the PCAP and CCAP, promote participation in the subsequent implementation grant phase, ensure responsible and transparent use of planning funds, and track progress, outputs, and outcomes associated with the planning grant. The CRPRAC will also broaden our ability to undertake robust stakeholder and public engagement by leveraging the networks of those included in the CRPRAC.

TDEC has utilized the advisory committee model successfully in its programming and implementation of \$1.35 billion of State American Rescue Plan (Fiscal Recovery Funds) funding, allocated to TDEC to program in the form of water, wastewater, and stormwater grants for communities. This committee (Water Infrastructure Advisory Committee) engages closely with TDEC and TDEC’s contractors to advocate on behalf of their stakeholder groups and has contributed significantly to program development and implementation.

The CRPRAC will include representatives from agencies and offices involved in environmental protection, energy, utilities, transportation, housing, industry and other sectors that touch climate planning efforts. TDEC will leverage existing statewide partnerships to ensure an interdisciplinary group of stakeholders are engaged and have an opportunity to provide early and enhanced feedback to TDEC at all stages of the planning grant lifecycle. Committee members may include representatives from the following groups:

TDEC Offices / Divisions	Tennessee State Agencies	Other Agencies
Office of Policy and Planning	Department of Transportation (TDOT)	Local Air Pollution Control Agencies (Nashville, Memphis, Knoxville, Chattanooga)
Division of Air Pollution Control	Department of Health (TDH)	Local Governments
Division of Stakeholder Engagement	Economic and Community Development (ECD)	Regional Planning Agencies/ Metropolitan Planning Organizations
Office of General Counsel	Housing Development Agency (THDA)	Development Districts
State Energy Office	Department of Agriculture (TDA)	Tennessee Valley Authority (TVA)
Division of Solid Waste Management	Department of General Services (DGS)	Environmental Non-profit organizations
State Parks and Natural Areas	Wildlife Resources Agency (TWRA)	Environmental justice and advocacy organizations
Small Business Environmental Assistance Program	Labor and Workforce Development	Community-based Organizations
	Emergency Management Agency (TEMA)	Industry Groups
	Governor's Office	Trade Groups

TDEC’s Office of Policy and Planning (OPP) will chair the committee and work closely with TDEC’s Division of Air Pollution Control and Division of Stakeholder Engagement to set agendas, plan and facilitate meetings, coordinate communication with the CRPRAC, intake feedback and communicate feedback to TDEC and our consultants for development of key deliverables. A public facing website will be developed where public engagement opportunities will be shared, in addition to meeting agendas, presentations, and finalized deliverables. CRPRAC resources and draft deliverables will be shared through a SharePoint site.

The CRPRAC will meet on an *ad hoc* basis, with a goal of meeting quarterly throughout the grant award period of PCAP development (September 2023 - March 2024). The meetings will be hybrid, although members will be encouraged to join in-person as is feasible. Meeting priority items during PCAP development include:

- Sharing of public engagement opportunities, such as surveys or public meetings, with the request to amplify TDEC's reach through promotion through the CRPRAC's networks;
- Reviewing input from public engagement and supplementing with additional information or data;
- Updating the CRPRAC on the status of the PCAP;
- Tasking the CRPRAC with specific action items for the CRPRAC such as reviewing materials and providing timely feedback to TDEC; and
- Providing time for discussion and question and answer.

TDEC will communicate regularly with the CRPRAC through email between meetings. TDEC does not anticipate making any sub-awards as part of the interagency and intergovernmental coordination work.

PCAP Public and Stakeholder Engagement:

TDEC will actively engage the public and key stakeholders throughout the PCAP development process. This will be achieved through a combination of in-person and virtual events. TDEC proposes a minimum of eight stakeholder events across the state in years 1, 2 and 3 of the grant period –with one held in each large metropolitan area (Knoxville, Chattanooga, Nashville, and Memphis) and one held in mid-sized areas (Johnson City/Kingsport, Cookeville/Crossville; Clarksville, and Jackson). These locations target the large and mid-size cities across the state and also capture geographic diversity, with locations in West, Middle, and East Tennessee. Decisions for additional locations and events will be based on analysis conducted using federal screening tools to ensure disadvantaged communities can access and attend these events, with up to four additional locations selected for years 1 and 2 of the grant and up to two additional locations selected for year 3 of the grant. These events will be conducted statewide (hybrid format, with in-person and virtual options provided) to bring together all identified stakeholders and the general public. During these meetings, we will provide a broad overview of the climate action planning process and the input we hope to receive. We will also outline the more targeted approach for receiving feedback during the in-person meetings. Key stakeholders we intend to engage include industry, local governments, NGOs and low-income and disadvantaged communities.

TDEC will utilize the publicly facing website and create a listserv for stakeholders to receive key updates on the PCAP development, dates for public engagement opportunities, and the sharing of additional critical information related to the plan development. TDEC will also create and manage an email account to receive questions, comments, suggestions, etc. from the public as we develop the plan. We will actively promote and encourage stakeholders, especially those in low-income/disadvantaged communities to join our listserv and communicate with us through the established email account.

TDEC will use a community assessment approach to develop a plan for providing information to community stakeholders. The community assessment will help in achieving the goal of ensuring all stakeholders have the necessary information and an opportunity to be involved in the public participation process. Community assessment activities include:

- Gathering background information about the target community to determine the most effective methods of providing information.
- Outlining the issues and topics to be discussed and determine anticipated community concerns.
- Identifying community organizations, groups, and others that are impacted.
- Identify demographic information of the community, including data regarding Limited English Proficient (LEP) individuals.
- Determine the geographic limits of the target audience within each community.
- Identify community leaders and partnering opportunities within each community.
- Identify potential communication methods and resources within the community.
- Assess logistics for effective meetings.

- Identify the most effective time for the meetings.
- Use best practices to obtain feedback including comment cards, surveys, interviews, and contact sheets for documenting interactions with leaders and community members.
- Ensure facilities meet the needs of any persons with disabilities and will outline procedures for community members to notify TDEC of special needs (language, accessibility, etc.) they may need to be an active and engaged participant of these events.

Meetings will be conducted using a hybrid format and recorded. Prior to the public meeting, TDEC will ensure maximum participation by:

- Confirming meeting date, time and location.
- Scheduling the meeting using an appropriate web conferencing platform including a call-in number so members of the public can participate remotely by telephone without internet access.
- Publishing a public notice informing the community of the meeting purpose and topic.
- Allowing the public to request interpretive services.
- Publishing materials and information on TDEC’s webpage.
- Developing an agenda.
- Notifying community leaders directly about the meeting and addressing relevant issues and concerns.

After public meetings, TDEC will conduct post-meeting surveys with staff, community leaders, and the CRPRAC to determine what worked, what needs to be improved, and what items need to be addressed. Attendee’s exit surveys will be compiled into an Excel spreadsheet and shared with the CRPRAC. TDEC will evaluate the effectiveness of the public meeting and refine processes.

TDEC will utilize federal mapping tools (EJScreen and the Climate and Economic Justice Screening Tool) to identify low-income and disadvantaged communities for the purposes of this grant. All communities identified through the CEJST will be included in the low-income and disadvantaged communities list for enhanced engagement and inclusion in the benefits analysis. TDEC will follow guidance from the White House in utilizing the CEJST tool. Under the current version, 47% of census tracts within the State are considered disadvantaged. TDEC will further utilize EJScreen to add additional filters to those communities identified as disadvantaged under CEJST to look for the intersection of significant environmental burden and socioeconomic indicators. Through this additional analysis, TDEC may narrow to a target of 15-20% of census tracts within the State for further prioritization with public engagement and consideration of feedback as a part of the PCAP development.

After low-income and disadvantaged communities are identified, TDEC will undertake targeted strategies to ensure meaningful public engagement with these communities. TDEC will utilize the expertise of representatives on the CRPRAC from environmental justice communities to determine the needs and concerns of these populations and inform outreach strategies. Specific strategies will be determined based on the community and may include direct mailings to residences, distributing flyers to local community centers, houses of worship, and libraries, hosting meetings at accessible and familiar locations, and working directly with local leaders to share information. TDEC will also highlight responses received through surveys or public engagement sessions from community members in a low-income or disadvantaged community for consideration as action items and measures to be considered for the PCAP. Throughout the engagement process, TDEC will evaluate the effectiveness of these strategies and, when necessary, refine strategies to further enhance participation.

Key Deliverable #2: Comprehensive Climate Action Plan:

CCAP Development Approach:

TDEC and coordinating entities will complete all activities required to complete the CCAP by the established EPA deadline (two years from the award date). The discussion below details the approach that will be taken for each element of the CCAP. The schedule for the development of the elements is included in the section titled Schedule. Tennessee does not have a climate action plan, but TDEC will work to ensure the CCAP works in harmony with the existing climate plans for cities that have developed a plan or strategy (Memphis/Shelby County, Chattanooga, Knoxville and Nashville) and the PCAP.

- *GHG Inventory*

A comprehensive statewide GHG Inventory will be developed using EPA's State Inventory Tool (SIT) modules, as applicable, and built off the inventory completed for the PCAP. The base year for the inventory will be determined at the outset of this task. At a minimum, the inventory will account for the applicable SIT GHG emission modules of sources and sinks by emission source and sink category following commonly accepted protocols. Rollups will be targeted to coincide with the common sectors: industry, electricity generation and/or use, transportation, commercial and residential buildings, agriculture, natural and working lands, and waste and materials management but may be refined to reflect state-specific needs. The CCAP will be designed to enable county-specific output as possible based on available data.

- *GHG Emissions Projections*

Near-term (2030) and long-term (2050) projections of GHG emissions will be included in the CCAP. Projections of GHG emissions (and sinks, if feasible) in the absence of plan measures (e.g., a "business-as-usual" projection), and a projection of GHG emissions under a scenario where the plan is fully implemented will be developed. To the extent possible, sector-based projections will be provided. The EPA SIT Projection Tool or other similar EPA tools will be used to develop these projections.

- *GHG Reduction Targets*

The CCAP will include economy-wide near-term (2030) and long-term (2050) GHG emission reduction targets (on a gross or net GHG emission basis). Sector-based emission reduction targets will be developed for the highest priority sectors expected to be targeted by emission reduction measures at a minimum.

- *Quantified GHG Reduction Measures*

The CCAP will include a full suite of implementation measures that have been identified to meet the specified GHG reduction targets, based significantly on stakeholder engagement and public input. The plan will include measures addressing the main GHG emission sectors: industry, electricity generation and/or use, transportation, commercial and residential buildings, industry, agriculture, natural and working lands, and waste and materials management. For each measure included, the CCAP will identify the quantifiable GHG emissions reductions (or enhancement of carbon sinks), key implementing agency or agencies, implementation schedule and milestones, expected geographic location if applicable, milestones for obtaining implementation authority as appropriate, identification of funding sources if relevant, and metrics for tracking progress. Cost information for each measure will be provided.

- *Benefits Analysis for the full geographic scope and population covered by the plan*

TDEC and coordinating entities will utilize modeling, analysis and stakeholder feedback to perform the benefits analysis for the suite of GHG reduction measures included in the CCAP. The CCAP will include quantified estimates of co-pollutant reductions (e.g., PM_{2.5}, NO_x, SO₂, VOCs, air toxics, etc.) and/or other benefits associated with the GHG reduction measures in the CCAP. An assessment of benefits associated with both GHG

reductions and these co-pollutant emission reductions, such as improved public health outcomes, economic benefits, increased climate resilience, or other environmental benefits, will be included. If potential disbenefits are identified, those will be discussed in the benefits analysis and will be tracked, minimized and mitigated to the extent possible.

- *Low Income/ Disadvantaged Communities Benefits Analysis*

As the benefits analysis is conducted for the CCAP, TDEC and coordinating entities will estimate the amount and share of benefit in low income/disadvantaged communities for each GHG reduction measure as well as for the package of measures. The methodology for this analysis will rely on publicly available guidance as available and will consider the benefits of co-pollutant reductions building on the analysis included in the PCAP. If potential disbenefits are identified, those will be discussed in the benefits analysis and will be tracked, minimized and mitigated to the extent possible.

- *Review of Authority to Implement*

TDEC and coordinating entities will identify existing authority to implement included GHG reduction measures, if applicable, and will include a schedule of milestones for actions needed by key entities to obtain authority if needed to implement a measure.

- *Intersection with Other Funding Availability*

See text in response to this element in the PCAP discussion.

- *Workforce Planning Analysis*

An analysis of current workforce and identification of gaps between the current workforce and the workforce needed to implement GHG reduction measures based on respective implementation schedules needed included in the CCAP to achieve reduction targets will be completed. It is anticipated that interagency coordination as well as stakeholder engagement will include discussion of potential solutions to address identified gaps. The CCAP will identify potential partners at the state, regional and/or local level that are equipped to help address identified gaps. If there is existing funding or programs identified that can help support the workforce needs of the plan, the CCAP will identify those.

CCAP Interagency and Intergovernmental Coordination:

The CRPRAC formed during the development of the PCAP will continue to serve to support the development and adoption of the CCAP, with an anticipated meeting cadence of twice annually through this period of the grant award (April 2024 – September 2025). Following the adoption of PCAP, TDEC will work with members to evaluate the existing membership and determine if additional agencies or groups should be engaged for the CCAP. TDEC will ensure consistency across deliverables and continue to update internal resources and the external website with relevant information as the CCAP is developed.

CCAP Public and Stakeholder Engagement:

See discussion under PCAP Public and Stakeholder Engagements for planned events during year 2 and 3 of the grant period. Similar to the engagement plan for the PCAP, TDEC will actively engage the public and key stakeholders throughout the CCAP development process. This will be achieved through a combination of in-person and virtual events. Key stakeholders we intend to engage include industry, local governments, and low-income and disadvantaged communities.

TDEC will continue to update the website and listserv created for stakeholders to receive key updates from the PCAP development into updates for the CCAP development and implementation. Information conveyed will include dates for public engagement opportunities, information for how to engage with TDEC outside of these events, and the sharing of additional critical information related to the plan development and implementation. TDEC will continue to manage the email account created to receive questions, comments, suggestions, etc. from the public as we develop the CCAP. TDEC will continue to actively promote and encourage stakeholders, especially those in low-income/disadvantaged communities to join the listserv and communicate with the Department through the established email account and visit the website for more information and updates.

TDEC recognizes the importance of early and active engagement with low-income and disadvantaged communities across the state and will strive to ensure we receive robust feedback from these communities. TDEC will continue the approaches described for engaging with low-income and disadvantaged communities under the PCAP, following consideration of strategies that worked well and those that need to be altered for the CCAP.

Key Deliverable #3: Status Report

Status Report Development Approach:

TDEC and coordinating entities, if applicable, will conduct all activities required to complete the Status Report by the established EPA deadline (four years from the award date). The discussion below details the approach that will be taken for each element of the Status Report. The schedule for the development of the elements is included in the section titled Schedule.

TDEC will work to update the comprehensive GHG inventory included in the CCAP, if substantial new emissions warrant an update, if an update is determined to be beneficial, and if funding is available. If new emissions warrant and funding is available, TDEC will update the GHG emissions projections. The Status Report will include an update on the current status of plan implementation, including for individual GHG reduction measures identified in the CCAP. If a measure is still under development, the Status Report will identify the key parties responsible for action and include what actions are needed to complete implementation of the measure. If a measure is fully implemented, the Status Report will characterize progress using key metrics included in the CCAP. The Status Report will include an updated benefits analysis, including for low-income/disadvantaged communities for measures that have been implemented or are expected to be implemented. To the extent possible, any potential disbenefits resulting from GHG reduction measure implementation will be tracked, minimized and mitigated. Updated review of authority to implement will be included in the Status Report, as well as an updated review of funding availability. The Status Report will provide an update on the workforce development progress that has been made since the CCAP, including identification of any ongoing workforce development challenges that are inhibiting progress toward meeting the needs of the plan or new gaps and opportunities identified as the plan is implemented. Finally, the Status Report will identify next steps that TDEC expects to take to continue implementation of the CCAP, following closeout of the CPRG planning grant, including a discussion of actions, measures or planning that could be implemented should additional funding be provided along with a budget and staffing needs.

Status Report Interagency and Intergovernmental Coordination:

TDEC will be responsible for working with the CRPRAC established during the PCAP and CCAP deliverables in the development of Status Report at the end of the planning grant period, with an anticipated meeting cadence of twice annually during this period of the grant award (October 2025 – September 2027). Representatives from relevant offices internal to TDEC and external entities will be informed of the implementation status of the GHG reduction measures included in the CCAP and any updated analyses to support future implementation. Collaboration will occur through the communication methods established in the PCAP and CCAP, including email and hybrid meetings, if needed.

Status Report Public and Stakeholder Engagement:

In year 4 of the grant period, in-person engagement events will be planned, if necessary and as budget and timing allows, to gather feedback for developing the Status Report. Key updates regarding the status of the CCAP will be made available via our website and listserv, including but not limited to, the implementation status of the quantified GHG reduction measures, any relevant updated analyses (emissions, workforce, benefits, low-income/disadvantaged communities' benefits, etc.), projections supporting CCAP implementation, as well as next steps and identification of future budget and staffing needs to further CCAP implementation. To the extent possible, TDEC will also share information about funding opportunities pertinent to implementing measures included in the CCAP. TDEC will ensure low-income and disadvantaged communities are kept up to date by maintaining the communication methods utilized during PCAP and CCAP development and conducting additional virtual meetings, if necessary, to provide updates and receive comments on next steps. TDEC will also seek feedback from the public and key stakeholders prior to finalizing our report to EPA. Following the grant period, TDEC will continue to maintain its website with relevant updates to program progress and actively share these updates with stakeholders on an as-needed basis.

ENVIRONMENTAL RESULTS, OUTPUTS, AND OUTCOMES:

Please see Excel file, Workplan and Reporting tab for Environmental Results, Outputs and Outcomes information. It is anticipated that awards under CPRG will support EPA's Fiscal Year 2022-2026 Strategic Plan. Awards will support Goal 1, "Tackle the Climate Crisis Objective 1.1, "Reduce Emissions that Cause Climate Change."

Expected outputs from this planning grant include:

- A Statewide GHG Inventory
- A Priority Climate Action Plan (PCAP)
- A Comprehensive Climate Action Plan (CCAP)
- A Status Report
- Quarterly performance progress reports and the final report on grant activities
- Number of interagency/intergovernmental/local government/regional organizations/nongovernmental organizations/education partners participating in plan development
- Number of community members participating in plan development
- Number of public stakeholder meetings
- Dissemination of project information via TDEC's website, email listserv and TDEC social media channels

Expected outcomes from this planning grant include:

- Quantitative outcomes
 - Tons of pollution (GHG and co-pollutants) reduced over the lifetime of the measures identified in the PCAP and CCAP
 - Tons of pollution (GHG and co-pollutants) reduced annually
 - Tons of pollution (GHG and co-pollutants) reduced with respect to low-income and disadvantaged communities
- Qualitative outcomes
 - Creation of high-quality jobs with an emphasis on workers from low income/disadvantaged areas
 - Creation of a mechanism for interagency/intergovernmental coordination (CRPRAC)
 - Enhanced educational offerings in highly sought-after trades
 - Improved health benefits
 - Improved data and methodologies for benefits analysis as well as workforce and training needs

A large portion of grant funding will be used to procure a contractor for development of the PCAP and CCAP. TDEC expects to have regular meetings with the contractor to ensure all expectations and requirements are being met and reporting can be completed for progress reports. As TDEC is retaining management of the grant and interagency/intergovernmental coordination, information regarding expenditures as well as coordination and engagement progress will also be tracked and reported as required by EPA.

TDEC will track progress associated with grant activities through these expected performance measures:

- Completion of interim milestones and grant deliverables
- Number of community members engaged in the process during the grant period
- Number of public stakeholder meetings
- Number of CRPRAC meetings/engagement events

SCHEDULE:

The grant period for this planning grant is four years, a total of forty-eight months. The dates included in this discussion and in the Excel file assume the planning grant is awarded no later than August 1, 2023. The GHG inventory development will occur throughout the first three years of the grant as the PPCAP and CCAP are developed. The PCAP development will occur over an seven-month period, assumed to be August 1, 2023 through March 1, 2024. The following interim deliverables will occur during the PCAP development process:

- Draft limited GHG inventory, November 30, 2023
- Draft quantified GHG reduction measures (priority measures), January 31, 2024
- Draft limited benefits analysis, including low income/disadvantaged community benefit analysis January 31, 2024
- At least four public stakeholder events will occur by December 31, 2023; and
- The CRPRAC will be formed and have at least its initial meeting by September 31, 2023.

The PCAP, with all required elements and selected optional elements, will be submitted to EPA on or before March 1, 2024.

The CCAP development will occur over a two-year period, assumed to be August 1, 2023 through August 1, 2025. The following interim deliverables will occur during the CCAP development process:

- Draft comprehensive GHG inventory, August 31, 2024
- Draft GHG emissions projections, March 31, 2025
- Draft GHG emissions targets, March 31, 2025
- Draft comprehensive quantified GHG reduction measures, March 31, 2025
- Draft benefits analysis, including low income/disadvantaged community benefit analysis, March 31, 2025
- Draft Workforce planning analysis, April 30, 2025
- At least four (separate from PCAP) public stakeholder events by October 31, 2024; and
- At least three CRPRAC meetings (separate from initial meeting under PCAP) by March 31, 2025.

The CCAP, with all required elements will be submitted to EPA on or before August 1, 2025.

The Status Report will be developed in year 3-4 of the grant period after submission of the CCAP. The following interim deliverables will occur during the Status Report development process:

- Draft Status Report and updates for quantified GHG reduction measures, March 31, 2027
- Draft next steps/future budget/staffing needs, March 31, 2027.
- At least four (separate from PCAP and CCAP) public stakeholder events by August 1, 2026

TDEC is currently unsure whether it will utilize a contractor to perform updated benefits analysis, including low income/disadvantaged community analysis and updated workforce planning analysis. Should a contractor be engaged for this work, TDEC will establish interim deliverables at that time. The Status Report, including all required elements, will be submitted to EPA on or before August 1, 2027.

REPORTING:

TDEC's Division of Air Pollution Control will be responsible for completing the reporting requirements under the CPRG planning cooperative agreement. The Division will submit quarterly performance progress reports that provide grant funding reporting elements and summaries of the project activity, including difficulties encountered and financial expenditures made to date as well as the status of outputs during the reporting period. The quarterly report will be submitted within 30 days after the end of the reporting period. The reports will identify any changes in key personnel.

The final quarterly report will include a high-level summary of activities completed during the grant project period, copies of all deliverables, a synopsis of outputs and outcomes achieved as of the date of the report, and a financial summary of expenditures during the grant period. The final quarterly report will be submitted to EPA within 120 calendar days of the project/budget period end date.

BUDGET:

Details for the budget for this grant are included in the Excel file, TN Budget tab.

CLIMATE INNOVATION TEAMS (OPTIONAL):

TDEC does not anticipate participation in a Climate Innovation Team at this time due to the short timeframe provided for both the PCAP and the CCAP and the requirements for all deliverables associated with the CPRG program.