

April 10, 2023

VIA ELECTRONIC FILING

Office of Environmental Justice and External Civil Rights
Environmental Protection Agency
ECJRFI@epa.gov

RE: Request for Information – Environmental and Climate Justice Block Grants

Attention: Docket No. EPA-HQ-OEJECR-2023-0023

The National Community Reinvestment Coalition (NCRC) appreciates the opportunity to comment on the Environmental Protection Agency (EPA) Office of Environmental Justice and External Civil Right’s Environmental and Climate Justice Block Grants (ECJ). NCRC and its over 700 grassroots member organizations create opportunities for people to build wealth. We work with community leaders, policymakers, financial institutions, and regulatory agencies to champion fairness and end discrimination in lending, housing, business, and the workforce.

This comment focuses on the workforce development questions offered by the EPA. Increasing job opportunities in the clean energy sector has tremendous potential to address income inequality in communities of color and other underserved communities. Workers in clean energy jobs earn higher and more equitable wages, with even the lowest-paying jobs offering a living wage throughout most of the country.¹ Higher paying jobs in the clean energy economy also tend to have lower educational requirements.² However, white men dominate many sectors within clean energy.³ To increase participation among underserved communities in the clean energy sector, the EPA should prioritize workforce development grants to programs that are the most accessible to underserved populations, that increase worker engagement in local decision-making, and that are likely to increase the chances of underserved individuals to secure high paying, stable, and environmentally sustainable employment. This letter goes on to describe how to achieve this while responding to the two questions the EPA asked regarding workforce development.

a. 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.

Multiple studies have found persistent barriers to employment for underserved communities. A study prepared by the National Fund for Workforce Solutions and others notes that:

“Workforce inequities arise from racial exclusion across a range of systems and institutions, and are deeply rooted in the nation’s history. Modern occupational segregation follows from the legacy of slavery and Jim Crow, polarized immigration policies, educational discrimination, and institutional racism in the workplace. And exclusions in fair labor standards leave millions and millions of workers unprotected by

¹ This was a finding from a Brookings Institution study that defined clean energy jobs broadly as jobs in three different economic sectors: clean energy production, energy efficiency, and environmental management.

“Advancing inclusion through Clean Energy Jobs.” Metropolitan Policy Program at Brookings. April 2019. Available online at https://www.brookings.edu/wp-content/uploads/2019/04/2019.04_metro_Clean-Energy-Jobs_Report_Muro-Tomer-Shivaran-Kane_updated.pdf#page=22

² Ibid.

³ “Green Jobs Report.” Environmental Justice Leadership Forum, facilitated by WE ACT for Environmental Justice. Available online at https://www.weact.org/wp-content/uploads/2020/12/FINAL-2_Green-Jobs-Report_Full-Report-Full-View.pdf

minimum wage, overtime, and other laws designed to protect working people. Concentrated unemployment, especially high among Black and Native American workers, is not only a result of hiring discrimination, but also an effect of broader disinvestment in communities of color and structural racism that makes people of color more likely to face systemic barriers to opportunity.”⁴

In order for the ECJ program to best address the systemic barriers that keep underserved communities from high-paying clean energy jobs, the EPA should prioritize workforce programs that are designed to be as accessible to underserved communities as possible. The first factor to consider is whether members of an underserved community lead the organization. On average, nonprofits led by people of color have smaller budgets to work with and are more likely to report lack of access and challenges securing financial support from a variety of funding sources.⁵ Disparities in support for organizations led by people of color lead to less services in underserved communities, and often result in the offering of services in these communities that are not helpful for people of color. The EPA should reverse this trend by prioritizing organizations whose executive staff and boards of directors are majority members of underserved communities. EPA should also engage in targeted outreach and marketing of programs to such organizations.

Workforce trainings should also be designed to ease the time commitment for trainees. These trainings often take several weeks to complete, and without additional support this can be impractical for many and create unequal outcomes. For example, gender imbalances in childrearing duties are driving women out of the workforce at three times the rate of male workers.⁶ This is why the EPA should encourage training programs to offer childcare. The EPA should also prioritize workforce trainings offered in underserved communities. The EPA should encourage applicants to discuss how they will use ECJ funds to provide transportation, which may need to take the form of providing gas cards or reimbursements in areas that lack public transportation. Applicants should also be encouraged to offer a stipend for time spent in training.

The EPA should also provide positive consideration for workforce programs that support individuals that have been involved with the criminal justice system. Inequities throughout our criminal justice system are well documented, and are evident in policing, arrests, quality of legal representation, convictions, and sentencing.⁷ Workforce development organizations say that previous involvement with the justice system does not have to be a significant barrier to employment, but that it is necessary to diffuse negative perceptions of these individuals in order for them to overcome the discrimination they face in securing employment.⁸ The EPA could improve the chances of justice involved individuals securing employment in the clean energy sector by providing positive consideration for organizations with a demonstrated track record at serving these individuals.

⁴ “Race and the Work of the Future: Advancing Workforce Equity in the United States.” National Fund for Workforce Solutions, PolicyLink, USC Dornsife Equity Research Institute, Burning Glass Technologies. 2020. Page 35. Available online at https://nationalfund.org/wp-content/uploads/2020/11/Race_and_the_Work_of_the_Future_United_States_FINAL.pdf

⁵ “Nonprofit Executives and the Racial Leadership Gap: A Race to Lead Brief.” Building Movement Project. 2019. Available online at https://www.buildingmovement.org/wp-content/uploads/2019/07/ED.CEO_Race_to_Lead_Brief_.pdf

⁶ “Parents Juggle Work and Child Care During Pandemic.” The United States Census Bureau (blog), August 18, 2020. Available online at <https://www.census.gov/library/stories/2020/08/parents-juggle-work-and-child-care-during-pandemic.html>

⁷ “Opinion | There’s Overwhelming Evidence That the Criminal Justice System Is Racist. Here’s the Proof.” Radley Balko. Washington Post. June 10, 2020. Available online at <https://www.washingtonpost.com/graphics/2020/opinions/systemic-racism-police-evidence-criminal-justice-system/>

⁸ “Green Jobs Report.” Environmental Justice Leadership Forum, facilitated by WE ACT for Environmental Justice. Page 20. Available online at https://www.weact.org/wp-content/uploads/2020/12/FINAL-2_Green-Jobs-Report_Full-Report-Full-View.pdf

Workforce programs should include services for workers with limited English proficiency (LEP). According to the American Community Survey, in 2019 8.5% of the labor force had LEP, totaling over 14 million workers.⁹ Applicants should be instructed to discuss how they would ensure services are tailored and available to speakers of different languages in their specific communities.

The Labor Department notes “that LEP workers are disproportionately likely to experience workplace violations, like wage theft.”¹⁰ Discrimination in the construction industry is also well documented, and there are recent examples of discrimination in the solar industry.¹¹ EPA should encourage workforce programs to include wrap around legal services that can increase workers understanding of their rights and how to address issues of wage theft and hostile work environments. These services should also be available to LEP workers given that these workers are more likely to experience these types of violations.

The EPA should also encourage workforce programs designed to foster greater engagement of underserved workers in local decision-making. EPA should give positive consideration to workforce development programs that include working with participants to understand the root causes of challenges in their community, uncover the impact on local workers, and develop strategies to create positive change. The best programs will also work with workers to discuss how patterns of accumulated advantages and disadvantages are codified in laws, policies, regulations and other system behaviors, and help workers build confidence in discussing root causes and seeking solutions. This will ensure that workforce development programs also advance the EPA’s goal of facilitating engagement of disadvantaged communities in state and federal advisory groups, workshops, rulemakings, and other public processes.

Finally, the EPA should also consider working with the Occupational Safety and Health Administration (OSHA) to waive fees for OSHA training cards for individuals in ECJ supported workforce trainings. WE ACT finds that “thirty-hour OSHA training cards are a requirement for most construction jobs, and the training typically costs more than \$350.00. These costs should not be allowed to dissuade or deter the participation of individuals with low incomes because they cannot afford the fees.”¹²

b. What types of jobs and career pathways should EPA prioritize to support environmental justice and climate priorities?

The National Fund for Workforce Solutions and others define “good jobs” as “those that provide a reasonable expectation of job stability, insulation from existential forces like automation and offshoring, and family-sustaining compensation.”¹³ This report also goes on to identify that people of color are under

⁹ “Department of Labor Equity Action Plan: Equity Action Plan for Improving Language Access.” Available online at <https://www.dol.gov/general/equity-action-plan/plan#6>

¹⁰ Ibid.

¹¹ “How racism manifests in clean energy,” GreenBiz. June 5, 2020. Available online at <https://www.greenbiz.com/article/how-racism-manifests-clean-energy> and “It Seemed Like a Model Green Energy Firm. But Black Workers Paint a Different Picture,” New York Times. May 6, 2019. Available online at <https://www.nytimes.com/2019/05/06/nyregion/momentum-solar-racial-discrimination-lawsuit.html> and “Vivint CEO ‘deeply disturbed’ by allegations that employees built racist fort.” Washington Post. June 14, 2018. Available online at <https://www.washingtonpost.com/news/innovations/wp/2018/06/14/vivint-ceodeeply-disturbed-by-allegations-that-employees-built-racist-fort/>

¹² “Green Jobs Report.” Environmental Justice Leadership Forum, facilitated by WE ACT for Environmental Justice. Page 26. Available online at https://www.weact.org/wp-content/uploads/2020/12/FINAL-2_Green-Jobs-Report_Full-Report-Full-View.pdf

¹³ “Race and the Work of the Future: Advancing Workforce Equity in the United States.” National Fund for Workforce Solutions, PolicyLink, USC Dornsife Equity Research Institute, Burning Glass Technologies. 2020. Page 28. Available online at https://nationalfund.org/wp-content/uploads/2020/11/Race_and_the_Work_of_the_Future_United_States_FINAL.pdf

represented in these jobs. As previously discussed, most jobs in the wide fields of clean energy production, energy efficiency, and environmental management meet this definition. Furthermore, the solar installer and wind turbine technician workforces, occupations that pay better than the national average and do not require college degrees, are projected to grow by 52 percent and 68 percent respectively by 2030, far outpacing the national average for job growth.¹⁴

The National Resources Defense Council has identified residential energy efficiency as the largest source of potential CO2 reductions.¹⁵ The EPA should offer positive consideration for workforce development in the field of weatherization, such as insulation and air sealing. Most Americans, and especially households with low-and-moderate incomes, live in older homes and energy bills are a substantial burden for low-income households.¹⁶ Insulation and air-sealing jobs also have less material and equipment costs than solar panels or HVAC systems, indicating that project expenses focused on insulation and air-sealing are distributed more towards compensating workers and put more money into local economies.

Conclusion

The ECJ program should address long-standing disparities in access to good jobs, such as jobs in the clean energy sector. Racial income inequality is estimated to deprive our economy of \$2.3 trillion a year, which will only increase as the country and workforce rapidly becomes more diverse.¹⁷ To reverse this, the ECJ program must be careful to support organizations that have the highest potential to increase workforce opportunities for underserved communities, and encourage the design of workforce development programs that are as accessible as possible and increase worker engagement around local decision-making.

If you have any questions about this comment, please contact Kevin Hill, NCRC Senior Policy Advisor, at khill@ncrc.org.

Sincerely,



Jesse Van Tol
President and CEO
National Community Reinvestment Coalition

¹⁴ “Three Ways to Advance Racial Equity in the Workforce while Combating Climate Change.” Urban Institute. March 11, 2022. Available online at <https://www.urban.org/urban-wire/three-ways-advance-racial-equity-workforce-while-combating-climate-change>

¹⁵ “Residential Energy Efficiency is Largest Source of CO2 Reduction Potential.” NRDC. October 5, 2017. Available online at <https://www.nrdc.org/bio/khalil-shahyd/residential-energy-efficiency-largest-source-co2-reduction-potential>

¹⁶ “The U.S. needs better, more accessible home weatherization programs.” Brookings Institution. October 10, 2022. Available online at <https://www.brookings.edu/blog/the-avenue/2022/10/10/the-u-s-needs-better-more-accessible-home-weatherization-programs/>

¹⁷ “Race and the Work of the Future: Advancing Workforce Equity in the United States.” National Fund for Workforce Solutions, PolicyLink, USC Dornsife Equity Research Institute, Burning Glass Technologies. 2020. Page 7. Available online at https://nationalfund.org/wp-content/uploads/2020/11/Race_and_the_Work_of_the_Future_United_States_FINAL.pdf



CC
National Environmental Justice Advisory Council
nejac@epa.gov