

Public Comments Received for Environmental Financial Advisory Board

January 24-26, 2023 Meeting

Written Comments

- Growth Opportunity Partners
Michael Jeans, President and Chief Executive Officer
COMMENT: (attached)
- Mike Lehman
COMMENT: (attached)



January 17, 2023

VIA WWW.REGULATIONS.GOV

Andrew D. Sawyers,
Director, Office of Wastewater Management,
Office of Water
Environmental Protection Agency
Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: FRL-10506-01-OW Written Statements to the Public Meeting of the Environmental Financial Advisory Board (EFAB)

Growth Opportunity Partners, Inc. (Growth Opps) is pleased to provide comments to the Environmental Financial Advisory Board (EFAB) and Environmental Protection Agency (“EPA” or “the Agency”) pertaining to the design and implementation of the Greenhouse Gas Reduction Fund.

Growth Opps was created to make capital, professional quality advisory services, and data accessible to communities and groups of people who have been consistently excluded from meaningful investment. We offer community development capital, services and solutions to growing small businesses, primarily located in underserved, low and moderate income (LMI) communities in Ohio and throughout the country.

Our efforts at Growth Opps have been impactful.

- ❖ 84 percent (%) of our capital is deployed to Low- and Moderate-Income (LMI) Communities.
- ❖ 49 percent (%) of our capital portfolio is deployed to Minority and Women Owned Businesses.
- ❖ Post Growth Opps’ investment, jobs increased by 112% .¹
- ❖ Post GO capital infusion, African American clients increased their employee base by 87%.
- ❖ \$3,092,320 worth of Technical Assistance has been donated to entrepreneurs by GO Advisory Services.

¹ Based upon 2019 YTD client survey.



Growth Opps is proud to be owned, led and operated by Black/African American persons joined by allies of all backgrounds. Given the multiplier effect of our impact, particularly in and among communities of color, minority and women-owned entrepreneurs, and in job creation, we believe in the important and effective role of minority-owned and operated financial institutions in the success of their clients.

As such, our comments stress the importance of aligning the design and implementation of the Greenhouse Gas Reduction Fund with the Justice40 Initiative, established by Section 223 of Executive Order 14008.² This will address many of the historic and persistent issues of inequitable investment among green banks and the financial services community writ-large. Two priorities of the EPA's Justice40 Initiative speak directly to the program and design of the GHGRF:

1. Increase access to low-cost capital in Disadvantaged Communities (DACs).
2. Increase clean energy enterprise creation and contracting (MBE/DBE) in DACs.

As the first African American led Green Bank in the United States and a member of the green bank community through organizations such as the Coalition for Green Capital and the Consortium of Green Banks, Growth Opps is keenly aware of the history of inequitable deployment of capital within our community. We believe that with careful and thoughtful design and implementation, EPA can ensure that communities of color have access to meaningful investment through institutions owned, operated and led by members of that same community. Often, these organizations and the coalitions among them have submitted applications for competitive grants to service their communities, but have lacked meaningful connectivity to decision makers at the administrative level to ensure equitable deployment of competitive grant resources.

Accordingly, our perspective is that EPA should consider the GHGRF as a Covered Investment Benefit to Covered Programs as those terms are defined in the Interim Implementation Guidance ("Interim Guidance") for the Justice40 Initiative.³

Each of the three funding programs within the GHGRF fall within the scope of the Justice40 Initiative. As listed under the Interim Guidance, a "Covered Program" is a Federal Government program that makes a "Covered Investment Benefit" in specific program areas. A "covered program" refers to a federal government-sponsored investment designed to benefit disadvantaged communities across one or more issue areas including: *climate change, clean energy and energy efficiency*.⁴ The definition of a "covered investment" includes federal financial assistance in the form of federal grants, loans, credit, guarantees, or direct spending/benefits and may include

² Executive Order on Tackling the Climate Crisis at Home and Abroad. The White House. January 27, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

³ Memorandum For The Heads Of Departments And Agencies. Interim Implementation Guidance for the Justice40 Initiative. July 20, 2021. <https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>

⁴ <https://www.energy.gov/diversity/justice40-initiative>. Emphasis added.



fiscal year 2021 enacted appropriations, supplemental appropriations, prior year carryover from unobligated balances, and (when they become available) future fiscal year appropriations.

The statutory definition of a GHGRF Qualified Project under Section 134(c)(3) of the Inflation Reduction Act is

*any project, activity or technology that (A) **reduces or avoids greenhouse gas emissions or other forms of air pollution in partnership**, and by leveraging investment from, the private sector; or (B) **assist communities in the efforts of communities to reduce or avoid greenhouse gas emissions and other forms of air pollution.***⁵

The statutory requirements of a qualified project under the GHGRF - as a project that reduces or avoids greenhouse gases and assist communities with those efforts - fit squarely within the “covered program” definition of the Justice40 Initiative. In addition, the federal funding dedicated to the GHGRF in Section 60103 of the Inflation Reduction Act (IRA) fits squarely within the definition of a “covered investment” under the Interim Guidance for the Justice40 Initiative. As a result, we recommend that EPA institute a process for distributing the funds appropriated to GHGRF in accordance with EPA’s Justice40 Initiative. This means distributing the appropriated funds in a manner that empowers minority-owned and operated green banks and CDFIs to ensure an equitable deployment of GHGRF resources.

Section 60103 of the Inflation Reduction Act appropriates the funding amounts into three GHGRF programs according to the following:

Program	Amount	Minority-Owned Green Banks and CDFIs Set-Asides	Funding Mechanism
Zero-Emission Technologies	\$7 billion		Competitive Grants, Loans, Technical Assistance
General Assistance	\$11.97 billion		Competitive Grants, Loans, Technical Assistance
Low-Income & Disadvantaged Communities	\$8 billion		Competitive Grants

We propose that, in accordance with Justice40, which directs 40% of the overall benefits of certain Federal investments, the EPA should allocate 40% of each of the three funding buckets to minority-owned and operated green banks and CDFIs. Below are the minimum amounts that would be dedicated to such institutions.

⁵ Emphasis added.



Program	Amount	Minority-Owned Green Banks and CDFIs Set-Asides	Funding Mechanism
Zero-Emission Technologies	\$7 billion	\$2.8 billion	Competitive Grants, Loans, Technical Assistance
General Assistance	\$11.97 billion	\$4.788 billion	Competitive Grants, Loans, Technical Assistance
Low-Income & Disadvantaged Communities	\$8 billion	\$3.2 billion	Competitive Grants

Thank you for your time and attention to these comments. Calibrating the design and implementation of the distribution of the GHGRF within the Justice40 Initiative would provide much-needed support to financial service institutions that have historically well-served low-income, disadvantaged and primarily minority communities, but have not had access to federal funds for a variety of reasons. This is especially true for institutions whose built-in mission is to invest in businesses that are founded to reduce greenhouse gas emissions and address or avoid other forms of pollution, such as Growth Opps and other minority-owned and operated green banks.

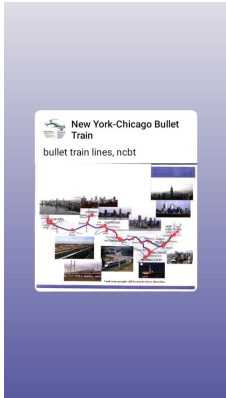
Sincerely,

Michael Jeans
President & Chief Executive Officer
Growth Opportunity Partners

From: [mike lee](#)
To: [EFAB](#)
Subject: Fwd: EPA-HQ-OA-2022-0859, RFI GHGRF
Date: Saturday, January 14, 2023 4:05:44 PM
Attachments: [image \(1\).png](#)
[image \(1\).png](#)
[image \(2\).png](#)
[image \(3\).png](#)
[image \(5\).png](#)
[5-22 sustainable solution for HSR.docx](#)

WRITTEN STATEMENT FOR EFAB JANUARY 2023 MEETING; Verified Icon
OA-2022-0859

Docket ID EPA-HQ-



Request for Information: Greenhouse Gas Reduction Fund (RFI GHGRF)

The NCBT network will stop millions of gallons of oil/gasoline/jet fuel from burning every day!, to reduce GHG...(SEE GRAPHICS AND EXPLANATION BELOW)

The New York-Chicago bullet train Network (ICRR row Illinois border to Keystone Corridor-Northeast Corridor~600 miles)

Facebook link email also: https://www.facebook.com/ncbt.org/photos/?ref=page_internal

New York-Chicago Bullet Train Network advocacy/NCBT
Contact: usbullettrain@gmail.com, more info:

An alternative global sustainable solution for HSR(bullet trains) in the USA; prevents burning billions of gallons of oil(transport fuels) yearly. The New York-Chicago HSR Network alignment eventually connects 120 major city pairs and over 100 million people on the Great Lakes & Northeast corridors!

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ECONOMIC REASONS: (only 5% of conventional world oil reserves are in the US, HSR Bullet train transport is all electric using domestic coal and other domestic energy resources)

1. This new electric Great Lakes Acela West important corridor system linking to the Northeast corridor/NEC interconnects more than 20 culture rich cities; 7 of the 10 largest and most important in the US. The new line would travel from Great Lakes cities through the Allegheny Mountains on to Philadelphia, New York City, Washington DC and the rest of the Northeast HSR(NEC/Acela) cities.
2. There would be new job creation generated by construction and then for continual operation and maintenance of the route(also, more good CBD/downtown jobs). Ridership levels should reach and exceed the levels of the similar French TGV bullet train ultimately. The French TGV, with over 50 million annual trips, has revenues of about \$5 billion a year.
3. With possible revenues of \$5 billion or more a year, the large investment in this line's infrastructure and train sets would be paid for realistically within several years' time, similar to the French TGV experience with their revenue streams financing and funding. Sustainable aviation intercity transport fees will be necessary also.
4. This new HSR bullet train route would augment and strengthen AMTRAK abilities and potential elsewhere on complementary routes and that of the Northeast corridor/Acela. Acela/NEC HSR utilization continues to grow and is AMTRAK'S most profitable and popular route.
5. This travel mode would enhance cities' CBDs and integrated rail developments

Proposed Phase 1 connected cities; Chicago, Cleveland, Pittsburg, and Philadelphia have and are expanding upon their own internal transit rail systems-cities not entirely reliant on autos!

SECURITY REASONS (True Bullet train HSR trains could evacuate an entire large city in 1-2 days!)

1. The airline transportation mode is more favored for terrorist attacks(hijackings, bombings, sabotage, poisonings etc.) Assaults are not as likely nor as catastrophic with this rail transportation mode-insurance companies, government and the public would welcome this.
2. This new mode of transport would not call for the necessary extreme expense and trouble of security, TSA, systems and additional equipment like the airline mode requires.
3. In the advent of an airspace shutdown again or bad weather the HSR corridors would serve

as another travel alternative to air/road travel in the northeast US and Great Lakes.

MOBILITY/HEALTH REASONS: (True HSR<10% the energy use of like air travel)

1. Tragically and very costly, in America about 50,000 people die and tens of thousands more are permanently disabled yearly from roadway related accidents (less driving=less deaths in USA). Hundreds more people are killed and severely injured yearly in intercity plane crashes too. In France and Japan, HSR Bullet trains have not had a passenger fatality in over 90 years combined. 100s of people and billions of \$\$ can be saved by using HSR bullet trains in lieu of personal vehicles and aircraft.
2. Most HSR right of way/ROW-infrastructure could be built adjacent to existing highways and railroad lines for environmental considerations and land use purposes (aircraft and road vehicles are much greater noise, air and land polluters and users).
3. Over 1/3 of all Americans don't like to fly, therefore leaving long, congesting, costly and hazardous auto/bus modes or intricate AMTRAK schedules as their only alternatives.
4. Airport traffic creates more pollutions/carcinogens/congestions around large population centers. There are a total of 8 potential congestion adding auto trips to and from airports to pickup and drop-off a flyer at both destinations per roundtrip. Combination rail/walking travel modes are much healthier and more beneficial rather than the customary airplane/automobile modes combinations.
5. This new dedicated HSR line would travel the 700 mile Chicago to Philadelphia length in 4-5 hours at 186+ mph speeds(which approaches short jet plane trip speeds) with only 3 stops in between (Cleveland, Pittsburg, and Harrisburg and?). Continuing on to DC, NYC or Atlantic City would add another 1-2 hours to the total overall trip departing the Chicago/Gary station eastbound. Sustainable electric HSR Bullet trains are an obvious alternative to new airports and aviation!
6. This mode of travel would be especially relaxing and enjoyable. The ability to personally move about, enjoy sights (especially in Pennsylvania), work, talk, read, eat and rest in a hassle-free, safe vehicle like a bullet train is truly unsurpassed. Indeed, elderly and ADA citizens would prefer this transport option to auto, bus and airplane travel also.

BENEFITS TO INDIVIDUAL STATES: (reduces airports' congestions also) (connected cities CBDs will gain significant tourist, business, and personal trip activity)

Illinois: The west end balance of the bullet train line linking the Chicago central business district (CBD) to 100 million + people. Chicago is positioned to reach another 30 million connecting travelers by all modes from adjoining states to its intercity rail system stations. Moreover, the line reduces the need for airport expansions as well as easing roadway congestions too!

Indiana: Gary, IN; the US geographic transport pinch point that filters most modes' traffic east and west in USA. Gary/Chicago airport/region development and more use of the South Shore/IC Railroad infrastructure. The suburban Gary/Chicago station would have multi-modal connections; airlines, commuter and HSR rail and major interstate highways.

Ohio/Michigan: (HSR has a dual purpose as transit trains in Chicago, Cincinnati and Detroit etc)

The midpoint of the corridor between Chicago and Philadelphia with additional connections originating from Detroit and also Columbus and Cincinnati into Cleveland.

Pennsylvania: Economic development of Pittsburgh and Philadelphia CBDs and connecting through the state capitol of Harrisburg which is also positioned in the state's mountain resort areas along with many other tourist and historic attractions. The advantages of two US HSR systems in the state; NSEW.

*Transportation is the leading cause of accidental and child deaths-each costing millions!

**This system would be a prudent, comfortable and safe mode of essential mobility that half the US could access, utilize and appreciate-a vital investment. The US should embrace developing and engineering this efficient, alternative transportation technology. 100s of millions of tourists visit all these connected cities annually from Chicago to NYC to Boston to Washington DC and in between, which means even more Bullet train passenger potential.

120 Major City Pairs total: combinations or connections of cities below with populations of 500,000 or more MSA (metropolitan statistical areas)

Chicago and New York Philadelphia Washington Boston Detroit Baltimore Pittsburgh Cincinnati Cleveland Columbus Indianapolis Providence Richmond Hartford Toledo/Ft Wayne(mi-oh-in station) and also 100< other major city combinations

Top State Population Ranking(2012)

*NCBT network connects 10 of 20 largest USA states

1 California 33,871,648

2 Texas 20,851,820

3 New York 18,976,457

4 Florida 15,982,378

5 Illinois 12,419,293

6 Pennsylvania 12,281,054

- 7 Ohio 11,353,140
- 8 Michigan 9,938,444

- 9 New Jersey 8,414,350
- 10 Georgia 8,186,453
- 11 North Carolina 8,049,313
- 12 Virginia 7,078,515
- 13 Massachusetts 6,349,097
- 14 Indiana 6,080,485
- 15 Washington 5,894,121
- 16 Tennessee 5,689,283
- 17 Missouri 5,595,211
- 18 Wisconsin 5,363,675
- 19 Maryland 5,296,486
- 20 Arizona 5,130,632

Largest US Metropolitan Statistical Areas MSA in USA

(*15 major connected cities after full build-out)

*NCBT network connects 11 of 30 largest USA cities

- 1) New York-Newark-Bridgeport, NY-NJ-CT-PA - 21,976,224*
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CONTACT INFO

+ Enter phone number

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MORE INFO

Release Date

2011

About

Impressum

A new alternative for bullet trains in USA; stops burning of billions of gallons of oil(transport fuels) yearly. The New York-Chicago HSR alignment eventually connects 120 major city pairs and over 100 million people on the Great Lakes & Northeast corridors!

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1. NCBT Network about summary
2. NCBT Network graphics and geography

RFI GHGRF (Greenhouse Gas Reduction Fund)

DOCKET NO. EPA-HQ-OA-2022-0859

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mike lehman
3639 n pine grove
chicago, il 60613

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mike lehman

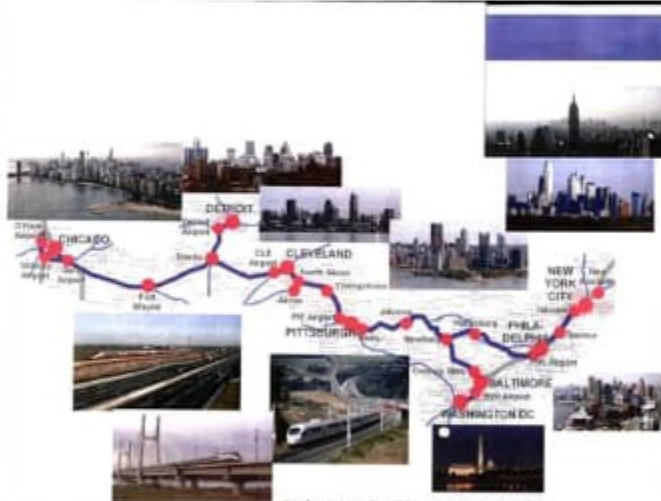
3639 n pine grove

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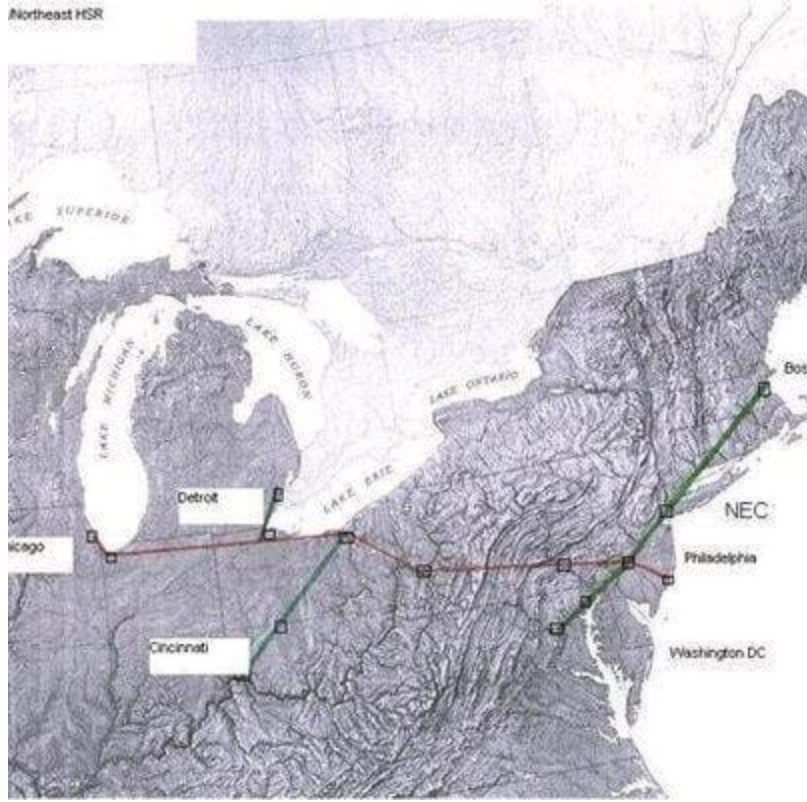


New York-Chicago Bullet Train

bullet train lines, ncbt



Northeast HSR





Key Endpoints: Fastest Trip

- Chicago-Gary Airport Local: 1 hour, 15 minutes
 - New York City Express: 4 hours, 20 minutes
 - Washington DC Express: 4 hours
 - Chicago-Philadelphia: 3 hours
 - Pittsburgh Regional: 3 hours, 40 minutes
 - Washington DC Express: 3 hours, 50 minutes
 - New York City Express: 4 hours
 - New York City Regional: 3 hours, 15 minutes
- Key routes

Other city pairs: Fastest

- Chicago-Cleveland: 2 hours
- Detroit-Cleveland: 1 hour, 5 minutes
- Detroit-Pittsburgh: 2 hours
- Chicago-Philadelphia: 3 hours, 5 minutes
- Detroit-Philadelphia: 3 hours, 30 minutes
- Cleveland-New York City: 3 hours
- Cleveland-Washington DC: 2 hours
- Detroit-Baltimore: 3 hours, 30 minutes

K. Prendergast-All About

Population Distribution

Where do we live?
Where don't we live?



The population of the United States is not distributed evenly. Instead, we tend to bunch up in communities, leaving the spaces in between more sparsely inhabited. Most Americans live in or near cities; today 53 percent live in the 20 largest cities. 75 percent of all Americans live in metropolitan areas.

This map shows population density. The relative height of each major city reflects its population in 1990.

Source: U.S. Census Bureau

Go West. Nevada is the fastest growing state, followed by Arizona, Idaho, Colorado, and Utah.

Wyoming has the lowest population density of all states in the lower 48 with an average of five people per square mile.

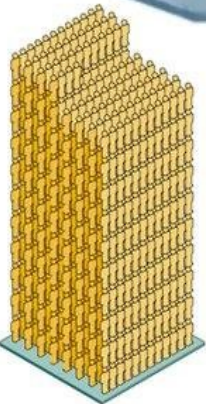
What happens in the empty spaces? Some of it is farming country. More than one quarter of America's crop land is used to grow corn. One third of what is produced is exported to other countries.

Chicago, the country's third largest city, has a population of about three million people. There are 21 states with populations smaller than this city.

Largest metropolitan area includes New York City and portions of New Jersey and Long Island with a total population of 20 million.

Population density is highest in New York City, where there are 23,000 people per square mile.

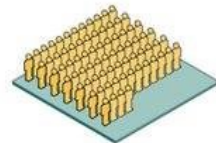
Approximately one in nine Americans lives in the nation's most populous state—California. More than 15 million people live in the Los Angeles, Riverside, and Orange County metropolitan area.



New Jersey is the most densely populated state with an average of more than 1,000 people per square mile.



Alaska is a sparsely populated state with an average of one person per square mile.



Distributing our population evenly would put an average of 76 people per square mile.

Wet. Some states are full of water. For example, Louisiana includes more than 8,000 square miles of lakes and wetlands. That's an area bigger than Connecticut and Rhode Island combined.

Coastal areas are home to more than half the U.S. population.

