

TCC Draft Round 5 Program Guidelines

Key Changes and Policy Discussion Document

November 21, 2022

Action:

Members of the public are requested to provide written public comment on the recommendations found in this document by December 21, 2022.

Summary:

The California Strategic Growth Council (SGC) invites public comment on the Round 5 FY22-23 Transformative Climate Communities (TCC) Draft Guidelines and this supplementary Key Changes and Policy Discussion Document. The Key Changes document contains a summary of the significant changes in Round 5, as well as additional proposals that TCC staff may adopt in the Final Guidelines. Comments will inform the Round 5 FY22-23 TCC Final Guidelines, which are expected to be released in February 2023.

Deadline:

The public comment period for the Round 5 FY22-23 TCC Draft Guidelines ("Draft Guidelines") is November 21, 2022 – December 21, 2022. The team requests written comments on the Draft Guidelines and the additional proposals in this Key Changes and Policy Discussion document by December 21, 2022.

Address for Comments and Questions:

Interested parties may submit comments on the Draft Guidelines via email to the TCC inbox, TCC@sgc.ca.gov. Comments should include references to the specific sections of the Draft Guidelines. SGC staff will also be hosting virtual drop-in sessions for stakeholders to have time for direct conversations on any topic of their choice. These dates will be announced through the program's announcement list. To stay informed on the guideline update process and the TCC Program overall, please register for the [TCC News & Update Announcement List](#).

Background:

SGC updates the TCC Guidelines after each round of funding based on stakeholder input. These updates adapt the program to changes in legislation and current events, improve the program's accessibility and inclusivity, and advance the program's objectives. As part of the TCC Guidelines updates, TCC staff is seeking public comment on the proposed changes under consideration.

A draft version of the Round 5 FY22-23 TCC Guidelines ("Draft Guidelines") has been released for public comment. This document summarizes the major changes in the draft document and details additional proposals for potential incorporation into the Round 5 FY22-23 TCC Guidelines updates. The document is organized into a detailed list of the changes being considered, organized and numbered by its respective section in the Draft Guidelines.

Public comment is not limited to the following topics and the public is encouraged to comment on any content in the Draft Guidelines and supplementary materials. All stakeholder comments on the topics described in this memo will be considered but may not be reflected in the Round 5

FY22-23 TCC Final Guidelines. The Round 5 FY22-23 TCC Guidelines will be released ten days prior to their consideration by the SGC at the February 2023 Council Meeting.

Detailed Proposed Changes:

The following changes are concepts being evaluated by TCC staff to address the issues identified through the public engagement process. TCC staff is not proposing to implement all of the listed options. In some cases, TCC staff have proposed multiple options and are soliciting input on which options would be preferable. TCC staff may also make additional changes between the Draft and Final Guidelines that have not been proposed here.

Priority Populations: Disadvantaged Unincorporated Community Investment Framework (Sections 5.4 and throughout)

TCC's Round 4 Guidelines built out an investment framework for Disadvantaged Unincorporated Communities (DUCs) in response to Senate Bill 351 (Hurtado, 2019). The changes to the Round 4 Guidelines included:

- Expanded project area eligibility to DUCs and providing several options for establishing the DUC eligibility of a particular area. This included the development of a spatial analysis tool, as well as the option of submitting local data to establish project area eligibility for DUCs
- Technical assistance set aside for DUC communities in TCC Rounds 4-6
- The option to allocate up to 10% of requested funds to support projects that will connect residents to basic environmental infrastructure, including water and wastewater services

Draft changes: Round 5 builds upon this work by increasing the program's accessibility and utility for DUCs. Proposed changes include:

- *Offer Project Development Pilot Grant.* The new grant type would explore bridge funding and support for communities who do not have shovel ready projects. Predevelopment costs have been identified as a particular barrier for DUC communities (see Section 3. Project Development Grant Pilot in this document or Draft Guidelines)
- *Expand Project Area Eligibility Requirements to accommodate the development patterns in rural DUCs* (see Section 6.4. Project Area Eligibility in this document or Draft Guidelines)
- *Allow construction on prime agricultural land for unincorporated areas and areas within federally-recognized tribal boundaries.* Projects must demonstrate location efficiency (see Appendix B: Ineligible Project Characteristics and Costs in this document or Draft Guidelines)
- *Expand project Strategy 5: Water Efficiency.* The new project strategy would include "Water Infrastructure Resiliency Projects" as an eligible activity under the "Holistic water efficiency and resiliency upgrades" project type (see Appendix B.5: Water Efficiency and Resiliency in this document or Draft Guidelines)

Other proposals under consideration:

- *Re-examine Greenhouse Gas (GHG) Emissions Reductions scoring for rural applicants.* Consider separate sliding scale for rural applicants. Would need contingencies for cycles with few or limited rural applicants, (Section 9.6 Program Thresholds and Scoring Criteria: Project Implementation Grants)

- *Incentivize funding in jurisdictions with a commitment to climate resilience (e.g., climate action plan), Environmental Justice element, neighborhood mobility plans, or other plans that advance sustainability and equity.* Consider awarding higher points for planning consistency or Climate Action and Resilience Plan for applications that identify projects related to implementing these existing plans (9.6 Program Thresholds and Scoring Criteria: Project Implementation Grants)

Priority Populations: California Native American Tribes (Sections 5.4 and 11)

Draft changes: The Draft Guidelines contain several places where additional flexibility has been added for California Native American Tribes, with the option to request modifications to certain requirements on a case-by-case basis, with justification, including:

- Public Agency Formal Resolution at the time of application (see Section 6.1 Applicant Eligibility: Public Agency Support)
- Collaborative Stakeholder Structure (see Section 6.2. Collaborative Agreements)
- Modifications to Project Area requirements (see Section 6.4 Project Area Eligibility)
- Certain application materials may be replaced with alternative materials to protect data sovereignty (see Section 8. Application)
- Indirect Cost rates (see Section 8.3. Cost Breakdowns)
- Displacement Avoidance Plan requirements (see Section 8.5. Transformative Elements)

Requested feedback:

- Feedback is requested on all changes above, as well as any other areas where changes are needed to better serve California Native American Tribes
- Beginning in Round 4, “all areas within federally-recognized tribal territories,” which “includes all areas within federally recognized tribal boundaries in California, particularly tribal land held in trust and restricted fee lands,” became automatically eligible as a Project Area. Feedback is requested on whether this language should be modified in Round 5

4. Project Development Grant Pilot

Draft change: TCC staff is piloting a new grant type in Round 5, to address the funding gap between Planning and Implementation. The Draft Guidelines outline the new grant type’s objectives and eligible activities. The Draft Guidelines propose awards of up to \$7 million each to fund project development activities (predevelopment, basic environmental infrastructure, and capacity building) that are aligned with the TCC objectives and program framework.

Requested feedback: TCC staff welcomes input on how to make this pilot grant framework meaningful and responsive to the needs of communities facing barriers to implementation.

6.1 Applicant Eligibility: Eligible Lead Applicants

Draft change: Update the Eligible Lead Applicant section to specify that a corporate entity not meeting the definition of community-based organization may only serve as a Lead Applicant if the Applicant provides justification that this is the best path to carrying out a community’s vision for transformation and build long-term capacity.

6.1. Applicant Eligibility: Public Agency Support

Draft changes: TCC staff have made the following changes to the Draft Guidelines to clarify requirements for public agency support:

- Provided additional guidance on the types of agencies that should be involved in an Application
- Clarified that California Native American Tribes may submit a letter from a member of the Tribal Council instead of a formal resolution at the time of application, though the resolution will still be required before any awards can be made

6.2. Collaborative Agreements

Draft change: Updated the requirement for a Memorandum of Understanding (MOU) for Planning Grant Applications in cases where a Project Area crosses municipal boundaries, federally recognized tribal territory boundaries, or similarly relevant jurisdictional boundaries:

- Letters of Commitment from each relevant public agency can replace a draft, signed MOU at the time of application. However, an MOU will be required before the grant is executed

6.4. Project Area Eligibility

Draft changes: TCC staff have proposed the following changes to expand project area eligibility for rural applicants:

- *Expand project area cap to 10 square miles for rural applicants.* Rural applicants are defined using the definition set for by the CA Health & Safety Code § 50199.21 (2017)
- *Replace the density threshold requirement for disadvantaged unincorporated communities (DUCs).* Round 4 Guidelines state that the entirety of a Project Area meet a density threshold of 250 parcels per square mile. Round 5 proposes that the Project Area contain at least one such cluster, but that the threshold need not apply to the entire project area; this applies specifically to unincorporated communities that use eligibility option that relies on a combination of CalEnviroScreen, the California Hard-to-Count Index, and parcel cluster layers to qualify

Other proposals under consideration:

- *Allow investment outside of the Project Area for rural applicants.* Investment outside of the project area will be considered for rural applicants on a case-by-case basis with justification and approval from TCC staff, provided the investment directly benefits Project Area residents. These investments would be designed to accommodate development patterns in rural communities where key amenities, such as schools, may be located some distance from existing residences. All investments must be located within a boundary of 25 square miles.
- *Allow non-contiguous Project Areas.* Maximum area determined by:
 - All non-contiguous areas must fit within limited boundary of 25 square miles
 - Must have/show connectivity (existing or proposed through TCC) between all areas within the project area, including between a central hub (if applicable) and all proposed TCC projects. Ideally there would also connectivity between some or all non-contiguous Project Area sections.

Requested feedback:

- TCC staff welcomes input on suggested modifications to Project Area eligibility for rural communities, (including options not proposed here) that would account for local definitions of community, demonstrate connectivity, and be aligned with the TCC objectives
- As in Round 4, unincorporated communities who do not qualify under other TCC Project Area eligibility criteria will be able to submit local data to demonstrate that they should be designated as “disadvantaged” for the purposes of the TCC grant. What sources of local data (including qualitative and quantitative data) would be accessible and help applicants demonstrate that their community faces 1) a pollution or environmental burden and 2) socioeconomic factors designating the community as disadvantaged?

7.2. Program Policy Priorities: Implementation Grants: Air Pollution Reduction and Mitigation

In Round 4, the TCC Program added a scoring criteria intended to incentivize applicants to adopt policies and programs that reduced air pollution in their communities. Although air pollution remains a clear threat and priority issue in target TCC communities, the scoring criteria was not well-utilized in Round 4 and did not have the intended effect.

Requested feedback:

- TCC staff is soliciting input on potential ways to revise this incentive and scoring criteria. TCC staff especially welcomes input on how to effectively structure the incentive to achieve the intended impact of reducing air pollution in the most pollution burdened communities.

7.2. Program Policy Priorities: SB1000 Environmental Justice in Local Land Use Planning

In 2016, the California State Legislature passed Senate Bill 1000 (SB 1000) requiring local governments to identify environmental justice communities in their jurisdictions and address environmental justice in their general plans. Although TCC directs climate resilience investments to pollution burdened communities to support local efforts to address environmental justice, many policy levers are in local land use planning.

Requested feedback:

- TCC staff is soliciting input on potential ways to incentivize applicants from jurisdictions who have developed policies aimed at addressing environmental justice outlined in their general plan. Potential updates to the TCC Scoring criteria could include incentive points to applicants with strong Environmental Justice goals or policies as directed by SB1000. TCC staff welcomes input on how to effectively structure the incentive to achieve the intended impact of long-term goals and policies at the local level, aimed at addressing environmental justice.

8.3. Cost Breakdowns

Draft change: Increase the overall cost cap on Pre-Development costs from 5% to 10%

Other proposals under consideration:

- *Funding for peer-to-peer learning.* Based on recommendations from current grantees, staff is exploring ways to support the expressed desire for more peer-to-peer and knowledge share between grantees. TCC staff is considering a possible budget requirement, which would fund travel costs and staff time to engage in peer-to-peer learning

8.4 Strategies and Projects: Implementation

The TCC Program currently requires Project proposals to fall within existing Strategies and Project Types outlined in the Guidelines and Appendix B. This is tied to the current structure for the program's statutory reporting requirements, but TCC staff have been able to introduce new project types in each successive round and are interested in ways to further add flexibility to support innovative community projects.

Other proposals under consideration:

- *Expand TCC Project Types and Structures.* TCC staff is exploring ways to allow applicants to develop climate resilience projects that address community need but may not fall within the listed strategies and project activities. For example, combining multiple strategies within a project or expanding the menu of strategies or project types.

Requested feedback: TCC staff welcomes input on how to make the resilience strategies and projects meaningful and responsive to innovative solutions proposed by communities (See: 7.4 Strategies and Projects: Implementation, as well as Appendix B: TCC Funded Projects by Strategy).

8.5. Transformative Elements: Workforce Development and Economic Opportunities

Draft changes: Updated to align TCC policies with the State's workforce priorities on job quality, equity, and climate resilience and offer applicants additional resources for designing plans.

Other proposals under consideration: The TCC Program is also examining the following cost and reimbursement structures:

- Programs with trainee "stipends," eligible for 85-100 percent reimbursement
- Programs with trainee "wages," capped at 50 percent, including six (6) months of benefits

Requested feedback: Feedback and information on existing reimbursement structure benefits and challenges are welcome.

8.5. Transformative Elements: Leverage Funding

The TCC Program currently includes a requirement that all Implementation Grant applicants leverage additional funding sources that equate to at least 50% of the total grant award. The statutory requirement for leverage is intended to catalyze additional investment to disinvested communities. However, TCC staff have heard from applicants and awardees that the current thresholds for leverage funding can create hurdles. In response, TCC staff is proposing the following changes.

Draft changes:

- *Increase the portion of leverage funding dedicated to stand-alone leverage projects.* In Rounds 3 and 4, 80 percent (80%) of the required leverage funding was required to be dedicated to TCC-funded Projects or Transformative Plans, while the remaining 20 percent (20%) could fund Stand-Alone Leverage Projects. In Round 5, TCC staff proposes increasing the portion of Stand-Alone Leverage Project funding to no more than 50 percent (50%) of the required leverage funding commitment (i.e., no more than 25 percent of the total Grant Funds requested). No less than 50 percent (50%) of the leverage funding commitment must still be dedicated to TCC-funded Projects or Transformative Plans
- *Expand the award and expenditure timeline for leverage funds.* In previous rounds, leverage funding has only counted towards the 50 percent (50%) threshold if it occurred after the TCC grant had been awarded. For Round 5:
 - Leverage funds expended after the grant has been awarded and before the end of the grant term will remain eligible with no additional requirements
 - Applicants may satisfy up to half of their total leverage requirement (equal to up to 25 percent of the requested TCC funds) with leverage funds that were awarded or expended up to one year prior to the TCC application deadline, if the applicant can demonstrate that the leverage-funded projects are aligned with the TCC Program Objectives and the Community Vision of the TCC Proposal, resulted from a community planning process connected to the development of the TCC Proposal, and comply with the TCC Program requirements for meaningful community engagement

Other proposals under consideration:

TCC staff recognizes that even these modified leverage requirements may still be difficult to meet for some under-resourced and disinvested communities. With the intention of right-sizing the leverage requirement, TCC staff is also considering the following proposals:

- Use the population size of relevant jurisdictions to scale leverage requirements (i.e., high population application areas would be required to meet a higher total leverage requirement compared to applications with a lower total population)
- Use jurisdictional budgets to calculate the leverage requirements for each application
- Integrate consideration of previous good faith attempts to access other grant funding sources

Requested feedback: TCC staff requests feedback on the following topics:

- Proposed changes to the leverage funding requirements
- Other proposals under consideration, including suggestions for implementing alternative or scaled leverage funding requirements in an equitable and feasible way

10.3. Disbursement and Accounting of Funds: Advance Pay

Draft change: TCC has been authorized for an Advance Pay Pilot program (AB 156) through July 1, 2025. Lead Grantees will be able to request and disburse advance pay to subrecipients.

Requested feedback: TCC staff seeks feedback on potential guidelines or administrative considerations for the Advance Pay Pilot program, based on previous experience and/or need.

Appendices

B: Ineligible Project Characteristics and Costs

Draft change: Projects that result in a net loss or conversion of agricultural or other working lands, or natural resource lands for other uses are ineligible unless the project is within a DUC or federally-recognized tribal boundaries. Proposals must demonstrate proposals demonstrate (i) that construction on prime agricultural land would not have an adverse impact on the region's agricultural, labor, environmental, or economic resources, and (ii) that the proposal does not contradict the state's Planning Priorities, including promoting infill development, preserving agricultural lands, and encouraging location and resource-efficient new development. This exception does not apply to projects under Strategy 1: Equitable Housing and Neighborhood Development, which are subject to Affordable Housing and Sustainable Communities (AHSC) Program Guidelines.

B.1: Equitable Housing and Neighborhood Development

Other proposals under consideration: TCC's Strategy 1: Equitable Housing and Neighborhood Development currently funds affordable housing per the Affordable Housing and Sustainable Communities Program Guidelines. TCC staff recognizes the need for additional, alternative housing types and models as well as the potential opportunity to incorporate other existing housing programs.

Requested feedback: TCC staff requests feedback for the following areas:

- Accessibility of the AHSC Program within the context of the TCC program and its prospective applicants
- Alternative housing types, models, and programs to incorporate into TCC's housing strategy

B.2: Land Acquisition for Affordable Housing

Other proposals under consideration: The strategy currently only funds land acquisition for affordable housing land uses, given the need for housing and existence of enforceable land use commitments. Staff recognizes the need for land acquisition for additional community benefit projects and is researching ways to fund those.

Requested feedback:

- TCC staff welcomes input on funding frameworks for land acquisition that would support community benefit projects, through Community Land Trusts or other means

B.3.1: Active Transportation

Requested feedback:

- TCC staff seeks to clarify whether there are budget constraints relating to utility relocation necessitated by the construction of active transportation infrastructure (EG. utility relocation required to construct new sidewalks). TCC staff does not recommend implementing a cost cap on utility relocation for infrastructure projects at this time, since the Caltrans Active Transportation Program (ATP), which is broadly similar and includes planning and implementation activities, does not specify a cap.

B.3.2: Transit and Rail Access

Draft changes:

- Removed low-emission vehicles as an eligible activity within project types
- Added California Native American Tribes as an eligible applicant

B.3.3: Car Sharing and Mobility Enhancement

TCC staff does not recommend including home Electric Vehicle (EV) charging in this strategy. EV charging infrastructure is already included as part of strategies 1, 3.2, & 10, and home energy upgrades are included in strategy 4.

Other proposals under consideration:

- Caltrans & the California Energy Commission (CEC) is implementing the federal National Electric Vehicle Infrastructure (NEVI) program that will expand EV infrastructure over the next 5 years. TCC staff recommends aligning policy regarding EV charging infrastructure with NEVI deployment plan (to be published in Q1 2023) for future rounds of TCC Guidelines updates.

B.4: Solar Installation, Energy Efficiency, and Appliance Electrification

Draft changes: Updates to the Draft Guidelines eliminate a solar PV system size limit to permit the installation of systems that meet and/or exceed a dwelling's annual electrical usage (within certain limitations), clarify eligible equipment and repair costs, and incorporate new requirements for appliance electrification.

Requested feedback: TCC staff requests feedback on the current draft changes and additional proposals under consideration:

- *Solar PV system size.* Staff welcomes input on the program allowances for system size based on future projected household electrification and energy loads, while accounting for right-sized solar systems that do not generate excessive surplus unused energy.
- *New requirements to minimize potential utility bill impacts,* such as requiring energy efficiency upgrades and solar to be paired with electrification activities
- *Expand eligibility to include public, nonresidential buildings.* TCC staff is considering revising this eligibility and is requesting feedback on types of public, nonresidential buildings that could benefit and better support their communities with resources from this strategy. Activities under this strategy are closely tracked and quantified for their greenhouse gas reductions using California Climate Investments Quantification Methodologies. Nonresidential dwellings are currently not eligible to receive services from this strategy, and do not have an existing quantification methodology.
- *Inclusion of additional energy services.* TCC staff welcomes feedback around the inclusion of additional energy services – such as community solar and community energy storage – into the Draft Guidelines that benefit communities at large and serve residents that are not homeowners.

B.5: Water Efficiency and Resiliency

To increase accessibility of the program to DUCs, TCC staff proposes expanding Strategy 5: Water Efficiency to encompass resiliency and sustainability of water access for residents.

Draft changes:

- Include *“Water Infrastructure Resiliency Projects”* as an eligible activity under the *“Holistic water efficiency and resiliency upgrades”* project type. This would expand fundable project types to actions that adapt or implement water infrastructure to accommodate climate change and includes drinking well impact mitigation for DUC communities
- Update the strategy name to *“Water Efficiency and Resiliency”* to capture change in fundable activities

Requested feedback:

- TCC staff requests feedback on eligible activities under the “Holistic water efficiency and resiliency upgrades” project type.
- TCC staff also welcomes input on specific project types and eligible costs that would be beneficial to communities under this strategy.

B.6: Recycling, Composting, and Waste Management**Draft changes:**

- *Combine sub strategies.* Roll 6.1 Organics Waste Reduction, 6.2 Recycling, and 6.3 Food Waste Prevention and Rescue into one circular economy project type that identifies inorganic and organic matter as new resources
- *Broaden eligibility for projects and inorganic and organic reutilization facilities*

Other proposals under consideration:

- TCC staff is continuing to evaluate changes for: additional readiness requirements in the case of acquiring land; building or facility in terms of remediation and preliminary site assessments; and land acquisition as an eligible cost
- TCC staff is considering including biomass conversion facilities as an eligible project activity

Requested feedback: TCC staff requests feedback on the following topics:

- Inclusion of biomass conversion facility and air quality concerns
- Recommended readiness requirements for facility, building, and/or land acquisition

B.7: Urban Greening and Green Infrastructure**Draft changes:** The strategy-specific readiness requirements have been updated to include:

- *Selected species must be appropriate not only for the region, but for specific sites.* The requirement for a detailed Tree and Plant Species List approved by a certified expert (e.g., certified arborist, landscape architect) will remain the same, with the additional specification that tree and plant species must be appropriate for the selected sites
- *The Operations and Maintenance requirement for urban greening projects should include clear maintenance plans for 3 years.* Applicants should include evidence of adequate long-term maintenance plans for tree lifespans beyond the grant term

Other proposals under consideration: TCC staff is considering several proposals for additional strategy-specific readiness requirements:

- Urban Greening projects should demonstrate sustainable water use. Proposals for demonstrating sustainable water use include:
 - Projects should result in net zero increase of regional water usage.
Documentation that the projects will not result in a net increase of water usage could be provided by the Groundwater Sustainability Authority (GSA) in critically overdrafted areas in medium and high priority basins, and/or
 - Projects should be consistent with Groundwater Sustainability Plans for medium and high priority basins and should include letter of support or planning consistency from the GSA

Requested Feedback: TCC staff welcomes feedback on additional forms of documentation that could attest to sustainable water usage without creating unnecessary administrative burden on applicants

B.8: Health and Well-Being

Health and well-being projects have primarily focused on food access, and park, open space, and recreation access. Health equity, which addresses health outcomes beyond the limited project types currently listed within the Draft Guidelines, could have a considerable impact on the communities of interest within the TCC program. TCC staff is exploring a significant reframing of the entire strategy and the identification of areas of overlap to highlight health equity within the TCC program.

Other proposals under consideration: TCC staff is considering reframing the health equity strategy and expanding eligible activities:

- Planning Grants (Section 2)
 - Project area health indicator data incorporation through programs such as AB617, local health departments, and data collection activities
 - Community health needs assessment (CHNA) as fundable activity
- Implementation Grants (Appendix B, Strategy 8)
 - Rename strategy to Health Equity and Community Resilience, have collaborative sessions with partner agencies and stakeholders to right-size pilot projects
 - Incorporate health equity through weighted scoring throughout project types, thereby incorporating health equity into all projects
 - Potential pilot projects could include:
 - Funding creation of community resource centers, staffed by trusted community members (based on the promotoras model), which will help community members access public resources (SNAP, rental assistance, etc.), connect with TCC related projects and processes, and improve the relationship with the local government
 - Identify low-carbon, high health impact professions such as caretaking for workforce development programs

Requested feedback: TCC staff welcomes input on the proposals under consideration and on incorporating health equity through fundable activities and program framing.

B.10: Community Microgrids

Draft changes: To ensure effective and impactful investments (and prevent stranded assets), applicants who select the Community Microgrid strategy should conduct a process to determine whether a community microgrid is truly needed to provide energy resilience. Minor updates to this strategy include the addition of an online mapping tool to assist communities in determining whether project areas are located inside of a Tier 2 or Tier 3 fire threat district.

Other proposals under consideration:

- An additional readiness requirement for Applicants to provide a letter of support from their local utility
 - This requirement could help demonstrate project feasibility and coordination with utilities. California IOUs, such as the [PG&E Microgrid Enablement Program](#), work with communities to evaluate the feasibility of potential microgrid projects. However, not all IOUs may have established their resiliency teams to support microgrid development, and it would require a more substantial pre-application effort from certain Applicants
- Build a needs assessment into the Technical Assistance process with Applicants. This could facilitate the discussion of project feasibility between community members (who may identify the desire for a community-serving microgrid) and the technical assistance providers