

Oklahoma Pollution Reduction Plan
Oklahoma Department of Environmental Quality
April 2023

Workplan Summary

Oklahoma is proud of our “all energy approach”. We currently use 45% renewables for powering Oklahoma. The state is number three in the nation for wind-power produced energy which provides 41% of Oklahoma’s in-state net power generation. Oklahoma has the potential to become a top ten producer for solar power. The Oklahoma Department of Environmental Quality (DEQ) received an award from Governor Fallin in 2015 for being the first state agency to hit the 20% energy savings goal. As of the end of FY 2019, DEQ had achieved a 42% reduction in energy usage since the baseline year of 2012. Our commitment to reducing emissions runs deep in Oklahoma.

This Grant will provide the opportunity to quantify the state’s greenhouse gas (GHG) reduction potential by developing a current GHG inventory, emissions projections, GHG reduction targets and goals. DEQ is pleased to submit an application for the CPRG opportunity. The funds will be used to develop a statewide Priority Action Plan (PAP), Comprehensive Action Plan (CAP), and Status Report.

Oklahoma is uniquely positioned to part of the hydrogen economy. The production of hydrogen will result in the reduction of GHG in all sectors. As a result of the recent Governors OK H2 Task force in 2021 Oklahoma became part of the HALO Hydrogen Hub. This partnership with the states of Louisiana and Arkansas will focus first on the research and development as needed. Oklahoma will leverage knowledge gained through preparation for the hydrogen hub partnership that will ultimately demonstrate the production, processing, delivery, storage, and end-use of clean hydrogen. DEQ will explore complementary activities to support the development of the hydrogen economy. DEQ and partners are currently evaluating carbon capture, utilization, and storage opportunities. This work will continue to be evaluated as part of the planning process.

Hydrogen plays a key role in the diversification of energy sources, fostering business and technological innovation. Hydrogen’s unique properties make it a powerful enabler for energy-system transitions, with benefits for both the energy system and end-use applications like transport, power generation, energy storage, building heating and cooling, and industrial applications. These efforts will create quality jobs, drive equitable and inclusive economic opportunities, improve environmental outcomes through reduced GHG and non-GHG emissions, and establish the HALO Hub as a model for replication across the U.S.

Studies to better characterize methane emissions from the Oil & Gas (O&G) industry will be completed with the goal to refine emission factors. This work will contribute to an improved GHG emissions inventory and potentially identify improved best practices and new technologies for methane reductions. Low-cost CO₂ sensors, methane detection analyzers, and drone technology

will be used to gather data and monitor air quality throughout the state including rural/disadvantaged communities.

Development of a GHG inventory for Oklahoma will be a key component of the project and necessary for developing the PAP and CAP. DEQ will develop pollution reduction goals during this planning period by creating an accurate GHG inventory that reflects Oklahoma's current emissions. A primary goal is to identify potential emission reductions in priority industrial sectors with a commonsense approach. Partnering with and listening to stakeholders, including low-income disadvantaged communities, tribes, work force development, and business communities, to name a few, will ensure equity among the many priorities of the CPRG.

Oklahoma has identified several potential partners, stakeholders, and disadvantaged community representatives that will be engaged during the planning process. In addition, EJScreen, EPA's environmental justice screening and mapping tool, will be used to further determine areas of the state with disadvantaged communities. Through outreach via virtual and public meetings, social media, and the agency website, DEQ will encourage participants to share ideas and community needs. This collaboration will be critical to the development of Oklahoma's pollution management plan.

RESPONSIBLE ENTITIES

LEAD AGENCY

The Oklahoma DEQ will serve as the lead agency, in coordination with the Office of the Secretary of Energy and Environment. The primary contact for the cooperative agreement is Angela Hughes of DEQ.

Contact information:

Angela Hughes, Senior Manager
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COORDINATING ENTITIES

DEQ has commitments of coordination and collaboration with University of Oklahoma, Oklahoma State University, Petroleum Alliance, Southern Plains Transportation Center, Oklahoma Department of Transportation, Oklahoma Corporation Commission, Onward OKC Career Tech Compact, Oklahoma City Office of Public Works, Association of Central Oklahoma Governments, Indian Nations Council of Governments, Environmental Federation of Oklahoma, Chickasaw Tribe, and the Council of Black Mayors. DEQ will continue to identify and reach out to additional stakeholders throughout the planning process.

DELIVERABLES DEVELOPMENT PROCESS

Proposed Approach

DEQ will develop the PAP and CAP, and Status Report by:

- teaming with universities
- working with partners and stakeholders
- hiring skilled contractor(s)

DEQ may utilize contractor(s) to produce and deliver the required deliverables. This includes the PAP, CAP, and Status Report. The DEQ grant manager will oversee the contractor effort. The contractor will be required to meet regularly with DEQ, provide a professional Gantt chart identifying the project critical path and milestones, and assist with the information gathering for the required EPA quarterly reports. The milestone schedule is listed here and dates are included in the required Schedule Section at the end of this workplan.

PAP draft due for internal review January 31, 2024

PAP due to EPA March 1, 2024

CAP draft due for internal review June 30, 2025

CAP due to EPA July 31, 2025

Status Report draft due for internal review May 30, 2027

Status Report due to EPA June 30, 2027

Key Deliverable #1 Priority Action Plan

The PCAP narrative report will establish near-term and long-term GHG emission reduction goals that could be achieved through implementation. DEQ will utilize the preliminary GHG inventory developed in the PCAP to identify the best measures. DEQ will evaluate each project to determine emissions reduction.

DEQ will collaborate with the O&G industry to conduct a study to better characterize methane emissions and refine current emission factors. After completion of the initial GHG inventory research, DEQ will assist the top five (5) industrial sectors in evaluating potential pollution reductions for inclusion in the CAP. DEQ may begin discussions with career techs to determine the optimum way to engage statewide so they can begin programing for training efforts that will be needed before the four-year planning period is over. Oklahoma agencies are committed to collaborating with key stakeholders to identify financial and other externalities that will aid those stakeholders as they invest in future projects. This is a planning document, and it would be premature to identify specific project commitments at this stage, but DEQ will explore a broad suite of options as listed below.

As required, the PAP will include:

- A GHG Inventory
- Quantified GHG reduction measures
- A low-income and disadvantaged communities' benefits analysis
- A review of authority to implement

GHG inventory

The GHG inventory effort will utilize EPA tools, including but not limited to MOVES, AVERT, and SIT. DEQ uses Windsor Solution's State and Local Emissions Inventory System (SLEIS) to collect its point source emission inventories. Air Quality staff will research the need to upgrade and utilize SLEIS to collect, store, maintain, and/or update the comprehensive GHG inventory. Air Quality staff will research the need to build a new database to store and/or maintain the inventory. DEQ will coordinate with all partners to ensure our efforts are coordinated and not duplicated.

Quantified GHG Reduction Measures

Developing and updating a high-quality statewide GHG inventory will assist programmatic efforts towards meaningful reductions in GHGs. DEQ sees value in three different approaches managed by the EPA: the Inventory of U.S. Greenhouse Gas Emissions and Sinks, the Greenhouse Gas Reporting Program (GHGRP), and the NEI. DEQ intends to synthesize information from these sources as well as field studies and other sources based on stakeholder input. DEQ will leverage emissions inventory expertise from state, regional, and national collaborations that was developed while working with EPA, Multi-Jurisdictional Organizations, local, and tribal partners on the 2016 Emissions Modeling Platform and National O&G Emissions Committee.

The following projects are just a few of the efforts that will be considered during the PAP planning for inclusion in the CAP. Project elements and new projects may be added as research becomes available.

- **Electric Vehicle Charging Infrastructure**

Oklahoma Department of Transportation is receiving \$66.3 million in National Electric Vehicle Program funding. DEQ and DOT will coordinate efforts and work to leverage funding to benefit both programs. In addition, the Southern Plains Transportation Center studies sustainable transportation and clean energy corridors. Their plans to assess vulnerability in transportation infrastructure in relation to extreme weather and other conditions will be an asset to help DEQ reach our planning goals. Innovative research, effective implementation, workforce development, and well-organized programs will be considered in our planning efforts.

- **Methane Detection and Reduction**

By partnering with the Petroleum Alliance, DEQ will commence a study on methane emissions specific to Oklahoma. This will allow for a more accurate and complete GHG Emission Inventory and more reliable and accurate emission factors. One way to gather emissions data is utilizing handheld optical gas imaging (OGI). OGI has been a vital resource for the DEQ compliance & enforcement group for the past 13 years. OGI inspections have resulted in the discovery and repair of thousands of methane/VOC leaks from oil and gas components. OGI technology is currently used in virtually every environmental complaint investigation and is routinely used in scheduled compliance evaluations at oil and gas facilities. While handheld OGI cameras have proven to be a tremendous tool for achieving emission reductions, it can still take a lot of time to cover large gas production facilities that do not provide easy access

between various locations within a system. With aerial OGI technology, an operator scanning for leaks can cover more facilities or locations in a fraction of the time when compared to handheld cameras. An aerial OGI operator can scan 4 to 5 facilities in one 25-minute flight, a task that may take 3 to 4 hours with handheld OGI. This makes it much more efficient to catch the 1% of leaks that account for 99% of emissions. Using aerial OGI technology diminishes the possibility of missing big leaks that are the considered significant sources of methane emissions.

- **Methane Detection with Sensors and Analyzers**

EPA's Air Sensor Toolbox has advanced air sensor technology by including performance evaluations of sensor devices and the development of best practice recommendations for effectively using sensors. DEQ partnered with EPA on projects that have furthered this work, through our role as a pilot partner in EPA's Village Green Project, our continued operation and transformation of the Village Green Bench into a sensor testing platform, and more recently as a partner providing collocation and sensor operation assistance in EPA's Long-Term Performance Project. This project utilized six different types of sensors and sensor suite packages to collect a broad range of pollutant data.

DEQ continues to perform this type of testing and research into these advancing technologies, with the goal of staying prepared in this rapidly developing world. With the strong background knowledge developed through this process, DEQ can now work with project partners on many levels, ranging from simple informational support and sensor siting assistance all the way to full operations, including data collections and analysis. This work will provide a foundation for continued studies in methane detection and developing additional GHG reduction goals.

- **Renewable Energy Analysis**

DEQ will explore complementary activities to support the development of the hydrogen economy. With Oklahoma's strong renewable economy already in place we could include one or more of the following:

- An investigation of air quality impacts of different options to address changes in renewable energy availability in real time, including an evaluation of the costs and benefits.
- An evaluation of the costs and benefits of electrification of natural gas compression in various regions including portions of the Anadarko Basin in northwest Oklahoma to relieve demand on electrical transmission lines. An investigation of necessary incentives would help prioritize cost-effective options that result in significant additional renewable energy generation.
- An evaluation of the possibility of generating hydrogen gas using excess electrical generation from wind power in northwestern Oklahoma to enable feeding that "green hydrogen" into natural gas pipelines (along with the natural gas currently under production) as a proof of concept.

- **Carbon Capture, Utilization and Storage**

Oklahoma stakeholders have been investigating and deploying the use of CO₂ for enhanced oil recovery. Expertise in petroleum engineering and geology is critical to technology development and Oklahoma has begun development of state capabilities through adoption of the “Oklahoma Carbon Sequestration Enhancement Act.” Additional investigation is warranted, and this planning grant will further that work. The Oklahoma pipeline infrastructure and proximity to depleted oil and gas fields, salt domes, and saline aquifers are ideal for efficient storage and production of H₂ while also storing CO₂.

Consideration of new policies such as deploying incentives to bring about use of methane reformation in northwestern Oklahoma to generate (a) hydrogen gas to feed into pipelines along with existing natural gas production and (b) CO₂ capture for enhanced oil and gas recovery combined with sequestration could speed up the reduction of emissions.

Low-Income and Disadvantaged Communities’ Benefits Analysis

DEQ will utilize readily available census data, K-12 school contacts, community outreach, social scientists, church outreach, and much more to identify rural, minority, and low-income disadvantaged communities (LIDAC). This effort will help inform the benefits analysis. Both GHG and co-pollutant reduction could include benefits such as improved access to services, improved health, jobs created by workforce development, and decreased energy cost from energy efficiency improvements. DEQ will watch for further EPA guidance that recommends analytical approaches and metrics for estimating benefits flowing to LIDAC in support of Justice40.

When selecting sites for projects that target emission reductions, DEQ considers whether the area has historically been near-non-attainment for the National Ambient Air Quality Standards (NAAQS). Areas considered near-non-attainment for the NAAQS includes the Oklahoma City and Tulsa greater Metropolitan Statistical Areas, which represent Oklahoma’s densest population centers. Because these are Oklahoma’s major urban centers, these areas include much of Oklahoma’s disadvantaged population in terms of exposure to air pollution, numbers of households of low income, and numbers of minorities. In addition, the Tulsa area is also within the boundaries of the Muscogee-Creek Nation, which is one of the many indigenous tribes that are considered to be disadvantaged communities. DEQ strives to spend project funds cost-effectively, with the goal to achieve the greatest emission reductions for the greatest population at the least cost.

Review of Authority to Implement

DEQ has the necessary authorities to carry out all the anticipated projects and activities related to this CPRG workplan, including the PAP and CAP. 27A O.S. §§ 1-3-101(B) and 2-5-105 give DEQ jurisdiction over air quality in the state of Oklahoma, and, specifically, designate it as the administrative agency for the Oklahoma Clean Air Act (CAA) and the implementing state agency for the federal CAA. In accordance with 27A O.S. § 2-3-101(E)(1) and OAC 252:4-1-3(c), DEQ has an Air Quality Division (AQD) that implements and carries out these statutory and regulatory authorities and responsibilities for the agency; the AQD has the authority to carry out all duties, requirements, and responsibilities necessary and proper for the implementation of the Oklahoma CAA, for fulfilling the requirements of the federal CAA, and for the implementation of all air

quality regulations adopted by the Environmental Quality Board. For the CPRG, this will include relying on the regulations in OAC 252:100, Air Pollution Control, which implements Oklahoma's state air quality rules as well as incorporates by reference federal NSPS and NESHAP regulations.

PAP Interagency and Intergovernmental Coordination

DEQ will coordinate with appropriate agencies and offices with the state of Oklahoma, local governments, and Oklahoma tribes. DEQ will hold engagement meetings throughout Oklahoma to solicit input directly from local governments. Separately, DEQ will consult with Tribal Nations and/or consortiums in the development of these plans with the expectation of tribal input. DEQ will promote constant dialogue with partners and stakeholders in this development phase of the Grant. We will maximize the use of virtual meetings to reduce the overall costs and maximize stakeholder involvement and participation. This will reduce the need for travel and the use of fossil-fueled vehicles thus preventing additional environmental impact. DEQ will provide draft copies of the PCAP as they become available. DEQ will document stakeholder input at the meetings.

Specifically, DEQ will solicit input from partners and stakeholders to identify existing and potential new measures that could lead to further GHG reductions. This input could be solicited in numerous ways such as surveys sent via electronic and physical mailouts, meetings, and other input opportunities.

DEQ is currently working with state agencies, Oklahoma universities, tribal entities, and local governmental agencies to determine projects and planning coordination opportunities for the CPRG. At this stage in the planning effort DEQ cannot contractually commit to awarding funding as a subaward or contract. Because of the extensive effort and required specialty work required by the CPRG it is understood that agreements will be put into place to accomplish the tasks laid out. DEQ will follow all requirements of the state procurement rules and requirements as well as the federal requirements in 2 CFR Part 200.

PAP Public and Stakeholder Engagement

DEQ plans to hold public engagement meetings throughout Oklahoma to solicit community input for the PCAP. Further, Oklahoma DEQ will promote constant dialogue with partners and stakeholders in this development phase of the grant. Specifically, DEQ will solicit input from stakeholders to identify existing and potential new measures that could lead to further GHG reductions. This input could be solicited in numerous ways such as surveys sent via electronic and physical mailouts, meetings, and other input opportunities. DEQ will maximize the use of virtual meetings to reduce the overall costs and maximize stakeholder involvement and participation. This will reduce the need for travel and the use of fossil-fueled vehicles thus preventing additional environmental impact. The map below shows potential meeting locations to ensure statewide coverage.



Key Deliverable #2 Comprehensive Action Plan

The DEQ will establish near-term and long-term GHG emission reduction goals, propose strategies and identify measures to achieve those goals, and identify significant GHG sources and sinks for Oklahoma. The following elements will be included in the CAP:

GHG Inventory

DEQ will continue to refine the GHG Inventory, updating with new data as available. New and updated tools will be utilized, and the inventory will undergo quality control. Under the CAP, DEQ will develop a comprehensive GHG inventory, and near-term and long-term GHG inventory projections utilizing EPA tools, including but not limited to MOVES, AVERT, SIT, and Inventory Projection Tool. DEQ will research the need to build a new database to store and/or maintain the inventory. The preliminary GHG inventory under the PAP will be used as a guide for the comprehensive GHG inventory.

GHG Emissions Projections

The GHG inventory projections effort will utilize EPA projection tool(s), including but not limited to Inventory Projection Tool. DEQ plans to utilize the methane study to inform the triennial National Emissions Inventory (NEI) oil and gas submission, Emissions Modeling Platform (EMP), and comprehensive GHG inventory/projections. If DEQ is successful in developing new emission factors through the methane study, DEQ will share the data with EPA so that EPA can evaluate updating the GHGRP default emission factors for oil and gas facilities.

GHG Reduction Targets

DEQ will review the GHG and co-pollutant reduction potential, costs, and benefits of each reduction measure.

Quantified GHG Reduction Measures

DEQ will take the information gathered from the PAP and further refine the measures evaluated.

- **Methane Detection and Reduction:** DEQ will continue the partnership with the Petroleum Alliance and finalize the study on methane emissions specific to Oklahoma O&G. Data from this study will provide data for a more accurate and complete GHG Emission Inventory and more reliable and accurate emission factors. The final study is expected to result in opportunities for best practices and methane reduction. Oklahoma’s Rebate Program for O&G could be leveraged providing funds for the installation of new technology and equipment to reduce emissions.
- **Hydrogen**
Oklahoma is partnering with Arkansas and Louisiana to potentially create a hydrogen hub. Greenhouse gas reduction by relying on hydrogen fuel and less on fossil fuels. The hub will demonstrate the production, processing, delivery, storage, and end-use of clean hydrogen. These efforts will create quality jobs, drive equitable and inclusive economic opportunities, improve environmental outcomes through reduced GHG and non-GHG emissions.

Benefits Analysis for the Full Geographic Scope and Population Covered by the Plan

DEQ will perform a benefits analysis that will be inclusive of regional considerations, technologies, market forces, potential leveraging of other funding opportunities, and partnerships. Community benefits and disbenefits will be evaluated and tracked throughout the planning period.

Review of Authority to Implement

As stated in the PAP section, DEQ has the necessary authorities to carry out all the anticipated projects and activities related to this CPRG workplan.

Intersection with Other Funding Availability

DEQ will monitor and review other grant opportunities available through the Inflation Reduction Act and other state and federal funding opportunities that could complement the work identified through our CPRG activities.

The Oklahoma legislature passed a bill to create the “Oklahoma Emissions Reduction Technology Rebate Program (ERTRP). This program, if funded, offers a rebate of up to 25% of documented expenditures made in the state that are directly related to the implementation of a qualified O&G industry “Emission Reduction Project.” The program is administered jointly by the DEQ and the Oklahoma Tax Commission. The focus of the ERTRP is to incentivize and encourage emissions reductions projects in the upstream and midstream oil and gas production, exploration, completions, gatherings, storage, processing, and transmission activities by using existing or new technologies. This program complements methane detection studies proposed in the CPRG.

Workforce Planning Analysis

Workforce related challenges and opportunities can be a critical element of assessing the feasibility of GHG reduction measures. These may include skilled labor shortages, impacts on existing jobs and industries, opportunities for the creation of high-quality jobs, and expanding economic

opportunity to underserved workers through activities in the plan. DEQ will identify activities and policies that will lead to the creation of high-quality jobs in alignment with the U.S. Department of Labor's Good Jobs Principles.

DEQ will conduct an analysis of anticipated workforce shortages that could prevent them from achieving the goals described in the CAP and identify potential solutions and partners at the state, regional, and/or local level that are equipped to help address those challenges. DEQ has already formed an important relationship with a career tech consortium OnWard OKC in conjunction with the University of Oklahoma to provide requisite skills to assist the Oklahoma workforce to attain training, basic knowledge, and certification in pollution reduction efforts and GHG reduction through effective monitoring and remediation. DEQ will support meaningful community and labor engagement, advance diversity, equity, inclusion, and accessibility to ensure the workforce is ready for the clean energy economy.

CAP Interagency and Intergovernmental Coordination

DEQ will coordinate and solicit input from appropriate agencies and offices with the state of Oklahoma, local governments, and Oklahoma tribes. Separately, DEQ will consult with Tribal Nations and/or consortiums in the development of these plans with the expectation of tribal input. Further, Oklahoma DEQ will promote constant dialogue with partners and stakeholders in this phase of the grant.

Specifically, DEQ will solicit input in a variety of ways such as surveys sent via electronic and physical mailouts, meetings, and other input opportunities. DEQ will maximize the use of virtual meetings to reduce the overall costs and maximize stakeholder involvement and participation. This will reduce the need for travel and the use of fossil-fueled vehicles thus preventing additional environmental impact.

CAP Public and Stakeholder Engagement

DEQ plans to hold additional public engagement meetings throughout to solicit community input for the CAP. Further, Oklahoma DEQ will promote constant dialogue with partners and stakeholders in this phase of the grant. Specifically, DEQ will solicit input from stakeholders to identify existing and potential new measures that could lead to further GHG reductions. This input could be solicited in numerous ways such as surveys sent via electronic and physical mailouts, meetings, and other input opportunities. DEQ will maximize the use of virtual meetings to reduce the overall costs and maximize stakeholder involvement and participation. This will reduce the need for travel and the use of fossil-fueled vehicles thus preventing additional environmental impact.

Key Deliverable #3 Status Report

For the Status Report, DEQ will use recent and forecasted changes in programs and emissions at the time the Status Report is prepared to inform and update schedules. DEQ will identify potential actions and measures, along with a detailed budget and staffing needs, if additional funding were made available.

The Status Report will reference these required elements:

- Implementation Status of GHG Emission Reduction Measures
- Updated Benefits Analysis for the Full Geographic Scope and Population Covered by the Plan
- Updated Low-Income and Disadvantaged Communities Benefits Analysis
- Updated Review of Authority to Implement
- Review of Intersection with Other Funding Availability
- Workforce Development Progress
- Next Steps/Future Budget/Staffing Needs

The draft Status Report will be made available at stakeholder meetings, through tribal consultation, and to the public at large. DEQ will make the draft available on the website and inform stakeholders through social media to obtain as much input as possible.

Status Report Interagency and Intergovernmental Coordination

DEQ will utilize the information gained during the PAP and CAP to update and improve communication and coordination with tribes and partner agencies. DEQ will include a complete list of all organizations involved and determine future opportunities for partnering in the implementation phase.

Status Report Public and Stakeholder Engagement

Throughout the grant period DEQ will work to determine the next steps and funding opportunities for continued engagement beyond the grant period. This information will be compiled and included in the Status Report. For the Status Report engagement strategies will be evaluated and a lessons learned section may be included. This will help inform the next steps for implementation.

Environmental Results, Outputs, and Outcomes

While the State of Oklahoma has not elected to dictate actions by energy-generating and consuming sectors of the Oklahoma economy, Oklahoma state agencies have a role to play as a clearinghouse of information that can help industry stakeholders and citizens choose a more well-informed path to achieving economic growth while lowering emissions of both GHGs and other pollutants. DEQ has not deployed command-and-control policies to *enforce* a movement toward adoption of renewable energy sources, Oklahoma's use of incentives, our commitment to engagement with stakeholders, our focus on leveraging economic incentives, and our long-term focus on an "all-of-the-above" market-based approach to energy generation has yielded a greater penetration of renewable sources in Oklahoma than has been the case for many other states which have adopted more coercive measures.

The outputs of the requested projects will include:

- PAP
- CAP
- Status Report
- Tons of GHG Emissions Identified in Inventory

- Number of emission reduction measures identified
- Number of outreach meetings/annual stakeholders engaged
- Tons of GHG reduced annually
- Final report to EPA

Expected outcomes from projects funded under this program may include, but are not limited to:

- Tons of GHGs and co-pollutants reduced over the lifetime of the measures
- Tons of GHGs and co-pollutants reduced in low-income and disadvantaged communities
- Improved staff capacity and knowledge of new technology
- Increased community engagement
- Improved ambient air quality
- Increased jobs creation through workforce development

Performance Measures

DEQ will develop performance measures to track progress of the proposed projects and plan implementation efforts. These performance measures will be included in the reporting and be a basis of the Status Report. These performance measures will be included in reporting and be a basis of the Status Report. Examples of performance measures include, but are not limited to the following:

- Target outreach to include Low-Income and Disadvantaged Communities to encourage input and provide information to support PAP and CAP development
- Target outreach to and work with partners to promote economic development
- Determine percent of population living in areas that will benefit from emission reduction
- Track progress of each project and evaluate feasibility to achieve emission reductions
- Monitor expenditures for adherence to the budget
- Oversight of contractor and subgrantees to ensure work is accomplished according to timelines and milestones are met