

AMERICAN SOCIETY OF
ADAPTATION PROFESSIONALS

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TO:

Mr. Bruce Binder, Senior Associate Director for Grants Competition Office of Grants and Debarment/Office of Mission Support

Mr. Matthew Tejada, Deputy Assistant Administrator for Environmental Justice

EPA Office of Environmental Justice and External Civil Rights

RE: RFI for EPA-HQ-OEJECR-2023-0023

Dear Director Binder and Administrator Tejada:

Thank you for the opportunity to provide EPA with recommendations for its Environmental and Climate Justice Grant Program. Members of the American Society of Adaptation Professionals (ASAP) compiled and refined the recommendations below. ASAP supports and connects climate adaptation professionals to advance innovation in the field of practice. With over 1,000 individual adaptation professionals - and 45 organizational members collectively employing hundreds of thousands of people - ASAP's members offer expertise covering all facets of the rapidly evolving field of climate change adaptation. Many of our members are leaders in - or work in service of - frontline communities as they respond to climate impacts. ASAP members bring to their work values and practices grounded in justice and equity, as articulated in [ASAP's Professional Guidance Resources](#).

The recommendations below respond to those questions in EPA's RFI that align most closely with our members' expertise.

We appreciate EPA's efforts to collect public input in a manner that facilitates just and equitable implementation of the agency's programs, regulations, and policies. ASAP believes that these efforts can translate into a more inclusive approach to climate adaptation both at the federal and local level. Our organization is uniquely positioned to provide nuanced and diverse input based on our members' real-world expertise and experience implementing EPA programs and policies, and we welcome the opportunity to support EPA's efforts to manifest social equity and environmental justice both now and in the future. Please do not hesitate to let ASAP know how we can be of service to EPA in its efforts to establish programs designed to maximize equity and justice in the face of climate risks.

Thank you for your time and consideration,



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

- **Budget requirements:** Eliminate the required match for disadvantaged communities. Allow grants to fund salaries to grassroots organizations executing projects.
- **Grant review/selection:** Include grant review/selection panelists from community-based organizations and include compensation for their services. Consider options other than competitive grants, such as awarding funding based on historic harm/cumulative impact.
- **Eligibility:** Clearly determine and define eligibility, but also think outside the box. Ensure clear definitions of underserved, underrepresented, and disadvantaged communities in program guidance that includes Black, Indigenous, and People of Color (BIPOC) and communities and neighborhoods that have faced systemic discrimination and environmental justice issues. Allow interpretations of disadvantaged communities sharing particular characteristics (per EO 13985) in addition to geographically disadvantaged communities identified under the Climate and Economic Justice Screening Tool (CJEST). Allow the use of local and state socio-economic data to offset the fact that CJEST and other screening tools, such as CDC's Social Vulnerability Index, are tied to the Census Block Level which may not be granular enough to detect disadvantaged communities. Develop qualitative methodologies to define eligibility. Validate socioeconomic data with communities and review and critically examine data to ensure its validity. Example: The University of Virginia UVA in Charlottesville, VA. The census tract that the school sits in (median income of about \$24K) brings down the average for the entire city. Without the UVA tract, the area median income is approximately \$75,000. Consider assessing eligibility beyond political boundaries. Make the connection to people with disabilities and other community members typically excluded from participation.
- **Engagement and project roles:** In cases where applicants are technical experts, prefer applicants who place community champions in leadership or co-governance roles within the project. Establish recommended "rules of engagement" between applicant leads partnering with community partners to set healthy expectations where resources are shared and provide guidance on the appropriate circumstances to solicit a letter of support. Provide more time and support for relationship development among partners between funding announcements and proposal submission deadlines.
- **Technical Assistance:** Coordinate with other federal agencies to provide targeted technical assistance for federal grant-making for equity-focused projects. Provide access to expanded technical assistance to disadvantaged communities for proposal development. Provide office hours with ECJ program managers to answer basic questions about application materials. Ensure that those office hours are accessible to those both with and without internet access.
- **Program delivery and evaluation:** Commit to communities and facilitate successful program delivery, not simply monitor grants. Build in planning phase where community members can undertake project identification and planning. Require applicants to develop evaluation plans but consider that time is needed to develop community-derived metrics. Consider that metrics may need to be finalized after the project is selected. Allow community-derived definitions of value and justice to determine benefit, not just market-based values easily quantified.

Recommendations regarding the rolling application process approach:

- Consider testing the extended application period process to determine if it results in increased and better-quality applications.
- Ensure that there is clear communication on when applicants would receive a response and when they might start funding a project.
- If conducting separate NOFOs, an application period longer than 45 days is recommended.

Recommendations regarding innovative techniques to replace portions of the written application process.

Overall, ASAP members agree that innovative techniques can be beneficial to disadvantaged communities. An oral presentation offers the opportunity for the review panel to send clarifying questions about the original application. Often, important decisions are made based on a static written application, and sometimes a confusing element can be easily clarified in any form of response - written, oral, or recorded, for the benefit of the review panel. Also, allowing for recorded responses to questions, submissions of media, and other forms of communication that convey the project in ways that are relevant and meaningful to the groups or communities applying can help lighten the application burden. However, grant opportunities may still be inaccessible because many communities may have less access to stable technologies, such as broadband. Also, regarding in-person presentations: this puts the burden of travel and more time away from regular duties on the applicant (in addition to travel expenses which must be covered in some way.)

Recommendations regarding eligible projects:

- Many of the communities that have been previously undocumented are also vulnerable to the effects of climate change and are in need of funding for projects that meet two goals: documentation of resources and planning for resilience and adaptation actions.
- Consider funding the launching of community-led climate resilience hubs in communities or neighborhoods that continue to be most impacted by inequitable and unjust systems that place them at a higher risk for negative impacts from climate hazards.
- Consider including a funding mechanism to compensate community members for participating in projects. Examples include: food, transportation, and childcare.
- Consider including funding mechanisms to compensate for appropriate translation services for materials and workshops in communities where English is not the primary language.

Challenges and barriers to connecting residents of disadvantaged, underserved, and under-represented communities to workforce opportunities:

- Transportation (to training facility, first 1-2 months to new job site).
- Childcare (cost, availability, hours).
- Credit checks/ background checks.

Types of jobs and career pathways EPA should prioritize to support environmental justice and climate priorities:

- Unions jobs in construction, public health, education, and housing.
- Career pathways to jobs that are gendered “female” (e.g. health, education, care work).
- Job training to support workers in addressing future climate conditions in their work.

Recommendations regarding criteria to support community-based organizations in accessing funding and ensure that projects are community-driven and avoid negative consequences:

- Allow grassroots organizations and coalitions that do not have 501c3 status to apply together as partners to provide expanded opportunities for community-based organizations to access funding.
- Allow or help grassroots organizations and coalitions to find a sponsoring non-profit that has the proper tax designation.
- Community-based nonprofit organizations should have a proven and positive history of working with the frontline communities they plan to partner with under the funding being requested.
- Ensure community engagement with the community in the proposed project area BEFORE the application is submitted.
- The leadership structure should be described and grassroots and a “bottom-up” structure should be emphasized to discourage tokenism and encourage capacity building.

What metrics should EPA use to track relevant program progress and outcomes?

- Community engagement should be meaningful and done throughout the lifecycle of the grant rather than a one time “check the box” approach.
- Monitor every engagement and have community rank against 0-6 stages in [“The Spectrum of Engagement to Community Ownership”](#) by Rosa Gonzalez, Facilitating Power. Define success as getting to level 6 “Defer to Community Ownership.”
- Consider designing metrics based on Community Benefits Agreements.

How should EPA manage statutory requirements that apply to construction projects such as [Davis Bacon prevailing wages](#), [Build America Buy America domestic preferences](#), and the [National Environmental Policy Act](#) in a way that minimizes burdens on funding recipients?

- Avoid awarding contracts to organizations outside of the community, city, state, or region of the project.
- Add requirement for meaningful engagement and hiring of local community expertise to develop Community Benefits Agreements.
- Add Small, Local, Emerging Minority and Women Business Enterprise hiring provisions to procurement, along with training or apprenticeship provisions.

Technical Assistance:

The following types of technical assistance would be most helpful in the context of this program:

- Grant writing
- Community engagement
- Guidance on best practices for engagement and power-shifting
- Additional time for communities to prepare
- Office hours for grant questions
- Simplify grant applications to avoid complex technical assistance needs

Additionally, EPA should consider funding local Technical Assistance capacity (ie local teams of green building design professionals, engineers, sustainability professionals, adaptation planners, biologist-ecologists, environmental consultants, and indigenous knowledge advisers) to provide their

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services in direct response to community member needs. Many organizations and individuals are well-suited to provide different types of technical assistance, such as:

- Trusted community-based organizations to conduct community engagement.
- Private sector professionals to undertake grant writing.
- BIPOC residents to share both technical expertise and lived experience.

It is a good idea to think outside the box about who can provide technical assistance, make sure that assistance is tailored to community needs and responds directly to community requests, and that providers are appropriately compensated.