



December 5, 2022

Michael Regan, Administrator
US Environmental Protection Agency
Office of the Administrator, Mail Code 1101A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OA-2022-0859

Dear Administrator Regan, EPA Staff, and Members of the Environmental Finance Advisory Board,

The American Sustainable Business Network (ASBN) and Businesses for Conservation and Climate Action (BCCA) appreciate the opportunity to comment on the Environmental Protection Agency's ("EPA") Request For Information ("RFI") on the Greenhouse Gas Reduction Fund ("GGRF"; the "Fund") program design and implementation.

American Sustainable Business Network is a movement builder in partnership with the business and investor community. ASBN develops and advocates solutions for policymakers, business leaders, and investors that support an equitable, regenerative, and just economy that benefits all—people and planet. As a multi-issue, membership organization advocating on behalf of every business sector, size, and geography, ASBN and its association members collectively represent over 250,000 businesses across our networks.

Businesses for Conservation and Climate Action was established in 2021 to 'convene the conveners' and bring ideas grounded in lessons from the front lines of climate change to the halls of power. BCCA is a group of Indigenous and non-Indigenous community-based, resource-dependent small-scale business leaders from across the country. BCCA is formed around the collective vision that solutions between humans and nature are rooted in rediscovering our place within the global ecosystem. Our mission is to establish national policies that recognize sustainable small businesses as compatible with healthy lands and oceans, and to enhance rather than exclude these sustainable businesses from conversations about resource access at every step of the decision-making process.

Together, ASBN and BCCA's work is guided by a firm commitment to social equity, local and traditional wisdom, and triple bottom line solutions that restore social, ecological, and economic health for people and planet.

Before elaborating on the details of the EPA's Request for Information, we are providing some core principles and background that we urge the EPA to consider as it makes decisions about program implementation.

- We acknowledge the historic and systemic barriers to capital and opportunity for Black, Indigenous, Latinx, Asian communities, women and gender nonconforming as a significant barrier

to our collective mission. Our work requires that we place an urgent and immediate focus on justice, equity, diversity and inclusion (“JEDI”).

- We believe in a fully participatory economy, that all people must be able to access the goods, services and resources supplied by the economy by way of just labor, consumer, financial and producer markets. A just and inclusive economy must be supported by strong public policy regulatory guidance and guardrails, and a strong democracy.
- We recognize that environmental and social stewardship is not enough and that in order to have equitable and just access to the resources we all depend on, that our solutions must prioritize regeneration for all people and the planet
- We advocate for regenerative, restorative and reparative solutions throughout the business and investor movement that ASBN leads. We believe that a thriving and vibrant business landscape and economic system is only durable and long-term if it prioritizes justice-informed access to resources, capital, opportunity and community for all.
- All of the solutions we advocate for, from investment terms to governance to risk assessment and beyond, are best served when co-created by all stakeholder groups having full and participatory access to decision making.
- We prioritize implementing and supporting transparency and accountability, both as an internal standard, and as a democratic public policy and economic imperative for policy makers, businesses and investors.
- We believe that our economy and society are highly complex, dynamic and distributed systems, requiring both bold leadership and long-term planning in order to achieve the systemic change we need to see.
- More than seventy-five percent of the unelectrified homes in the United States are located on Tribal lands, according to the American Public Power Association.
- Tribal communities suffer from higher costs of service, higher interconnection fees, more blackouts or brownouts and remote and distant service locations.
- The core recommendation is that federal funding and programming cannot focus on federal, state, or Tribal governments alone. The opportunity cost of not investing in the private sector is too high. There are over 100 Native financial institutions (including NCDFIs), thousands of non-tribally owned non-profits, economic development corporations, and other key Indigenous-led intermediaries that can help generate, channel and manage resources, in order to help our communities and entrepreneurs make the best and highest use of the large influx of capital through GGRF and related programs including the Bipartisan Infrastructure Act and linked priorities including the America the Beautiful Program.

Section 1: Low-Income and Disadvantaged Communities

1. *What should EPA consider when defining “low income” and “disadvantaged” communities for purposes of this program? What elements from existing definitions, criteria, screening tools, etc.,*

- in federal programs or otherwise - should EPA consider when prioritizing low-income and disadvantaged communities for greenhouse gas and other air pollution reducing projects?

When defining low-income and disadvantaged communities, the EPA should incorporate the most inclusive definition used in the current administration, for example the definition used for Justice 40 and for the Climate and Economic Justice Screening Tool, while further recognizing the unique disparities that situate many Indigenous Peoples and their respective Tribal communities as low-income and disadvantaged compared to other population demographics of the United States.

Furthermore, we suggest that the EPA incorporate elements of environmental justice such as climate change, clean energy, energy efficiency, clean transit, remediation and reduction of legacy pollution, and the development of critical clean water and wastewater infrastructure, as defined in the Justice 40 Initiative.

We also suggest that the EPA include and implement the principles, goals, and actions established by the Council on Environmental Quality following their action plan for consultation and coordination with Tribal Nations and Indigenous Peoples.

2. What kinds of technical and/or financial assistance should the Greenhouse Gas Reduction Fund grants facilitate to ensure that low-income and disadvantaged communities can participate in and benefit from the program?

The EPA should make GGRF resources available and flexible enough to support and advocate for self-learning, institutional knowledge, and long-term commitments to help establish experienced professionals and practitioners from the community to move project development forward. In particular, ASBN and BCCA support the use of the Community Development Financial Institution (CDFI) model as the primary vehicle for the deployment of GGRF funding. The flexibility of these resources would further promote the tradition of self-determination for Indigenous Peoples and Tribal communities and allow them to participate in and benefit from the program, as would they benefit initiatives to enhance leadership, self-determination, and self-sufficiency in other BIPOC communities.

3. What kinds of technical and/or financial assistance should the Greenhouse Gas Reduction Fund grants facilitate to support and/or prioritize businesses owned or led by members of low-income or disadvantaged communities?

We suggest that the EPA focus on additional grant development, no-interest loans, forgivable loans, and access to business consultants, experts, and learning cohorts to help facilitate the development and direction of projects within those low-income or disadvantaged communities. Accessibility to these options as supplements to access to capital would significantly increase participation to communities, industry sectors, and communities that are less familiar with such programs and are therefore the ideal targets for removing barriers to access. Such programs would enhance the sustainability of businesses owned or led by members of low-income or disadvantaged communities accessing funds made available by GGRF.

Section 2: Program Design

1. What should EPA consider in the design of the program to ensure Greenhouse Gas Reduction Fund grants facilitate high private-sector leverage (i.e., each dollar of federal funding mobilizes additional private funding)?

EPA should consider private sector partners with relationships in target communities. For example, ASBN recently signed a Memorandum of Understanding with the Department of the Interior to facilitate connections with Indigenous communities and social venture capital organizations to support Tribally-led community based economic development entrepreneurship based on Traditional Ecological knowledge. Consideration should also be prioritized for matching resources for coalition funding and the Biodiversity Funders Group. These partnerships would improve the successful longevity of pursued projects and better formulate the relationships necessary for future projects that may arise between the various entities.

2. What should EPA consider in the design of the program to ensure Greenhouse Gas Reduction Fund grants facilitate additionality (i.e., federal funding invests in projects that would have otherwise lacked access to financing)?

Given the considerable lack of economic resources in many low-income and disadvantaged communities, especially in Indigenous and Tribal communities, the EPA should consider regional focus areas where the communities mentioned above, which have traditionally been removed from such funding opportunities, would have prioritization for their projects. A regional focus would allow GGRF recipients with experience working within communities and specialized industry expertise to deliver funds more efficiently and maintain relationships with recipients/borrowers in order to maximize ROI and longer-term benefits. Many of the industries that ASBN and BCCA members participate in are rural, unique, and difficult to access, requiring such specialized knowledge and additional duty of care for loan/grant servicing.

3. What should EPA consider in the design of the program to ensure that revenue from financial assistance provided using Greenhouse Gas Reduction Fund grants is recycled to ensure continued operability?

To encourage long-term project sustainability, we suggest the EPA consider a public investment offering to fund a no-interest loan pool, handled primarily through the EPA in collaboration with other government agencies, to support the creation and development of sustainable and regenerative greenhouse gas reduction-focused projects throughout a variety of low-income and disadvantaged communities and small-capital, higher-emissions industries, especially sectors involved in food production, transportation, and low income housing. This would create healthy community participation and ensure the probability for low-income and disadvantaged communities to pursue their respective projects without fear of economic unsustainability. Because of the unique features and demands of Indigenous and low income communities and difficult-to-access industry segments, Green Banks housed at the state level should be supplemented with smaller institutions that can invest in staffing capacity and specialized knowledge necessary to offer fiscal support for these projects. For these reasons, we believe that the smaller-sized nonprofit Green Bank/CDFI model offers a great deal of promise for supporting projects in key communities.

4. What should EPA consider in the design of the program to enable Greenhouse Gas Reduction Fund grants to facilitate broad private market capital formation for greenhouse gas and air pollution reducing projects? How could Greenhouse Gas Reduction Fund grants help prove the “bankability” of financial structures that could then be replicated by private sector financial institutions?

We suggest the EPA consider tax credits, opportunity zones with additional criteria on transparency, accountability and community engagement, and guarantee programs, including those specifically targeted to Native-led efforts and small nonprofit Green Banks/CDFIs to facilitate broad private market capital formation. This approach would help to replicate the bankability process and build transferable and replicable expertise in Native-led organizations and efforts to provide support to difficult-to-access industries. Additionally, the use of CDFIs and revolving loans housed within associated capital facilities should be considered as a program design priority.

5. Are there best practices in program design that EPA should consider to reduce burdens on applicants, grantees, and/or subrecipients (including borrowers)?

To improve accessibility, we suggest the EPA consider developing and implementing a streamlined application process based on the practical feasibility of a project and its simplification in addressing greenhouse gas reduction accurately. EPA should consider removing match requirements for recipients targeting solely Indigenous and low-income community beneficiaries.

We also suggest the opportunity to set up an ombudsman office and or to work with private sector and NGOs with relationship with these communities to provide support in meeting the needs of the application process.

6. What, if any, common federal grant program design features should EPA consider or avoid in order to maximize the ability of eligible recipients and/or indirect recipients to leverage and recycle Greenhouse Gas Reduction Fund grants?

Similar to the above response, we suggest the EPA consider streamlining application and reporting processes to allow individuals, organizations, and Tribal communities unfamiliar with the process but needing monies for their respective projects, the added ability to participate. As above, consider waiving match requirements for recipients targeting solely Indigenous and low-income community beneficiaries.

7. What should EPA consider in the design of the program, in addition to prevailing wage requirements in section 314 of the Clean Air Act, to encourage grantees and subrecipients to fund projects that create high quality jobs and adhere to best practices for labor standards, consistent with guidance such as Executive Order 14063 on the Use of Project Labor Agreements and the Department of Labor's Good Jobs Principles?

The EPA should consider participatory input from the Economic Development Administration (EDA) regional planning measures in the grant award process. Furthermore, EPA should consider project implementation feedback from various Tribal Employment Rights Ordinances or Offices (TERO).

There is certainly an opportunity to mount educational programming through the Agency and collaborating with NGO intermediaries with solid relationships working with these communities to better enable their ability to understand and implement high quality jobs and adhere to best practices for labor standards

8. What should EPA consider when developing program guidance and policies, such as the appropriate collection of data, to ensure that greenhouse gas and air pollution reduction projects funded by grantees and subrecipients comply with the requirements of Title VI of the Civil Rights Act, which prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance?

EPA should consider local IIRB compliance and the inclusion of Free, Prior, and Informed Consent (FPIC) measures. The FPIC are specific rights pertaining to indigenous peoples and is recognized in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). It allows them to give or withhold consent to a project that may affect them or their territories. Once they have their support, they can withdraw it at any stage. Furthermore, FPIC enables them to negotiate the conditions under which the project will be designed, implemented, monitored, and evaluated. This is also embedded within the universal right to self-determination.

9. What should EPA consider when developing program policies and guidance to ensure that greenhouse gas and air pollution reduction projects funded by grantees and subrecipients comply with the requirements of the Build America, Buy America Act that requires domestic procurement of iron, steel, manufactured products, and construction material?

There is an opportunity through public/private partnerships to build out the “directory” of Build and Buy America supply chain partners, which should be prioritized in these programs.

10. What federal, state and/or local programs, including other programs included in the Inflation Reduction Act and the Infrastructure Investment and Jobs Act or “Bipartisan Infrastructure Law,” could EPA consider when designing the Greenhouse Gas Reduction Fund? How could such programs complement the funding available through the Greenhouse Gas Reduction Fund?

Regarding collaboration efforts, EPA should coordinate GGRF award programs with the Justice 40 Initiative, as it addresses environmental justice issues and its relationship to marginalized communities regarding climate issues. This collaboration further benefits the immediate need to address climate change and its devastating effects, especially for low-income and disadvantaged communities.

Currently, state and federal programs for emissions reductions awards directly to operators (e.g., DERA, REAP) leave significant gaps in coverage for emission reduction projects in difficult-to-access industries, particularly small food producers; the Greenhouse Gas Reduction Fund can help fill these gaps.

The DERA grants program consists of a national program, a Tribal program, and a state program. Expenses related to upgrading marine diesel engines represents an eligible expense within the national

program, the Tribal program, and at least seven state programs (Rhode Island, Massachusetts, New Hampshire, Maine, Connecticut, Florida, and Louisiana). DERA funding has been used in many of these places to help operators upgrade to Tier-3 and Tier-4 electronic engines that have lower particular matter and nitrous oxide emissions than the engines they replace. However, anecdotal evidence from multiple operators suggests that some of the state programs are difficult to take advantage of due to paperwork requirements and approval processes, and that the newer engines available through these programs are often not as reliable as the ones they replace. Eligibility requirements tend to be narrow, constraining vessel owners to adoption of specific technologies (e.g., Tier-3 and -4 diesel engines) rather than unleashing innovation and context-appropriate solutions.

The REAP program provides grants and guaranteed loans to install renewable energy systems and/or undertake energy efficiency improvements to agricultural producers and small businesses in rural areas or cities of less than 50,000 population. REAP-eligible recipients should be prioritized, and the program may serve well as a model for GGRF funds deployed to state-run Green Banks and other large programs.

At the state level, California's Carl Moyer Memorial Air Quality Standards Attainment Program provides funds to operators to retrofit, repower, or replace engines to gain extra emissions reductions. Alaska's Commercial Fishing Revolving Loan Fund provides funds to Alaska residents for marine engine fuel efficiency upgrades. These programs could receive GGRF support in the form of match waivers provided by nonprofit Green Banks/CDFIs in a revolving loan format.

11. Is guidance specific to Tribal and/or territorial governments necessary to implement the program? If so, what specific issues should such guidance address?

Yes. It is essential to create access to opportunities, develop allocations for non-governmental partners who can do work in the community, like community-led NGOs, and include additional communication pathways between the project teams and federal government agencies.

Section 3: Eligible Projects

1. What types of projects should EPA prioritize under sections 134(a)(1)-(3), consistent with the statutory definition of "qualified projects" and "zero emissions technology" as well as the statute's direct and indirect investment provisions? Please describe how prioritizing such projects would:

- a. maximize greenhouse gas emission and air pollution reductions;*
- b. deliver benefits to low-income and disadvantaged communities;*
- c. enable investment in projects that would otherwise lack access to capital or financing;*
- d. recycle repayments and other revenue received from financial assistance provided using the grant funds to ensure continued operability; and*
- e. facilitate increased private sector investment.*

EPA should prioritize projects that, as noted above, are sited in BIPOC and low-income communities, and projects that are associated with identified difficult-to-access industries. In the choice of projects to fund under GGRF, EPA should prioritize projects that achieve a balance of all four of the following objectives:

- Projects with the most significant GHG emissions reductions potential;

- Projects that would not be likely to occur without this funding, e.g., due to a lack of other available loan/grant programs or the inability for applicants to access them;
- Projects that provide social co-benefits, e.g. cost savings to disadvantaged communities, local jobs creation, energy resilience;
- Projects that avoid/reduce impacts to biodiversity, nature-based carbon sequestration potential, and land/ocean use, e.g., through reduction of waste, promotion of reuse/recycling, locating projects in the built environment or over impervious surfaces, etc.

To facilitate the effective distribution of grant monies, the EPA should focus on awarding projects that do not fall into offering false solutions, e.g., Carbon Capture, Utilization, and Storage (CCUS), a technique that captures, transfers, and stores carbon dioxide. While it stops some of the CO₂ from polluting, it ignores the root cause of climate change. It delays the transition to renewables and is more expensive than renewables. It promotes increased extraction and pollution of fossil fuels. Other false solutions include projects that may utilize carbon markets, burning of plastic (pyrolysis) biofuels, or liquefied natural gas. Avoidance of such false solutions would more appropriately allocate grant monies to projects that offer better and more sufficient solutions.

2. Please describe what forms of financial assistance (e.g. subgrants, loans, or other forms of financial assistance) are necessary to fill financing gaps, enable investment, and accelerate deployment of such projects.

To expedite the process of project deployment, we suggest the EPA consider regenerative financing and revolving loan programs as foundational elements for distributing program funds to most effectively solve systemic problems and regenerate communities and natural environments. As with above, we suggest that the EPA focus on additional grant development, no-interest loans, forgivable loans, and access to business consultants, experts, and learning cohorts to help facilitate the development and direction of projects within those low-income or disadvantaged communities.

3. Beyond financial assistance for project financing what other supports – such as technical assistance -- are necessary to accelerate deployment of such projects?

We suggest the EPA consider local/regional organizational collaboration with that of potential award grantees as a reasonable way to ensure project buy-in and success more appropriately. Many difficult-to-access industries operate within complex regulatory frameworks. State and federal requirements for management, permitting, operations, waste discharge, emissions, production reporting, taxation, liability, and other factors all weigh on these industry's stakeholders' decisions to invest in renewable technologies. In addition to supporting programs that provide capital, EPA should ensure that such programs are able to provide legal and regulatory confidence for their recipients in their ability to maintain high levels of compliance. This could entail providing fiscal support for in-house or outsourced legal or consulting services at Green Banks/CDFIs to support clients in this regard.

Section 4: Eligible Recipients

1. Who could be eligible entities and/or indirect recipients under the Greenhouse Gas Reduction Fund consistent with statutory requirements specified in section 134 of the Clean Air Act? Please provide a

description of these types of entities and references regarding the total capital deployed by such entities into greenhouse gas and air pollution reducing projects.

Following the statutory requirements specified in section 134 of the Clean Air Act, we suggest that Tribal Governments, Indigenous-led nonprofit organizations that work directly with Indigenous Peoples and tribal communities, BIPOC-led and allied organizations focusing on community development, and programs focusing on renewable energy technologies in difficult-to-access sectors of the small business economy be included as eligible entities to receive federal grant funding through the Greenhouse Gas Reduction Fund.

2. What types of entities (as eligible recipients and/or indirect recipients) could enable Greenhouse Gas Reduction Fund grants to support investment and deployment of greenhouse gas and air pollution reducing projects in low-income and disadvantaged communities?

Per the previous answer, providing funds to CDFIs focusing on Indigenous-led enterprise, low-income communities, and difficult-to-access small-cap industries would enable the expeditious distribution of federal grant funding directly to low-income and disadvantaged communities, mainly due to their longstanding connections to those communities through past collaborative projects. The efficiency of such a distribution of funds would benefit the respective communities greatly; for many, time is of the essence in addressing the climate challenges they are experiencing.

3. What types of entities (as eligible recipients and/or indirect recipients) could be created to enable Greenhouse Gas Reduction Fund grants to support investment in and deployment of greenhouse gas and air pollution reducing projects in communities where capacity to finance and deploy such projects does not currently exist?

In difficult-to-access industries and communities with increasing capacity, new CDFIs may be necessary in order to equitably and broadly distribute GGRF resources. These entities should be eligible for GGRF funding. We suggest that EPA consider creating local, place-based partnership initiatives with similar goal-based organizations/foundations in close (or the closest) physical proximity to the grantee's proposed project area in order to diversify delivery of funding across communities and geographies to organizations with diverse track records. This collaborative approach would help to fully develop the initiatives, empower new existing collaborations, build capacity and create an inclusive process, and initiate collaborative processes between the entities in the future.

As with our partnership with DOI (as announced by Secretary Haaland on December 2) to facilitate connections between the social investment community and Indigenous-led enterprises and communities, ASBN is well-positioned to engage with EPA in this capacity.

4. How could EPA ensure the responsible implementation of the Greenhouse Gas Reduction Fund grants by new entities without a track record?

Consistent with the above comment, regulatory measures and responsible implementation of GGRF grant projects for grant recipients without a track record would be better situated due to their collaboration with

established organizations/foundations. EPA could evaluate a new entity based on its partnership and participation in any number of established organizations or these new regional consortia, or it could dedicate funds specifically for geographies, communities, or difficult-to-access sectors of the economy that recognize the need for newer institutions.

5. What kinds of technical and/or financial assistance could Greenhouse Gas Reduction Fund grants facilitate to maximize investment in and deployment of greenhouse gas and air pollution reducing projects by existing and/or new eligible recipients and/or indirect recipients?

EPA should support access to technical assistance and improve outreach for federal funding opportunities alongside fiscal programs. Many Native Nations and low-income communities do not have access to existing grants or technical assistance in areas like the Department of Energy's Office that would support the strategic planning and development of renewable energy projects in their community/industry. Further, not all communities/Tribal governments have the physical, governmental, or organizational infrastructure to take on these funds. There is a lot of groundwork that needs to be done in these communities that is continuously overlooked by the federal government. The Biden-Harris Administration must work with community representatives to create capacity for technical assistance, to understand and troubleshoot available grants, and invest in capacity to promote grant and funding opportunities in multiple languages and through various platforms. Each federal agency and GGRF grant-issuing entity must devote long-term resources and staff towards working one-on-one with individual Tribal Nations to help them achieve the institutional, legal, and human capital foundations to make the most out of future funding and capital opportunities. Native Nations and entrepreneurs alike emphasize the dire need for deep and long-term capacity building services to do meaningful development. This improves our ability to make decisions that focus on smart innovation and growth to address issues affecting our world's climate.

Section 5: Oversight and Reporting

1. What types of governance structures, reporting requirements and audit requirements (consistent with applicable federal regulations) should EPA consider requiring of direct and indirect recipients of Greenhouse Gas Reduction Fund grants to ensure the responsible implementation and oversight of grantee/subrecipient operations and financial assistance activities?

Due to the enormous scope that some of the projects may entail, we suggest that the EPA consider the development of a diverse governing body that includes a variety of individuals from different cultural and career backgrounds, but which are all centered on their understanding of issues encompassing greenhouse gas reduction and climate change. Grantees would also benefit from requirements that align with those of other federal government programs that are effectively granting and lending to Indigenous-led organizations and initiatives to minimize duplication of efforts. EPA should ensure that grantmaking, audit, and reporting requirements are simplified (using common/existing criteria to the maximum extent possible), and to prioritize clear communication about requirements with recipients at the earliest opportunity.

2. Are there any compliance requirements in addition to those provided for in Federal statutes or regulations (e.g., requirements related to administering federal grant funds) that EPA should consider when designing the program?

(No comment)

3. What metrics and indicators should EPA use to track relevant program outcomes including, but not limited to, (a) reductions in greenhouse gas emissions or air pollution, (b) allocation of benefits to low-income and disadvantaged communities, (c) private sector leverage and project additionality, (d) number of greenhouse gas and air pollution reduction projects funded and (f) distribution of projects at the national, regional, state and local levels?

EPA should develop standardized guidance for GGRF recipients and subgrantees to estimate greenhouse gas emission reduction potential for proposed projects and to audit accomplishments. These tools should include Scope 1 and Scope 2 emissions. Such tools should be user-friendly, easy to operate, and universal. EPA should encourage granting/loan-providing institutions to provide technical support for these auditing requirements.

Additional metrics could include:

- Number of quality jobs created
- Energy bill savings for low-income households and/or community-based organizations; amount of CO₂e fuel dollars saved
- Number of low-income households/small businesses served
- Project profits re-distributed to community residents or community-based organizations
- Change in revenue generated by small businesses
- Amount of regenerative capital retained by program recipient

4. What should EPA consider in the design of the program to ensure community accountability for projects funded directly or indirectly by the Greenhouse Gas Reduction Fund? What if any existing governance structures, assessment criteria (e.g., the Community Development Financial Institutions Fund's Target Market Accountability criteria), rules, etc., should EPA consider?

EPA should consider measures ensuring public transparency of reporting to ensure accountability not only to EPA but their communities. This transparency can also serve as a knowledge sharing opportunity of work done under the program to others to encourage broader participation as the program grows.

Section 6: General Comments

1. Do you have any other comments on the implementation of the Greenhouse Gas Reduction Fund?

We appreciate that the EPA has issued this RFI, and urge you to heed our and other stakeholder input to design and implement the Greenhouse Gas Reduction Fund in a manner that directly benefits low-income and disadvantaged communities, small businesses operating in difficult-to-access industries, and leverages opportunities to engage the regenerative capital community for the benefit of all.

Sincerely,

A handwritten signature in cursive script that reads "David Levine".

David Levine
President & Co-Founder
ASBN

/s/

Marissa Mercurieff
Steering Committee Chair
BCCA