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Submitted via regulations.gov

Administrator Michael S. Regan

Deputy Assistant Administrator for Environmental Justice Matthew Tejada

Senior Associate Director for Grants Competition Bruce Binder

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue NW Washington, DC 20004

Re: RFI for EPA-HQ-OEJECR-2023-0023 – EPA’s Request for Information on Environmental and Climate Justice Block Grant Program,

Dear Administrator Regan, Deputy Assistant Administrator Tejada, and Senior Associate Director Binder:

We, the undersigned organizations (“TEEM Community of Practice¹”) appreciate the opportunity to provide joint comments in response to the Request for Information on the Environmental and Climate Justice Block Grant Program.

The Towards Equitable Electric Mobility (TEEM) Community of Practice is a multi-state and multi-year initiative with organizations dedicated to advancing equitable electric mobility. Our members are experts in environmental justice, public health, clean energy, transportation electrification, and much more.

With our shared mission to advance racial equity in electric mobility and climate goals, we strongly support the creation of the Environmental and Climate Justice (ECJ) Block Grant Program and applaud the Environmental Protection Agency’s commitment to providing benefits to disadvantaged communities.

In response to the Environmental Protection Agency’s request for comments related to the program’s design, eligible projects, eligible recipients, reporting and oversight, and technical assistance, we offer the following information/input:

ECJ Program Design

- 1. What should EPA consider in the design of the ECJ Program to ensure that the grants benefit disadvantaged communities?**

Center Cumulative Impacts & Local Knowledge to Identify Disadvantaged Communities:

As the EPA decides which tool they will use to identify disadvantaged communities for

¹ TEEM Community of Practice. Greenlining Institute. Retrieved from: <https://greenlining.org/work/transformational-communities/towards-equitable-electric-mobility-teem/>

this program (i.e. the Climate & Economic Justice Screening Tool (CEJST), EJScreen), we strongly recommend that the methodology include cumulative burden. We are concerned that the CEJST tool, by excluding cumulative impact, misses the distinction between areas with severe environmental and climate burdens and those with moderate burdens. Including cumulative impacts will prioritize those most affected by systemic environmental injustices.²

The EPA should also allow states that have their own tailored screening tools, such as California's CalEnviroScreen and Michigan's MiEJSCREEN, to use these tools instead of or in conjunction with the designated federal tool. Many states have developed their own tools in partnership with disadvantaged communities to embed locally relevant analysis and accurate data.³ In addition to this local relevance and accuracy, local advocates and project applicants may already have intimate familiarity with their state or jurisdiction's tool, and this could improve their ability to develop and implement ECJ projects that meet their specific community needs.

Require Community Needs Assessments: In order to determine community needs, ECJ should clearly require and fund applicants to utilize or develop community needs assessments. Across our national network, our partners have used community needs assessments to ground project design and outcomes directly in resident-identified needs, challenges, and priorities:

- Following a community mobility needs assessment,⁴ the Montbello community in Colorado identified three projects (e-bike library, electric vehicle charging station, and electric vehicles for community partner use) to improve transportation access for residents.
- In San Francisco, the Greenlining Institute's Mobility Equity Framework⁵ was used to assess the needs of local residents in District 10, which has a history of institutional neglect and environmental racism, including a contaminated EPA Superfund site at the Hunter's Point Shipyard. The participants used a practice called Equity Design⁶ that focuses on building the power of those on the front lines to influence the process and the outcomes of the project. The goals that emerged from this project went beyond improved mobility to include increased

² Dean, B., Esling, P., & Watson, G. (2023, March 10). CEJST is a simple map, with big implications – and attention to cumulative burdens matters. Intersections.

³ EJ Tools Map. (2023). Environmental Policy Innovation Center. <https://epic-tech.shinyapps.io/ej-tools-beta/>

⁴ A Neighborhood- Based Approach to Equitable Electric Mobility. Guidehouse and Denver Climate Action, Sustainability and Resiliency. Retrieved from: <https://www.denvergov.org/files/assets/public/climate-action/documents/denver-vehicle-electrification-equitable-e-mobility-final-report.pdf>

⁵ Mobility Equity Framework: How to Make Transportation Work for People. (2018, March 21) Greenlining Institute. Retrieved from: <https://greenlining.org/publications/mobility-equity-framework-how-to-make-transportation-work-for-people/>

⁶ Co-Designing Equitable Transportation in Southeast San Francisco. (2019, April 16). Kong, Ezra. Retrieved from: <https://medium.com/reflex-design-collective/co-designing-equitable-transportation-in-southeast-san-francisco-43ac70b4ae55>

employment opportunities, better public safety, and greater ability for marginalized communities to co-design solutions that work for them.

Require & Fund Meaningful Community Engagement: The ECJ Program should require that applicants demonstrate meaningful community engagement throughout the planning, implementation, and completion of the project, as well as allocate sufficient time, funding, and resources to direct community outreach and engagement. Building relationships and trust with disadvantaged communities takes both time and resources. The EPA should also require that projects outline outreach and engagement methods that are specific to the community it's serving. These may include roundtables, workshops, joining community events, social media, ads and paid promotion, advisory boards, and townhall meetings, for example.

To stand up meaningful community engagement, the ECJ program must permit community engagement expenditures related to providing food, childcare, transportation, participant stipends, translation services, and more. The ECJ program should also make the subgranting process as simple as possible, including the ability to subgrant to CBOs and leaders whose participation is critical for success and may not be registered as a 501(c)3.

Require Multi-Stakeholder Collaboration: The ECJ program should prioritize applicants that share decision-making power with the communities they serve. Therefore, the program should encourage multiple types of partnerships, including coalitions and collaboratives of organizations.

This includes partnerships between different kinds of stakeholders, as well as collaboratives of community-based organizations working together. TEEM and many other coalitions have demonstrated the potential that building bridges between traditional environmental and environmental justice groups can have. Especially related to centering equity in climate advocacy and building the capacity and technical expertise of grassroots groups to advance their priorities.

Applicants should be required to co-create Memorandums of Understanding (MOU) and include principles of engagement as part of the application. Lead applicants must also show sufficient fiscal and administrative capacity to pass through grant funds to smaller-capacity partners. These applications should be held to the standard of authentic partnerships, which should be measured by community-based needs assessments, budget allocations, and letters of support. For example, the Greenlining Institute and Forth co-created shared equity principles and an MOU to support an authentic and collaborative partnership for TEEM.⁷

⁷ *TEEM Equity Principles, Commitments, and Community Agreements*. (2022). Greenlining Institute, Forth. <https://drive.google.com/file/d/1weA6ItM7-sc99aILd6pwwfPvQ66Cjgh/view?usp=sharing>

Maximize Multiple Benefits: To ensure that grants provide maximum benefits to disadvantaged communities, the EPA should fund projects that deliver multiple environmental justice, socioeconomic, and public health benefits. For example, infrastructure projects should provide workforce development and other types of training so skills are transferred to the community. Other types of benefits should include increased access to affordable housing, electric vehicle charging infrastructure, public transportation, and reliable e-mobility options.

Resilience hubs based in and dedicated to serving disadvantaged communities can serve as excellent ECJ projects that maximize multiple benefits. The ECJ program should fund resilience hubs that offer emergency and climate disaster shelter and services for vulnerable communities. In addition to emergency and disaster preparedness, resilience hubs can provide flexible transportation options, battery storage, and wellness and education opportunities.

Prioritize Shovel-Worthy Projects: The ECJ program should prioritize shovel-worthy projects instead of focusing primarily on shovel-ready projects. Shovel-ready projects are typically at an advanced stage of development and can launch immediately upon investment. The default approach to fund shovel-ready projects excludes communities that may not have the resources and capacity to pre-plan projects without additional funding. Prioritizing shovel-worthy projects will help advance community-driven initiatives that secure long-term benefits and equitable outcomes.

Provide Flexible Funding: The ECJ program should allow flexible funding that enables applicants to respond to the needs of the communities they serve. As the COVID-19 pandemic and many recent natural disasters have shown, communities will experience emergent needs, changing conditions, climate emergencies, and more. The ECJ program should therefore allow projects the flexibility to pay for relevant and timely services not initially included in project scopes.

Provide Peer Learning Opportunities: Program applicants would benefit from being able to connect with each other as they move through implementation. Creating a community of practice model that connects applicants, provides direct technical assistance and resources, and creates a learning environment could help applicants make progress on their projects. The Towards Equitable Electric Mobility (TEEM) Community of Practice⁸ is an example of peer learning that brings together advocates to share resources and best practices, and creates dedicated spaces to talk about equitable electric mobility.

⁸ TEEM. Forth. Retrieved from: <https://forthmobility.org/our-work/public-policy/TEEM>

2. Are there best practices in program design that EPA should consider in designing the ECJ Program to reduce burdens on applicants, grantees, and/or subrecipients?

Simplify Application, Reporting, and Grant Compliance: The EPA should simplify and streamline both the application and reporting processes to reduce the burden on smaller organizations, including CBOs. The burden of applying for and managing federal funding can deter many qualified CBOs from applying.

- Information about grants, application process, and assistance should be linked regularly on all websites and notices related to the opportunity. EPA should provide clear directions and templates. For example, if a SAM account is required, provide clear, simple, and easy-to-follow instructions on creating an account and have support available to help with that process.
- EPA staff should offer 1:1 technical assistance and support, and be available to answer questions and offer feedback.
- Applicants should be able to fill out a common application, such as JustFund's Common Proposal⁹ so they can apply to multiple funding opportunities more easily and so the EPA and other governmental funding entities can directly notify them of future grant opportunities that may be a great fit.
- Utilize a simple reporting process that avoids complicated and burdensome invoicing, work planning, and approval processes such as those currently required by the EPA's Technical Assistance Grant (TAG¹⁰) program. EPA Project Officers that are appointed to provide technical assistance to ECJ projects should work with participants to minimize administrative burdens, and where relevant, develop partnerships with frontline-serving intermediaries¹¹ to streamline grant compliance.

Advance Payment of Grant Funds: Most federal grants are disbursed through a reimbursement process that requires grantees to complete deliverables using their own resources and then submit invoices for reimbursement. This reimbursement model poses a major financial barrier for under-resourced organizations and local governments that often don't have sufficient reserves to be able to cover several months of payroll and expenses. The reimbursement model disincentivizes the most disadvantaged

⁹ JustFund. JustFund. Retrieved from: <https://justfund.us/>

¹⁰ Are EPA programs creating more barriers for polluted communities? (2023, January 30). Hearn, Jamie. Retrieved from: <https://thehill.com/opinion/energy-environment/3836466-are-epa-programs-creating-more-barriers-for-polluted-communities/>

¹¹ Frontline- serving intermediaries: An underutilized tool for philanthropy. (2022, December 28). Issue Lab. Retrieved from: https://search.issuelab.org/resource/frontline-serving-intermediaries-an-underutilized-tool-for-philanthropy.html?_gl=1*1dxobnt*_ga*MjA4NzUyODEwMS4xNjcyODU3Nzg3*_ga_5W8PXYGBX*MTY3NDU5NjU0My4yLjAuMTY3NDU5NjU0My42MC4wLjA.&_ga=2.252323853.564137077.1674596544-2087528101.1672857787

communities from applying and would greatly hinder the ability for the ECJ to achieve its goal of directly benefiting frontline communities.

We urge the EPA to make timely advance payments to grantees. For example, the California Air Resources Board Sustainable Transportation Equity Program (STEP)¹² uses an advance pay regulation to grant the majority of its funds.¹³ An advance payment method will enable the EPA to better reach the communities that need this funding the most. It will also help ensure a more seamless and equitable implementation process that equips under-resourced groups with the upfront capacity to get a strong start on their projects, make necessary adjustments, and follow through on their deliverables.

Eligible Projects

- 1. What types of projects should EPA focus on and prioritize under the five eligible funding categories in CAA Section 138(b)(2) listed below? Please also describe how the projects you identify would benefit disadvantaged communities.**

We encourage the EPA to focus on and prioritize projects with specific and measurable reductions in GHG emissions and other air pollutants that directly benefit disadvantaged communities. The TEEM Community of Practice focuses on equitable transportation electrification, and we encourage the EPA to prioritize equitable transportation investments.

Transportation is the largest source of air pollution in the United States, with environmental and health implications disproportionately affecting low-income communities of color.¹⁴ For many, poor access to transportation stems from racially discriminatory policies. Today, transportation is the second-highest household expense for most people, and a person's commute time is the most critical factor in their chances of escaping poverty.¹⁵

Innovative mobility programs – such as carsharing, micromobility, and transit – that utilize electric mobility are potential solutions to many of these challenges. We recommend the following project types in order of prioritization below. Programs are prioritized based on greenhouse gas emission reductions and increased mobility options in disadvantaged communities.

¹² *Sustainable Transportation Equity Project Implementation Grant Solicitation*, 4 June 2020. https://ww2.arb.ca.gov/sites/default/files/classic/msprog/step/step_implementation_grant_solicitation.pdf. Accessed 3 Mar. 2023.

¹³ *Proposed Additional Requirement for Advance Payment of Certain Funds Regulation*. California Air Resources Board, 3 Sept. 2019, <https://ww2.arb.ca.gov/rulemaking/2019/advancedpayment2019>.

¹⁴ *Carbon Pollution from Transportation*. (2022, May 19). United States Environmental Protection Agency.

¹⁵ Chetty R. & Hendren N. (2015) *The Impacts of Neighborhoods on Intergenerational Mobility*. Harvard University. Retrieved from http://www.equality-of-opportunity.org/images/nbhds_exec_summary.pdf on November 2, 2017.

- a. Electric and Zero Emission Transit: In many communities, asthma rates are disproportionately high along major transit routes, which also tend to have high pollution diesel truck traffic.¹⁶ To maximize public health benefits, zero emission and electric transit bus projects in high pollution neighborhoods should be prioritized.

Zero emission trains such as those being purchased in Illinois¹⁷ and built in Utah¹⁸ offer exciting opportunities for environmental justice and economic development. These investments must meaningfully engage frontline communities in planning and implementation processes as well as in the benefits that they accrue. For example, the EPA should prioritize projects that empower grassroots CBOs to partner with their local transportation department to decide on transit routes and stops. These projects should also offer job training for local residents to build skills in the manufacturing and operation of clean transit fleets.

- b. Electric School Buses. Increasing access to electric school buses in disadvantaged communities can help lower greenhouse gas emissions in communities that are disproportionately burdened by transportation-related emissions. Disadvantaged communities and rural communities can also benefit from school bus electrification by providing energy storage, stabilizing electric grids, and acting as an energy source during emergencies. Based on feedback received by TEEM members so far, it would be valuable for the EPA to provide technical assistance to school districts to develop electric school bus fleet plans that include infrastructure planning, so they can then take advantage of the Clean School Bus Program.

In the Illinois Williamsfield School District, the Bus2Grid Initiative¹⁹ is incorporating bidirectional electric school buses and chargers into their fleet to provide clean transportation options to their students and provide energy benefits to the community.

- c. Community Mobility, Resilience, and Wellness Hubs. Community anchor institutions that provide multiple services allow disadvantaged communities to access resources in one centralized location. These hubs serve as ideal locations for community engagement and education related to neighborhood and

¹⁶ Urbaszewski, B. (2020). *New Report Shows Higher Rates of Lung Disease Near Chicago's Busiest Transit Bus Routes*. Respiratory Health Association.

¹⁷ Metra to create battery-powered locomotives. (2022, August 17). Metra. Retrieved on: <https://metra.com/newsroom/metra-create-battery-powered-locomotives>

¹⁸ Zero-emission trains built in Utah promise a cleaner future. (2023, March 1). KSL.com. Retrieved from: <https://www.ksl.com/article/50582124/zero-emission-trains-built-in-utah-promise-a-cleaner-future>

¹⁹ How does it work? Bus2Grid. Retrieved from: <https://www.bus2grid.org/how-does-it-work>

project development. They are based in frontline communities, trusted by local residents, and capable of providing high quality jobs as well as attracting tourism, private capital, and other economic development and investment opportunities.

For example, community mobility hubs such as Equiticity's Go Hub²⁰ offer multiple types of mobility such as e-bikes, e-scooters, and e-carsharing along with community excursions. Community hubs such as Eastside Community Network Wellness and Resilience Hub²¹ offer community members multiple services related to wellness and emergency and climate resilience that also intersect with electric mobility.

- d. Increasing Access to Electric Bicycles (E-Bikes). E-bikes are another active mode of transportation that can help disadvantaged communities get where they need to go without a vehicle. Programs should have multiple partners to support grant administration and community outreach, and should be free or low-cost for community members.

For example, the Denver e-bike rebate program²² provides increased rebates for income-qualified recipients and recipients with disabilities who need an adaptive bike. Community e-bike library programs²³ are another way to increase exposure to e-bikes and increase mobility options in disadvantaged communities.

- e. Electric ridesharing and carsharing. Projects that utilize electric mobility for carsharing and ridesharing can increase mobility options in disadvantaged communities while also improving public health and reducing local GHG emissions. The ECJ Program should prioritize electric ridesharing and carsharing programs at or near affordable housing, local senior centers, and other locations that communities frequent. An example of a program serving disadvantaged communities is the St. Louis Vehicle Electrification Rides for Seniors (SiLVERS²⁴), where electric rideshare is available for seniors and also is used to distribute food to homebound seniors. Another example is the Affordable Mobility Platform²⁵ electric carsharing program, which is a nationwide community carsharing program where electric vehicles are placed at affordable housing.

²⁰ The Go Hub: A Community Mobility Center. Equiticity. Retrieved from: <https://www.equiticity.org/hub>

²¹ Stoudamire Wellness Hub. Eastside Community Network. Retrieved from: <https://www.ecn-detroit.org/stoudamire>

²² Electric Bikes (E-Bikes). Denver The Mile High City. Retrieved from: <https://www.denvergov.org/Government/Agencies-Departments-Offices/Agencies-Departments-Offices-Directories/Climate-Action-Sustainability-Resiliency/Sustainable-Transportation/Electric-Bikes-E-Bikes-Rebates>

²³ The NETC Bike Libraries. NETC. Retrieved from: <https://www.nettransportation.org/bike-libraries>

²⁴ SiLVERS. Forth. Retrieved from: <https://forthmobility.org/silvers>

²⁵ Affordable Mobility Platform. Forth. Retrieved from: <https://forthmobility.org/community-carsharing>

- f. **Community Charging.** Many low-income and rural communities are more likely to live and work in charging deserts where they have inequitable access to charging. Programs that provide community access to charging infrastructure at locations such as multi-family housing, on-street parking, and community centers like libraries. These programs can provide multiple benefits to disadvantaged communities such as increased access to charging, local workforce opportunities, and increased economic benefits for small businesses near and hosting charging stations.

Technical Assistance

1. **What types of technical assistance would be most helpful to the ECJ Program's eligible entities to help those entities successfully perform the ECJ Program grants?**

Application Phase: Technical assistance for the ECJ should start at the application phase. For many CBOs and smaller organizations, applying for federal funding opportunities presents barriers that ultimately deter them from applying at all or from submitting competitive applications. Technical assistance should focus on the following:

- Creating budgets that estimate true costs
- Simplifying invoice and payments options for subcontractors
- Collecting and analyzing necessary data
- Creating necessary accounts such as SAM
- Reviewing written proposal material
- Supporting collaboration and creating fair MOUs that include information on standard rates, roles, etc.

2. **Which types of organizations and institutions are best suited to provide technical assistance?**

Overall, organizations and institutions that have a strong understanding of community needs and racial justice are important partners to provide technical assistance. Often, technical assistance providers hold expertise on program management, data collection and analysis, and technology. However, for programs to successfully benefit disadvantaged communities, a racial equity lens is needed in all aspects of the program. In addition, technical assistance providers who are locally based in the communities they are supporting should also be prioritized.

We offer below a list of stakeholder types who could provide effective, culturally competent, and equity-driven technical assistance:

Frontline-Serving Intermediaries: Another type of entity that is well suited to provide TA for the ECJ Program is frontline-serving intermediaries²⁶. These intermediaries are deeply rooted in local communities, connected to key stakeholders, and knowledgeable about best practices in the climate justice movement. Given their knowledge and position, they can reduce administrative burdens for grantees and improve project outcomes by streamlining information sharing. The EPA should make space for ECJ applicants to share if there are specific intermediaries that they would like to work with and provide funding to compensate these intermediaries as TA providers.

Regional Energy Efficiency Organizations: Another entity that can provide technical assistance for the program are regional energy efficiency organizations (REEOs). REEOs serve as regional facilitators and conveners among a variety of stakeholders, such as non-profit, utility, private, and public stakeholders. REEOs additionally have experience with administering federal funds to stakeholders in local communities for clean energy programs and projects. REEOs also create equity throughlines between the built environment, workforce development, energy efficiency, and transportation sectors.

Conclusion

Thank you for the opportunity to comment. We look forward to working with you to implement this important program over the coming years. The TEEM Community of Practice welcomes the opportunity to discuss these ideas and recommendations.

Sincerely,

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²⁶ Frontline- serving intermediaries: An underutilized tool for philanthropy. (2022, December 28). Issue Lab. Retrieved from: https://search.issuelab.org/resource/frontline-serving-intermediaries-an-underutilized-tool-for-philanthropy.html?_gl=1*1dxobnt*_ga*MjA4NzUyODEwMS4xNjcyODU3Nzg3*_ga_5W8PXYYGbX*MTY3NDU5NjU0My4yLjAuMTY3NDU5NjU0My42MC4wLjA.&_ga=2.252323853.564137077.1674596544-2087528101.1672857787

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