

**Priority Climate Action Plan Guidance: An Outline for Tribes and Territories**

November 2023

#### **PREPARED FOR:**

State and Local Climate and Energy Program

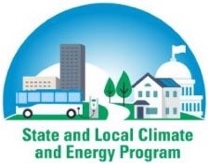
U.S. Environmental Protection Agency

#### **PREPARED BY:**

#### ICF

#### 2550 S Clark St. Arlington, VA 22202

#### Tel: (571) 842‐4500





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*This outline offers one approach to drafting a Priority Climate Action Plan. Tribes and Territories are not required to follow this outline or use its format. All submissions that meet the requirements of the Climate Pollution Reduction Grants program will be accepted, regardless of outline or format.*

# Purpose

This outline provides guidance to support U.S. Federally recognized Tribes and Territories developing their Priority Climate Action Plans (PCAPs) under the U.S. Environmental Protection Agency’s (EPA’s) Climate Pollution Reduction Grant (CPRG) Planning Grant Program. This draft outline was developed based on best practices identified by EPA through the Agency’s extensive work with Tribal and Territorial governments to support the creation of PCAPs. EPA recognizes that each Tribal and Territory government is an expert in its own community. EPA is sharing additional information and lessons learned for consideration to supplement this knowledge.

The PCAP will help Tribes and Territories to:

1. Improve their understanding of current and future greenhouse gas (GHG) emissions,
2. Identify priority strategies to reduce these emissions and the potential other benefits of those strategies, and
3. Engage a variety of stakeholders in an emissions reduction planning process.

The PCAP will inform the Comprehensive Climate Action Plan (CCAP), which is due at the close of the grant period for Tribes and Territories. This outline document pertains to both required and suggested content for the Tribal and Territorial PCAP only.

The EPA encourages Tribes and Territories to collaborate with each other and other entities (states, municipalities, etc.), explore opportunities to leverage other federal funds, and prioritize durable and replicable GHG reduction measures.[[1]](#footnote-2)

If you have any questions regarding this outline, please contact [CPRG@epa.gov](mailto:CPRG@epa.gov).

## Key Definitions and Acronyms

**Priority Climate Action Plan (PCAP):** a narrative report that includes a focused list of near-term, high-priority, and implementation-ready measures to reduce GHG pollution and an analysis of GHG emissions reductions.

**Comprehensive Climate Action Plan (CCAP):** a narrative report that provides an overview of the Tribe or Territory’s significant GHG sources/sinks and sectors, establishes near-term and long-term GHG emission reduction goals, and provides strategies and identifies measures that address the highest priority sectors to help the Tribe or Territory meet those goals.

**Greenhouse gas (GHG) Inventory:** a list of emission sources and sinks and the associated emissions quantified using standard methods. The PCAP must include a “simplified" inventory (see Section 3.1). The CCAP must include a comprehensive inventory of emissions and sinks for the following sectors: industry, electricity generation/use, transportation, commercial and residential buildings, agriculture, natural and working lands, and waste and materials management.

## How to Use this Outline

This outline is accompanied by a companion document, Priority Climate Action Plan: Helpful Resources for Tribes and Territories, which provides further resources and examples for each section of the PCAP example outline and should be used in tandem with this document.

In this outline, the term “Tribes” refers to and applies to single or multiple federally-recognized Tribe(s) and Tribal consortia eligible under the CPRG Planning Grant Program. The term “Territory” refers to and applies to the U.S. territories of Guam, American Samoa, U.S. Virgin Islands, and the Northern Mariana Islands.

This outline shares one approach that Tribes and Territories may use to draft their PCAPs. This outline is designed to be helpful, but it is not meant to be restrictive. Documents that meet submission requirements described in EPA’s [CPRG: Formula Grants for Planning, Program Guidance for Federally Recognized Tribes, Tribal Consortia, and U.S. Territories](https://www.epa.gov/system/files/documents/2023-02/EPA%20CPRG%20Planning%20Grants%20Program%20Guidance%20for%20Tribes-Tribal%20Consortia-Territories%2003-01-2023.pdf) will be accepted, and no specific format is required.

Sections of this outline may not reflect the local circumstances of each Tribe or Territory, thus Tribes and Territories are encouraged to modify and restructure the elements of this outline to accommodate their own local needs, goals, and knowledge, as necessary. Sections may be added or deleted, provided that the document still includes the elements required in a PCAP.

**Navigating Text**

**Headings**

## Subheadings

*Help Text*

* *Bulleted list*

*(Optional but Encouraged)*

***(Required)***

Headings and subheadings are indicated by large blue font and are numbered throughout the document. Tribes and Territories may use this text style directly if desired, but it is not required. Section headings are organized based on specific PCAP requirements. Unless a section heading is marked as optional, it stands in for a required PCAP element.

Help text is *italicized*. The help text describes the purpose and kind of information that may be included in each section of the document. Tribes and Territories are not required to follow the suggestions of the help text. All submissions which meet the PCAP requirements listed in the program guidance will be considered. Please delete all help text prior to submission.

Bulleted lists are used to describe the contents of specific sections. Not all PCAPs will need to address each point of a bulleted list, unless otherwise specified. Please delete any unused or irrelevant bulleted lists prior to submission.

PCAP elements that are optional, but encouraged, are indicated by *(red italics)* in parentheses. Tribes and Territories are not required to include these elements in their PCAPs. Required PCAP elements are indicated by ***bold blue italics***. Please delete all “optional” and “required” text prior to submission.

Examples and resources are noted in boxes. Examples come from Tribes and Territories across the U.S. engaged in existing climate action planning efforts, which may resemble components of a PCAP. Examples are included within this outline to inspire planning efforts and are not meant to be copied into individual PCAPs unless they are relevant for the specific Tribe or Territory. Please delete all examples prior to submission and refer to Priority Climate Action Plan: Helpful Resources for Tribes and Territories for additional examples and tools to support the development of each section in this outline. Please review all text for accuracy and relevance prior to submission.

# Tribe or Territory PCAP Title Page *(optional)*

*Customize this title page to include the name of your Tribe or Territory, the date, the PCAP authors, and contact information for the Tribe/Territory and/or authors. You may also include a photograph or logo if applicable.*

*This page may include the following disclaimer:*

*This project has been funded wholly or in part by the United States Environmental Protection Agency (EPA) under assistance agreement <number> to <recipient>. The contents of this document do not necessarily reflect the views and policies of the EPA, nor does the EPA endorse trade names or recommend the use of commercial products mentioned in this document.*

# Acknowledgements *(optional)*

*Use this space to acknowledge any collaborators (e.g., non-profits, municipal governments, community organizations, individuals), that were integral to the publication of the PCAP. This may have its own page.*

# Definitions *(optional)*

*Use this space to define any key terms used in the PCAP. This may have its own page.*

# Table of Contents *(optional)*

*A longer PCAP may benefit from a table of contents to help readers navigate various sections. The table of contents typically include primary headings, subheadings, and page numbers.*

# List of Figures *(optional)*

*A PCAP with multiple visual elements may benefit from a List of Figures. Figures can be photographs, illustrations, diagrams, graphs, charts, etc. Reports that include a List of Figures should include figure captions in the body of the report for each figure (e.g., Figure 1: Tribe’s GHG emissions over time). List figures by number along with their respective page numbers.*

# List of Tables *(optional)*

*A PCAP with multiple tables may benefit from a List of Tables. Unlike figures, tables display raw data in rows and columns. Reports that use a List of Tables should include table captions in the body of the report for each figure (e.g., Table 1: MWh energy usage per month in 2022). List tables by number along with their respective page numbers.*

# Executive Summary *(optional)*

*The Executive Summary should allow readers to understand the overall content of the PCAP without reading the entire document. This section may contain a high-level overview of the PCAP and any of the following elements:*

* *The purpose of the PCAP*
* *PCAP overview*
  + *Identifying PCAP team leadership*
  + *Identifying responsible agency/staff*
  + *Tribe or Territory specific considerations for PCAP (e.g., geographic constraints, existing emissions reductions strategies, special interests)*
* *PCAP elements and key takeaways*
  + *Developing a GHG inventory* ***(Required)***
  + *GHG emissions projections (optional)*
  + *GHG reduction targets (optional)*
  + *GHG reduction measures (priority measures, at a minimum, are* ***Required****)*
  + *Benefits analysis for each measure* ***(Required)***
  + *Review of authority to implement for each measure* ***(Required)***
  + *Funding opportunities beyond the PCAP (e.g., CCAP) for each measure (optional)*
  + *Workforce planning analysis for each measure (optional)*
* *Next steps* 
  + *High-level overview of the CCAP*
  + *Implementation steps*

*Please note that an Executive Summary may contain more or fewer elements than included in this list above.*

# Introduction *(optional)*

*The introduction section should provide the reader with enough background information to understand the following sections of the PCAP. It should provide the reader with some information about your Tribe or Territory (e.g., existing climate action plans, decision making structures) to better convey how the PCAP will meet your Tribe or Territory’s needs.*

## CPRG overview

*This section may include a brief overview of the CPRG process and could discuss the purpose of the PCAP or why your Tribe or Territory chose to participate in the CPRG program.*

## PCAP Overview and Definitions

*This section may include a brief overview of the PCAP along with definitions, methods used, and any challenges encountered for the PCAP elements listed below. Section 3 of the PCAP will include this information in greater detail. Additional information on the PCAP elements can be found in* EPA’s [CPRG Program Guidance for Federally Recognized Tribes, Tribal Consortia, and U.S. Territories](https://www.epa.gov/system/files/documents/2023-02/EPA%20CPRG%20Planning%20Grants%20Program%20Guidance%20for%20Tribes-Tribal%20Consortia-Territories%2003-01-2023.pdf).

* *GHG inventory* ***(Required)***
* *GHG emissions projections (optional)*
* *GHG reduction targets (optional)*
* *Quantified GHG reduction measures (priority measures only are* ***Required****)*
* *A benefits analysis* ***(Required)***
* *A review of authority to implement* ***(Required)***
* *Identification of other funding mechanisms (optional)*
* *Workforce planning analysis (optional)*

## Approach to Developing the PCAP

*This section may describe your team’s high-level approach to developing the PCAP which may include, but is not limited to the following:*

* *Identifying and engaging key stakeholders*
* *Understanding the GHG emissions inventory*
* *Establishing GHG reduction goals*
* *Identifying measures to reduce GHG emissions*
* *Prioritizing and selecting GHG reduction measures*
* *Estimating potential GHG reduction measure impacts*
* *Establishing an administrative process for measure implementation*

## Scope of the PCAP

*This section may describe the scope of your PCAP. This may include the geographic territory, timeline for planning and execution of plans, tribal/territorial decision-making methods, etc.*

# Tribal/Territorial Organization and Considerations *(optional)*

*This section could provide the reader with background information on the organizational structure of the PCAP management team and collaborators, along with Tribe- or Territory-specific considerations that may have an impact on the PCAP’s development and/or implementation. Alternatively, this information could be consolidated within the Introduction (Section 1).*

## The Tribal/Territorial PCAP Management and Development Team

*This section may describe the organizations involved in drafting the PCAP, which may include but are not limited to the following:*

* *Tribal/Territorial leaders*
* *Tribal/Territorial agencies (e.g., environment, natural resources, land use departments)*
* *Advisory committees*
* *Other groups, (e.g., third-party consultants, community-based organizations)*

*This section may include a description or explanation of the organizational structure and decision-making authority of the Tribal/Territorial PCAP Management and Development Team.*

## Special Considerations for Tribal/Territorial Entities

*This section may describe any Tribe or Territory-specific, culture-specific, and/or community-specific considerations that have an impact or influence on the tribal/territorial PCAP development and/or implementation. For the PCAP, you may describe how these considerations contributed to the selection of priority measures. These considerations may include, but are not limited to the following:*

* *Presence of sector-specific goals*
* *Existing GHG inventories or similar assessments*
* *Benefits quantifications*
* *Existing emissions reduction plans, programs, or strategies*
* *Authority and accountability structures or systems associated with emission reduction plans, programs, or strategies*
* *Cultural restrictions, geographic remoteness, land governance and/or need for special permissions that can impact emission reduction measures and strategies*

**Example:** [**Agaaciq Native Village Residential Woodstove Grant**](http://www7.nau.edu/itep/main/tcc/Tribes/ak_yupik_alg)

The Agaaciq Native Village in Western Alaska relies on wood-burning stoves to heat their homes over their long and harsh winters. Although wood stoves produce high levels of air pollution and carbon emissions, there are few residential heating alternatives available in rural Alaska. The Agaaciq Village received an EPA grant to replace 11 non-EPA compliant woodstoves with EPA-certified wood stoves and would like to replace more woodstoves. This Village faces unique challenges due to their geographic isolation and severe cold winter weather that may impact the focus of their PCAP’s GHG reduction measures.

## Collaborations

*This section could describe how your PCAP Management and Development Team worked with other entities/organizations to develop the PCAP. This information may also be included in section 1.3. These organizations may include but are not limited to:*

* *Individual tribal/territorial members*
* *Community organizations*
* *Local, state government, and federal government*
* *Private businesses*
* *Utilities*
* *Trade associations*

**Example:** [**Jamestown S’Klallam Tribe’s Carbon Neutral Plan**](https://jamestowntribe.org/wp-content/uploads/2023/05/Carbon-Neutral-Plan.pdf)

The Jamestown S’Klallam Tribe created a Carbon Neutral Plan in 2022 that highlighted the need to “invest in expanding traditional foods gathering and agricultural capacity.” Their Plan included partnering with local farms to create culturally appropriate community supported agriculture boxes, purchasing agricultural land to actively grow their own agricultural produce, and co-locating agricultural lands with solar renewable energy facilities. This plan integrated local businesses and community organizations into the broader tribal climate strategy for their mutual benefit.

**Example:** [**Guam Green Growth**](https://guamgreengrowth.org/)**’s Public-Private Partnership**

Created by the Governor of Guam through an executive order, the Guam Green Growth is a public-private partnership that develops tangible solutions to sustainability challenges and contributes to a green economy in the U.S. territory island of Guam. The 80-member working group comprised of government, academia, private sector, non-profit, and youth partners work together to transition Guam toward a sustainable future.

# PCAP elements

*Tribes and Territories can find more information about the PCAP requirements in* [EPA CPRG Planning Grants Program Guidance for Tribes-Tribal Consortia-Territories 03-01-2023](https://www.epa.gov/system/files/documents/2023-02/EPA%20CPRG%20Planning%20Grants%20Program%20Guidance%20for%20Tribes-Tribal%20Consortia-Territories%2003-01-2023.pdf). *Trainings on the PCAP elements and Q&A documents for each element can be found at* [CPRG Training- Tools and Technical Resources](https://www.epa.gov/inflation-reduction-act/cprg-training-tools-and-technical-resources)*.*



## Greenhouse Gas (GHG) Inventory *(required)*

*This section should provide a simplified GHG inventory for your Tribe or Territory, which may include the following sections:*

* *Scope*
* *Data collection*
* *GHG accounting method*
* *GHG emission results by sector and gas*

*A Tribal/Territorial inventory should document emissions from activities within the geographic boundaries specified in Section 1.3.*

*Tribes and Territories may use any available data (e.g., EPA’s National Emissions Inventory) to produce their inventories. If your Tribe or Territory has already produced a GHG inventory, you may use existing data. Make sure to provide a list of data sources used. An extended list of potential data resources and examples can be found in* Priority Climate Action Plan: Helpful Resources for Tribes and Territories*.*

*Provide a brief description of the methods used to estimate GHG emissions. Note that method selection may depend on the data available, and no one method is “correct”. There are several widely accepted methodological frameworks Tribes and Territories may use to estimate their greenhouse gas inventories, such as the Global Protocol for Community-Scale GHG Emissions Inventories or the Local Action Framework from EPA; see* Priority Climate Action Plan: Helpful Resources for Tribes and Territories *for more information. Tribes and Territories may select any reasonable base year given the availability of emissions data. A base year is the starting year for the historic inventory, and targets for GHG emissions are often defined in relation to the base year. When selecting a base year, consider:*

* *Do existing Tribal or Territorial goals, policies, or programs for emissions reduction specify a base year?*
* *Is the selected base year representative of general emissions patterns (e.g., not uncharacteristically high or low)?*
* *Are the data for this base year available?*

*The GHG inventory should include:*

* *Economy-wide anthropogenic emission estimates for primary GHGs (e.g., CO2 , CH4 , N2O, HFCs, PFCs, SF6 , and NF3)*
* *Emissions reported in CO2 equivalent units*
* *Both direct (e.g., power generation) and indirect (e.g., purchased electricity) emissions*

*The distinction between direct and indirect emissions may be derived from the Tribes or Territories authority or ability to reduce those emissions. For example, Tribes or Territories may categorize emissions from a tribe- or territory-owned power plant as direct emissions but categorize purchased power from outside their geographic boundaries as indirect emissions.*

*A comprehensive inventory of GHG emissions and sinks by sector and emissions projections are* ***not*** *required for the PCAP.*

**EPA Resource:** [**Tribal Greenhouse Gas Inventory Tool**](https://www.epa.gov/statelocalenergy/download-tribal-greenhouse-gas-inventory-tool?token=7NWnybonq2qnAglJwoAgt5SJg-5gFn8pxGdxZbGRZBM) **and the** [**Community Greenhouse Gas Inventory Tool**](https://www.epa.gov/statelocalenergy/download-local-greenhouse-gas-inventory-tool)

The Tribal and Community Greenhouse Gas Inventory Tools are Excel spreadsheet tools that both Tribes and Territories can use to calculate their own greenhouse gas inventories. These tools and their user guides can be found in the accompanying resource document.

**EPA Resource:** [**National Emissions Inventory**](https://awsedap.epa.gov/public/single/?appid=20230c40-026d-494e-903f-3f112761a208&sheet=5d3fdda7-14bc-4284-a9bb-cfd856b9348d&opt=ctxmenu,currsel)

The National Emissions Inventory (NEI) is a nationwide database of emissions estimates from air pollutants, including GHG emissions for select sectors. Tribes and Territories can access help documentation for downloading NEI data [here](https://www.epa.gov/system/files/documents/2023-10/nei_emissions-data_county_and_regional_guidance_9.6.2023-508c.pdf). More resources can be found Priority Climate Action Plan: Helpful Resources for Tribes and Territories.

**Example:** [**Gila River Indian Community GHG Emissions Inventory**](https://www.gricdeq.org/view/download.php/air-quality-program/user_file_17)

The Gila River Indian Community published a GHG Emissions Inventory in 2011 using emissions data from 2007 as a baseline year. See Section 2 above for an example and brief description of the methods used, and Sections 3-7 for example emissions calculations. Note that this inventory used various methods and approaches for the different sectors based on data availability.

## GHG Emissions Projections *(optional)*

*You may use this section to summarize GHG emissions projections. This information is optional for the PCAP but is required for the CCAP.*

## GHG Reduction Targets *(optional)*

*You may use this section to summarize GHG emissions reduction targets. This information is optional for the PCAP but is required for the CCAP.*

## GHG Reduction Measures *(required for priority measures only)*

*This section should provide a set of priority GHG reduction measures. Priority GHG reduction measures should be based on GHG emissions information and focused on achieving the most significant GHG reductions possible, while considering other relevant planning goals. GHG reduction measures may include both measures that reduce GHG emissions and/or measures that enhance carbon sinks. When drafting these measures, Tribes or Territories could consider the following:*

* *Do existing Tribal/Territorial goals or policies work towards emissions reduction? Can these be modified or expanded?*
* *How can Tribes or Territories measure or quantify anticipated GHG emission reductions from a proposed priority measure?*
* *Do Tribes or Territories currently have the authority to implement this measure? If not, can Tribes or Territories obtain authority in the near future or partner with the authoritative agency to implement this measure?*

*Tribes and Territories should include the following information for each GHG reduction measure:*

* *Estimate of the quantifiable GHG emissions reductions*
* *Implementing agency or agencies*
* *Implementation schedule and milestones*
* *Geographic location (if applicable)*
* *Milestones for obtaining implementing authority as appropriate*
* *Funding sources (if relevant)*
* *Metrics for tracking progress*
* *Applicable sector (e.g., solid waste management, electricity generation and consumption, agriculture and land management). One measure may apply to more than one sector.*
* *Quantitative cost estimates (optional)*

*See an example table of a priority emissions reduction measure below. Please note, this example does not include an implementation schedule, sector, or tracking metrics (only tracking milestones are shown), which are required for each GHG reduction measure.*

**Example:** [**Agua Caliente Tribe Energy Sector Measure 1--Install 80 kW Solar PV System**](https://www.energy.gov/indianenergy/agua-caliente-band-cahuilla-indians-2015-project)

|  |  |
| --- | --- |
| Implementing agency | Agua Caliente Band of Cahuilla Indians, City of Palm Springs |
| Implementation milestones | City of Palm Springs plan approval, construction start, construction end, interconnection agreement signed |
| Geographic location | Heritage Plaza building site, Palm Springs, CA |
| Funding sources | U.S. Department of Energy Grant |
| Metrics tracking | Published project overview, 2 status updates, and final report tracking construction progress |
| Cost | $240,000 |
| Annual estimated GHG and criteria air pollutant emission reductions | 37 tons carbon dioxide, 49 lbs. nitrous oxides, 21 lbs. sulfur dioxide |
| Implementation authority milestones | City of Palm Springs plan approval and permitting |

*A list of example priority emissions reductions measures is available in the* Priority Climate Action Plan: Helpful Resources for Tribes and Territories*.*

## Benefits Analysis *(required)*

*This section should provide a benefits assessment of the GHG reduction measures included in the PCAP. The assessment should include estimated co-pollutant reductions of criteria air pollutants and/or precursors (e.g., particulate matter under 2.5 micrometers, nitrogen oxides, sulfur dioxides, volatile organic compounds), and air toxics or hazardous air pollutants (e.g., benzene, toluene, perchloroethylene) for each measure. Tribes and Territories should specify the base year estimates of each co-pollutant, including criteria pollutants (and/or precursors), air toxics, or hazardous air pollutants. Tribes and Territories may not have access to specific tribal/territorial data for co-pollutants but can meet minimum requirements by using EPA’s National Emissions Inventory to source data for any counties that overlap tribal jurisdictions. For more information about NEI, see Priority Climate Action Plan: Helpful Resources for Tribes and Territories*

*Tribes and Territories may also choose to include a broader assessment of benefits (e.g., improved air quality) and disbenefits (e.g., the habitat of an endangered species is selected as the site of a clean energy project) associated with each GHG reduction measure (optional).*

*Tribes and Territories could consider identifying and tracking these benefits or disbenefits and discussing mitigation measures for any disbenefits (optional).*

## Review of Authority to Implement *(required)*

*Tribes and Territories should use this section to identify which specific entities (e.g., tribal governments, leadership, third party stakeholders) have the authority to implement various GHG reduction measures.*

*If this authority must be obtained, Tribes and Territories must include a schedule of milestones to achieve the authority of key entities (e.g., administrative agency, tribal council) to implement each reduction measure listed above.*

## Identification of Other Funding Mechanisms *(optional)*

*Tribes and Territories are encouraged to identify alternative funding mechanisms which will allow them to fund a broader range of priority projects. Tribes and Territories may use this section to discuss potential funding opportunities for each emissions reduction measure and highlight funding gaps that can best be filled by CPRG. A list of potential funding opportunities can be found* Priority Climate Action Plan: Helpful Resources for Tribes and Territories*.*

## Workforce Planning Analysis *(optional)*

*Tribes and Territories are encouraged to provide an analysis of workforce development activities needed to implement priority measures included in the PCAP. Tribes and Territories may use this section to discuss how funding opportunities will allow Tribes and Territories to hire external labor, or how Tribes and Territories intend to train and hire personnel.*

# Next Steps *(optional)*

*Tribes and Territories may use this section to identify necessary next steps to successfully draft a CCAP or the timeline for the CCAP development. This section may include a high-level overview and could indicate which elements of the CCAP are already started due to the completion of the PCAP.*

1. GHG reduction measures may include measures that reduce GHG emissions and/or measures that enhance carbon sinks. [↑](#footnote-ref-2)