BLUEGREEN ALLIANCE

CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

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Response to the Environmental Protection Agency's Request for Information - Greenhouse Gas Reduction Fund

The BlueGreen Alliance unites America's labor unions and environmental organizations to solve today's environmental challenges in ways that create and maintain quality jobs and build a stronger, fairer economy. Our partnership is firm in its belief that Americans don't have to choose between a good job and a clean environment—we can and must have both. We appreciate the opportunity to respond to the EPA's Request for Information on implementation of the Greenhouse Gas Reduction Fund.

EPA has a unique opportunity through this program to deliver meaningful, lasting benefits in low income and disadvantaged communities. This new program should be designed to maximize worker and public benefits, target disadvantaged and energy transition communities, and ensure that communities and workers have authority and representation in the oversight of this Fund. With the right implementation, the Greenhouse Gas Reduction Fund represents a critical pathway through which EPA can support clean energy deployment, pollution reduction and climate goals while creating good union jobs, growing domestic manufacturing, and delivering public health and environmental benefits to the workers and communities that need it most.

Section 1: Low-Income and Disadvantaged Communities.
1. What should EPA consider when defining "low-income" and "disadvantaged" communities for purposes of this program? What elements from existing definitions, criteria, screening tools, etc.— in federal programs or otherwise—should EPA consider when prioritizing low-income and disadvantaged communities for greenhouse gas and other air pollution reducing projects?

- **Defining Low-Income and Disadvantaged Communities.** The current U.S. Environmental Protection Agency (EPA) definition of an overburdened community is "minority, low-income, tribal, or indigenous populations or geographic locations in the United States that potentially experience disproportionate environmental harms and risks."[i] The Council on Environmental Quality (CEQ) has developed a screening tool and criteria for disadvantaged communities and the Department of

Energy's Energy Justice Dashboard maps where energy burdens are most unequal. EPA's EJScreen also maps communities experiencing different disproportionate environmental burdens. Several states also have defined "disadvantaged communities" in statute. There are also several states that have their own customized EJ screening tools. We recommend that EPA uses the CEQ screening tool to define low-income and disadvantaged communities, while keeping in mind that many environmental justice indicators are not captured by any of these existing tools or definitions. For this reason, it is important that these tools be used in conjunction with advice from those closest—local workers and community members who can identify themselves as disadvantaged communities and access the federal resources promised. Our comments to CEQ on the beta version of the environmental justice screening tool laid out some additional suggestions for defining disadvantaged communities, including taking into account race, and deindustrialized and energy transition communities.[ii]

The whole-of-government Justice40 Initiative calls for a minimum of 40% of all benefits of climate and clean energy federal investments to go to disadvantaged communities that are marginalized, underserved and overburdened by pollution. We encourage EPA to add the Greenhouse Gas Reduction Fund to the list of programs covered by the Justice 40 Initiative. BGA encourages EPA to consider 40% of investments to be the floor—not the ceiling—for funding to disadvantaged communities. Given the intent of this program, it is not unreasonable to expect 100% of this Fund's investments to go to low-income and disadvantaged communities. This will begin to address this larger definition of communities in need, and to include communities that have been disproportionately harmed by deindustrialization, energy transition, and other forms of job loss.

- **Energy Transition Communities and Other Prioritization Criteria.** Projects should be prioritized in regions particularly hit hard by job losses in the fossil energy and manufacturing sectors in addition to other low income communities. This program should prioritize targeting funds to those places where low-income and disadvantaged communities overlap with energy transition and deindustrialized communities, particularly those that have been hurt economically by the transition from fossil fuels like coal. Indeed, EPA rulemaking in the coming years—combined with market and policy drivers—are likely to further impact additional fossil communities. Prioritizing and targeting federal resources to workers and communities in places impacted by this shift needs to be deliberate and intentional. With this program, EPA can drive quality job creation and economic

diversification in regions like Central Appalachia and other places that have kept the lights on in this country for generations.

Section 1: Low-Income and Disadvantaged Communities.
2. What kinds of technical and/or financial assistance should the Greenhouse Gas Reduction Fund grants facilitate to ensure that low-income and disadvantaged communities can participate in and benefit from the program?
3. What kinds of technical and/or financial assistance should the Greenhouse Gas Reduction Fund grants facilitate to support and/or prioritize businesses owned or led by members of low-income or disadvantaged communities?

- **Incorporate technical assistance and capacity building into program design.** Communities often already have a clear vision for economic development goals, but are not sufficiently empowered or equipped to lead implementation of those plans, build the financial resources necessary to start and sustain community-wide efforts, or attract expertise and resources needed to champion efforts and successfully navigate politically complex environments. EPA should directly address these issues by incorporating the necessary capacity building, technical assistance, project development, and community engagement support into the program design. EPA should provide technical assistance at the community level to educate both community members and entities about decarbonization benefits and strategies, and to connect interested communities to project development resources, including points of contact who can advise communities that apply for this program on procedures, deadlines, and implementation requirements. In addition, many lenders would benefit from a technical assistance platform to provide lender education, product information, uniform standards, as well as metrics for decarbonization, professional certification standards for third parties, and capacity building.

- **Encourage applications that include a section describing how the proposed project benefits disadvantaged communities.** In addition to the workers and communities we outline in our response to questions in *Section 2: Program Design*, other benefits may include:
    - Projected energy bill savings in disadvantaged communities;
    - Projected increase in wages and economic security in disadvantaged communities;

- Projected health benefits of the project to disadvantaged communities; and/or
- Evidence of early and meaningful community engagement and explicit support around a proposed project.

Section 2: Program Design.
7. What should EPA consider in the design of the program, in addition to prevailing wage requirements in section 314 of the Clean Air Act, to encourage grantees and subrecipients to fund projects that create high quality jobs and adhere to best practices for labor standards, consistent with guidance such as Executive Order 14063 on the Use of Project Labor Agreements and the Department of Labor's Good Jobs Principles?

EPA should consider the following high-road labor standards to ensure that funded projects create high quality jobs:

- **High-Road Wages.** Any construction funded through this program must adhere to section 314 of the Clean Air Act. Higher wages can attract highroad contractors employing skilled professionals who perform high quality work, helping projects meet construction milestones on-time and safely, without increasing total construction costs. Higher wages can have long-term economic benefits to a community and create a long-standing professional workforce for future projects. At the same time, Davis Bacon should be considered the floor of what the EPA can do to ensure job quality through this program.

- **Project Labor Agreements (PLAs), Community Benefits Agreements (CBAs) and Community Workforce Agreements (CWAs).** Construction projects not subject to EO 14063 can still benefit from a PLA. PLAs control the terms and conditions of employment of workers on specific construction projects—including wages, hours, working conditions, and dispute resolution methods. These agreements can be utilized at the state and local level to ensure high-road labor standards and timely projects.

A Community Workforce Agreement (CWA) or Community Benefit Agreement (CBA) is an enforceable contract, supplemental to a PLA or collective bargaining agreement that reflects community input and outlines benefits for the community where the project is happening. CWAs and CBAs are beneficial tools for communities when included in PLAs,

as they can be more expansive in scope and are sometimes negotiated with both union and community partners.

CWAs frequently include local hire provisions, targeted hire of low-income or disadvantaged workers, and the creation of pre-apprenticeship pathways for careers on the project. EPA should consider conditions on Greenhouse Gas Reduction investments supporting the use of CBAs/CWAs and community engagement processes—in addition to PLAs and union neutrality—to ensure recipients are employing workers from local communities, and encouraging broader pathways into good, family-supporting jobs.

- **Targeted Hire.** Targeted hire provisions—often a key feature of CWAs—mandate or incentivize the hiring of workers on a project from certain communities, which may include women, people of color, veterans, the formerly incarcerated, indigenous people, economically disadvantaged communities, communities heavily impacted by climate change or climate change policies, workers dislocated by the energy transition, and many others. These communities may be targeted through contracting requirements, hiring requirements, or the use or establishment of pre-apprenticeship programs. Ideally, these provisions establish long-lasting pipelines for members of disadvantaged communities to access good jobs and careers in the clean economy.

- **Local Hire.** Local hire provisions mandate or incentivize the hiring of workers from within the state or local community. Without this provision, work crews from out of state can be brought in, minimizing the job creation benefits for the local community. Local hire provisions may mandate a certain percentage of local workers be used, they may offer incentives to hire local workers, or they may simply require that local employment impacts are considered alongside other benefits of projects being evaluated. Entities receiving funds should work to identify existing community networks for recruitment of disadvantaged workers.

- **Registered Apprenticeship, Pre-Apprenticeship, and Labor Management Partnerships,** One of the main mechanisms for building career pathways is through registered apprenticeship, pre-apprenticeship, and other union-affiliated training programs. Pre-apprentice programs aim to ensure that workers can qualify for entry into an apprenticeship program and have the skills and support they need to succeed. These programs are generally designed to target certain populations or demographics such as low-income workers, workers of color, women, and other

marginalized communities. Additionally, many unions offer training throughout a member's career to enable them to stay up to date with changes in technology. The most successful pre-apprenticeship programs are those affiliated with registered apprenticeships or other contractually agreed on-the-job training programs. EPA should require or incentivize pre-apprenticeship opportunities targeting disadvantaged communities that are linked to registered apprenticeship programs. EPA should also award funding to entities that integrate pre-apprenticeships with community-based "wrap around" services to maximize retention of disadvantaged and underrepresented workers as they enter careers.

Apprenticeships are registered through a state apprenticeship agency or through the Federal Department of Labor. Registered apprenticeships are paid positions that combine on-the-job training with classroom instruction in a trade. Construction unions operate robust registered apprenticeship programs while industrial unions work with employers on joint labor management training programs that also provide a combination of classroom and on-the job skills training.

EPA should consider additional high-road labor standards, such as: union neutrality; occupational health and safety standards and programs; avoidance of misclassification, and excess use of contracted or temporary employees; and omitting or limiting drug testing or background checks. In addition, EPA should engage with the U.S. Department of Labor (DOL), including the Employment and Training Administration (ETA) and Good Jobs Initiative in particular, to establish these standards and determine what information and tools DOL can provide to support the identification and categorization of job opportunities for local workers.

Section 2: Program Design.
9. What should EPA consider when developing program policies and guidance to ensure that greenhouse gas and air pollution reduction projects funded by grantees and subrecipients comply with the requirements of the Build America, Buy America Act that requires domestic procurement of iron, steel, manufactured products, and construction material?

- **Build America, Buy America (BABA).** The Build America, Buy America Act requires federal agencies to prioritize improving job opportunities by focusing on high-road labor standards in the implementation of infrastructure projects. Implementing policies, such as BABA, to increase domestic manufacturing can help to support and create quality manufacturing jobs. EPA should ensure use of domestic content

and Buy America standards in projects funded by this program. As Build America, Buy America (BABA) comes into effect and strengthens the Buy America requirements associated with federal investments, the positive market and employment effects generated by the Greenhouse Gas Reduction Fund will be further magnified.

Supply chain reporting and disclosure should also be encouraged while incentivizing assembler/supplier commitments and accountability. Further, a waiver process for unavailability should be limited as the vast majority of component parts can be sourced domestically (e.g., steel and aluminum for the manufacturing of clean technologies). It is in the public interest to avoid waivers for these domestic content requirements, given the environmental and economic benefits of sourcing from domestic manufacturers. On average, U.S. manufacturing of steel and aluminum produces fewer greenhouse gasses and pollutants than in most other countries that are major producers. Research has found steel production in the U.S. is the second cleanest in the world.[iii]

- **BABA, Domestic Manufacturing, and Racial and Economic Inequality.** Numerous studies find that the decline in U.S. manufacturing under unfair trade policies has contributed to income inequality.[iv] Black, Hispanic, Asian American/Pacific Islander (AAPI), and white workers without a college degree all earn substantially more in manufacturing than in non-manufacturing industries.[v] Laid-off manufacturing workers have been forced to compete for lower-paying service sector jobs, putting downward pressure on middle class wages across the economy.

  Less reported is the fact that the manufacturing decline and resulting pay cuts have disproportionately impacted Black workers and other workers of color. A recent report by EPI found that "the loss of manufacturing jobs has been particularly devastating for Black and Hispanic workers and other workers of color, who represent a disproportionate share of those without a college degree, and for whom discrimination has limited access to better-paying jobs."[vi] Black manufacturing employment has fallen more than 30% since the late 1990s, contributing to the Black-white wage gap.

  Timely implementation of BABA will be critical to creating good, family- and community-sustaining job opportunities. With proper targeting, BABA could offer sizable economic gains for workers of color and low-income workers who've been hardest hit by the decline in manufacturing while uplifting those communities, such

as through an increased tax base which can increase local school budgets and improve constituent services.

Section 2. Program Design
2. What should EPA consider in the design of the program to ensure Greenhouse Gas Reduction Fund grants facilitate additionality (i.e., federal funding invests in projects that would have otherwise lacked access to financing)?
10. What federal, state and/or local programs, including other programs included in the Inflation Reduction Act and the Infrastructure Investment and Jobs Act or "Bipartisan Infrastructure Law," could EPA consider when designing the Greenhouse Gas Reduction Fund? How could such programs complement the funding available through the Greenhouse Gas Reduction Fund?

- **Target underfunded sectors with significant impacts in low-income and disadvantaged communities.** For example, retrofitting the United States' schools is one key opportunity the EPA should consider for this program. The state of our nation's schools is dire, and we need a robust set of solutions to repair our educational infrastructure, improve the health and safety of our students and staff, reduce greenhouse gas emissions, and create good-paying jobs. Public school buildings are estimated to have an annual spending gap of $85B in deferred maintenance costs.[vii] Targeted and robust funding for public buildings in general, and schools in particular, were underfunded by the BIL and Inflation Reduction Act even though these types of buildings tend to be the most energy intensive because they are older, historic and/or have high electricity demand.[viii] These characteristics also make schools prime candidates to significantly reduce greenhouse gas emissions while directly benefiting disadvantaged communities.

School infrastructure in low-income communities is notoriously abysmal and presents a host of health, learning, and environmental problems. Research shows that as the percentage of students who qualify for reduced-cost lunch increases, the quality of the school building decreases.[ix] School districts with higher enrollments of students from low-income families are more likely to report their buildings in "fair" or "poor" condition.[x] Furthermore, school districts with higher enrollments of students from low-income and minority families spend thousands of dollars less per student in facilities capital improvements than districts in high-wealth communities.[xi] Many studies show that after controlling for income, students in poor quality school buildings score between 5 to 11 percentile points lower on standardized tests than students in modernized buildings.[xii]

Modernizing school facilities provides an opportunity to significantly reduce energy costs and greenhouse gas emissions, and improve the quality of indoor learning environments. All told, school facilities emit 72 Million Metric Tons of CO2 annually which is the equivalent of the CO2 emissions of 14 million homes' electricity for one year.[xiii] Furthermore, according to the EPA, around a quarter of energy used in U.S. schools is wasted and facilities in low income areas are often the least efficient.[xiv] Moreover, the second-highest operating expenditure for schools is energy, with schools spending more than $8 billion on energy every year.[xv] Meanwhile, green schools, which achieve the maximum level of water and energy efficiency and are built with the health of occupants in mind, utilize an average of 33 percent less energy and 32 percent less water, lowering utility costs of a typical green school by around $100,000 annually.[xvi]

While schools are one prominent example, communities should have the final say on which projects best suit their needs. Communities may choose to invest in other underfunded needs including transit, resilience, public hospitals, nursing homes, affordable housing, or other sectors.

- **Leverage existing programs and structures.** There are a number of programs in the BIL and Inflation Reduction Act that the Greenhouse Gas Reduction Fund could leverage. For example, to target communities impacted by energy transition, EPA could work with the U.S. Department of Energy (DOE)'s Clean Energy Demonstration Program on Current and Former Mine Land and the U.S. Department of Interior (DOI) and Office of Surface Mining Reclamation and Enforcement (OSMRE) to integrate the regulatory process for reclaimed mine land uses with the projects selected for this program. Additionally, EPA should align and leverage this fund with programs that already target low income and disadvantaged communities such as DOE's Clean Energy Demonstration Program on Current and Former Mine Land (BIL) or DOI's $11.3 billion in abandoned mine land (AML) cleanup funding (BIL). This would not only be cost effective, but would reduce air and water pollution while increasing the economic impact for nearby communities. Further, EPA could maximize resources going to energy transition communities and disadvantaged communities working on energy justice issues via coordination with upcoming EPA Thriving Communities Technical Assistance Centers.

Additionally, EPA should work with DOE to use the structure of the Interagency Working Group on Coal and Power Plant Communities and Economic Revitalization (IWG) to

ensure coordination with economic development grant-making agencies that received funding in the BIL or Inflation Reduction Act such as the EDA, ARC, and USDA Rural Development mission area. Ideally, the projects created under EPA's Greenhouse Gas Reduction Fund would be aligned and leveraged alongside economic development efforts of these agencies.

Section 4: Eligible Recipients
2. What types of entities (as eligible recipients and/or indirect recipients) could enable Greenhouse Gas Reduction Fund grants to support investment and deployment of greenhouse gas and air pollution reducing projects in low-income and disadvantaged communities?

- **Focus on entities with a proven track record that promote community ownership, worker benefits, and accountability.** The Greenhouse Gas Reduction Fund has two purposes: 1) to assist communities in their efforts to reduce emissions and 2) to enable communities to deploy or benefit from zero-emission technologies. For this reason, EPA should direct funding to entities that support community ownership, public institutions, and empower communities and workers to share in the benefits of emissions reduction. EPA should also ensure that any entities receiving financing meet criteria to ensure this program creates and supports high quality jobs and creates a sustainable pipeline of community based projects to ensure that we reduce emissions in disadvantaged communities while also delivering worker, public health and community benefits. One way to achieve this is by prioritizing projects that reduce greenhouse gas emissions and other pollution at entities that serve and employ large numbers of people in disadvantaged communities, like government entities, public sector entities, and other institutions such as public schools, public hospitals, nursing homes, and low-income housing.

In addition to directing funds to entities that adhere to the community and worker standards mentioned elsewhere in this response, EPA should also direct funds to entities with a demonstrated track record of successfully deploying capital in low-income and disadvantaged communities and a commitment to collaborate with a broad array of stakeholders such as such as community-based organizations, labor unions, local nonprofits, and local businesses that are committed to environmental justice and/or serve disadvantaged communities. Entities should demonstrate how they have and will continue to work alongside communities, supporting and collaborating on project development (see our response to questions in *Section 5: Oversight and Reporting*), investing in workforce

and small business development, and measuring and evaluating their progress. Any entity awarded funding must ensure that the economic benefits of this program stay within the community, and support local workforce development and economic diversification.

Section 5: Oversight and Reporting
1. What types of governance structures, reporting requirements and audit requirements (consistent with applicable federal regulations) should EPA consider requiring of direct and indirect recipients of Greenhouse Gas Reduction Fund grants to ensure the responsible implementation and oversight of grantee/subrecipient operations and financial assistance activities?
2. Are there any compliance requirements in addition to those provided for in Federal statutes or regulations (e.g., requirements related to administering federal grant funds) that EPA should consider when designing the program?
4. What should EPA consider in the design of the program to ensure community accountability for projects funded directly or indirectly by the Greenhouse Gas Reduction Fund? What if any existing governance structures, assessment criteria (e.g., the Community Development Financial Institutions Fund's Target Market Accountability criteria), rules, etc., should EPA consider?

- **Make governance inclusive and powerful.** It will be particularly important to get the governance of this fund right. EPA should implement a structure where impacted communities and workers have real authority and representation in the direct governance of this fund, however it's ultimately structured.

  One way this might be accomplished is through a federal governance board to establish unified, high-level parameters for funding and ensure overall coordination, combined with a "community-hub" structure that invests in bottom-up planning. Community hubs should empower local leaders, and offer communities access to the resources, capacity building, and technical assistance needed to successfully deploy Greenhouse Gas Reduction Fund financing to address locally-defined priorities. This would allow each community to tailor investments to their particular needs while also ensuring consistency of high-level funding goals and maintaining oversight of the program at the federal level.

Impacted workers and disadvantaged communities should have real decision-making power in setting goals and criteria for the funding, approving awards, and conducting oversight. Representatives of impacted workers and communities should constitute the majority of the voting membership of governing boards—not merely advisory boards—at

both the federal and community hub levels. Representatives should come from labor unions, Tribes, relevant non-profit partners, small and medium businesses, and community leaders/members from disproportionately affected and disadvantaged communities. Meanwhile, an advisory board could include technical experts, such as economic development professionals, engineers, financiers, and urban design experts, to help offer counsel to the governing board and assess the impact of the Greenhouse Gas Reduction Fund.

- **Require robust reporting and community engagement.** Whether at the federal or local level, direct and indirect recipients should be able to show that they've engaged in a robust, multi-stakeholder process to ensure buy-in and explicit support from workers and community members in low-income and disadvantaged communities (see our answers to questions in Sections 1 and 2). Tribal consultation should also occur when appropriate.

EPA should prioritize projects that show evidence of early consultation with workers and disadvantaged communities to ensure that the projects benefiting from this program support their environmental and economic needs. Prioritizing public input and community participation is key in determining which projects are chosen and how they are implemented. With community buy-in, these sites can create long-term, permanent jobs and help diversify the economies of communities. The RECLAIM Act (H.R.1733/S.1455, 117th Congress) offers a potential model to follow. The bill prioritizes projects in communities that have suffered from a decline in the coal economy, and requires local stakeholder collaboration in development goals and planning.

It is imperative that the EPA incorporate input from Tribes, communities of color, low-income communities, labor unions, and communities that have suffered from deindustrialization, energy transition, and environmental injustice into the selection of projects.

EPA may expand the benefits of this program by incorporating reporting and audit metrics to ensure that low income and disadvantaged communities are truly seeing the benefits of this funding and to ensure workforce outcomes and benefits are met and delivered. For example, EPA should collect information on the number of local workers that contractors employ in order to assess the success of this aspect of the program. This could include tracking anonymized disadvantaged worker participation (recruitment, retention and advancement), in coordination with the DOL.

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[x] Build America's School Infrastructure Coalition, *Education Equity Requires Modern School Facilities*, 2018. Available online: https://static1.squarespace.com/static/5a6ca11af9a61e2c7be7423e/t/5ba23b3688251b659c2f9eff/1537358671343/Education+Equity+Requires+Modern+School+Facilities.pdf

[xi] Ibid

[xii] BlueGreen Alliance, *Making the Grade 2.0: Investing in America's Infrastructure to Create High-Quality Jobs and Protect the Environment*, 2017. Available online: https://www.bluegreenalliance.org/wp-content/uploads/2017/09/MakingTheGrade-2.pdf

[xiii] Generation180, Solar Schools Campaign Toolkit, 2022. Available online: https://generation180.org/solar-schools-campaign-toolkit-download/

[xiv] Center for Green Schools, *Green Schools are Better for Budgets*, 2022. Available online: https://centerforgreenschools.org/about/green-school-buildings-better-for-budgets#:~:text=Green%20school%20buildings%20are%20better%20for%20budgets%20because%20they%20are,utility%20expenses%20and%20reduced%20absenteeism.

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