

Environmental and Climate Justice Block Grant Program

IGAP Request for Information Snapshot

February 15, 2023

<u>Department:</u> Environmental Protection Agency	<u>Agency:</u> N/A
<u>Deadline for Comments:</u> March 17, 2023	<u>Docket Number:</u> EPA-HQ-OEJECR-2023-0023

Summary

EPA is soliciting feedback for the Environmental and Climate Justice Block Grant Program, which will provide funding for financial and technical assistance to carry out environmental and climate justice activities to benefit disadvantaged communities.

Background

Under the Inflation Reduction Act, Congress allocated \$3 billion to the EPA, \$2.8 billion for financial assistance and \$200 million for technical assistance. EPA must award grants and technical assistance under the ECP Program by September 30, 2026.

Financial Assistance Funding

Eligible Activities:

- Community-led air and other pollution monitoring, prevention, and remediation, and investments in low-and zero-emission and resilient technologies and related infrastructure and workforce development that help reduce greenhouse gas emissions and other air pollutants (greenhouse gas is defined as “air pollutants carbon dioxide, hydrofluorocarbons, methane, nitrous oxide, perfluorocarbons, and sulfur hexafluoride”);
- Mitigating climate and health risks from urban heat islands, extreme heat, wood heater emissions, and wildfire events;
- Climate resiliency and adaptation;
- Reducing indoor toxics and indoor air pollution;
- Facilitating engagement of disadvantaged communities in State and Federal advisory groups, workshops, rulemakings, and other public processes.

Eligible Recipients:

- A partnership between a community- based nonprofit organization and an Indian tribe, local government, or an institution of higher education;
- A community-based nonprofit organization; or
- A partnership of community-based nonprofit organizations.

Technical Assistance Funding

Technical assistance is aimed at supporting the eligible entities for the \$2.8 billion in grants to help them with activities related to the financial assistance grants.

Who Should Respond EPA encourages all potentially interested parties including individuals, associations, governmental and non-governmental organizations, academic institutions, non-profit and community-based organizations, Indian Tribes, and private sector entities to respond to this RFI.

- Response Guidelines**
- Please identify the question(s) you are responding to by topic and question number when submitting your comments.
 - While EPA is not imposing a page limit, they recommend responses and comments to be no longer than 15 pages.
 - EPA may publish any comment received to its public docket.
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Key Questions EPA is interested in responses to the questions listed below, but respondents are welcome to address as many or as few as they choose.

ECJ Program Design

- What should EPA consider in the design of the ECJ Program to ensure that the grants benefit disadvantaged communities?
- 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?
- EPA is considering a process where it issues a NOFO soliciting applications for projects under the five ECJ Program eligible activities described above (Section III) that allows applicants, on a rolling basis over an extended period such as 12 months, to apply for the funding activities they are interested in, when they are interested in applying, as opposed to applying under multiple separate NOFOs that have 45-day submission periods. What are your views on this approach?
- EPA is aware that applying for competitive Federal grants can be burdensome and that placing too much importance on written applications for projects to benefit disadvantaged communities may not be the best way to help communities address environmental justice challenges. EPA is considering innovative techniques to replace portions of the written application process, such as an approach where EPA would invite applicants whose initial written application scored well to then provide a 30–60-minute oral presentation discussing predetermined questions or sets of issues. The purpose of the oral presentation would be to replace portions of the written application process to streamline the grant competition process and expedite the delivery of assistance for disadvantaged communities. What are your thoughts on this approach?

Eligible Projects

- 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:
 - Community-led air and other pollution monitoring, prevention, and remediation, and investments in low-and zero-emission and resilient technologies and related infrastructure and workforce development that help reduce greenhouse gas emissions and other air pollutants (greenhouse gas is defined as “air pollutants carbon dioxide, hydrofluorocarbons, methane, nitrous oxide, perfluorocarbons, and sulfur hexafluoride”);
 - Mitigating climate and health risks from urban heat islands, extreme heat, wood heater emissions, and wildfire events;
 - Climate resiliency and adaptation;
 - Reducing indoor toxics and indoor air pollution; and
 - Facilitating engagement of disadvantaged communities in State and Federal advisory groups, workshops, rulemakings, and other public processes.

- With respect to the workforce development activities under category 1(a) above:
 - Please describe what you perceive as the most significant challenges and barriers to connecting residents of disadvantaged, underserved, and under-represented communities to workforce opportunities related to addressing environmental justice and climate change, and what programs, services, and partnerships are needed to address these challenges and barriers.
 - What types of jobs and career pathways should EPA prioritize to support environmental justice and climate priorities?
- What other types of projects should EPA consider under the eligible funding categories identified above (under 1) including those that may relate to addressing environmental and climate change issues caused by extreme weather conditions (e.g., cold weather) and how nature-based solutions can be used to address climate resiliency and adaptation as well as the other areas covered by the eligible funding categories? Also please describe how the projects you identify benefit disadvantaged communities.

Eligible Recipients

- Eligibility for the ECJ Program grants is limited to a partnership between a community-based nonprofit organization and an Indian tribe, local government, or institution of higher education; a community-based nonprofit organization; or a partnership of community-based nonprofit organizations.
 - What is and how should EPA define a “community-based nonprofit organization” for purposes of implementing ECJ Program funding?
 - What is and how should EPA define a “partnership” between a community-based nonprofit organization and an Indian tribe, local government, or institution of higher education for purposes of implementing ECJ Program funding?
- What characteristics and attributes do you think are important to the formation of a “partnership” for purposes of implementing ECJ Program funding?
- What criteria or requirements do you think are important to ensure that projects – particularly projects of partnerships between community-based nonprofit organizations and other eligible entities – are community-driven and result in benefits flowing to the community while avoiding consequences such as community displacement and/or gentrification?
- What are your thoughts on EPA sponsoring on-line forums or webinars to facilitate potential applicants’ ability to develop partnerships with other organizations and communities to submit applications for ECJ Program grants? How else can EPA be helpful in facilitating these partnerships?

Reporting and Oversight

- What types of governance structures, reporting requirements, and audit requirements (consistent with applicable Federal regulations) should EPA consider requiring of EPA grantees of the ECJ Program grants to ensure responsible and efficient implementation and oversight of grantee/sub-recipient operations and financial assistance activities?
- 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 ECJ Program?
- In what ways can EPA design the ECJ Program to reduce the reporting burdens on grantees and sub-awardees while also ensuring proper oversight of the grants?
- What metrics should EPA use to track relevant program progress and outcomes including, but not limited to, how the grants benefit disadvantaged communities?
- 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?

Technical Assistance

- 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?

- Which types of organizations and institutions are best suited to provide technical assistance?

General Comments

- Besides the questions above, do you have any other comments on the design, structure, and/or implementation of the ECJ Program including your views on ways EPA can simplify the application process for applying for the ECJ Program grants?
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How to Submit

- Responses must be received by 11:59 PM ET on March 17, 2023. Submit comments to the [Federal eRulemaking Portal](#) and follow the instructions on the website for submitting comments.
 - For further information, contact ECJRFI@epa.gov
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Resources

- [Docket - Regulations.gov](#)
- [Request for Information Document - Regulations.gov](#)
- [Environmental and Climate Justice Program Page - EPA](#)