UCLA Luskin Center for Innovation

PATHWAYS *to* ADVANCE EQUITY *in* FEDERAL PROGRAMS

Opportunities for Integrating California's Strategies for Equitable Climate Investments

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DISCLAIMER

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EXECUTIVE SUMMARY

In the face of climate change and ongoing environmental racism,[1] the federal government and the State of California are engaged in parallel missions to invest in reducing environmental harms while uplifting pollution-burdened communities.

At the federal level, the Biden administration's Justice40 Initiative mandates that disadvantaged communities receive at least forty percent of the benefits of certain federal investments.[2] Executive branch agencies are now working to meet Justice40 goals through their programs and investments. This work comes as the Bipartisan Infrastructure Law of 2021 and the Inflation Reduction Act of 2022 have provided over $500 billion in funding for environment- and climate-related programs, providing an unprecedented opportunity to advance environmental justice.[3]

As the federal government works to ensure that benefits are more equitably distributed throughout the country, it can learn from many state-level strategies and actions—especially from California, which has made significant progress in focusing investments in disadvantaged communities over the past decade.[4] Our client, the California Strategic Growth Council (SGC), administers the Transformative Climate Communities program (TCC), a competitive grant program that invests in climate, economic, and health benefits for communities facing environmental and economic burdens.[5] SGC is working to help federal agencies achieve more equitable investment outcomes, in part by incorporating design features of TCC into climate equity investments throughout the country.

To inform SGC's federal engagement efforts, we explore how agencies with Justice40-covered programs can adopt SGC's equity-focused practices for place-based, community-driven climate programs to achieve more just investment outcomes. We identify opportunities for SGC to support federal agencies' Justice40 goals, highlighting where there is potential to incorporate TCC features.

We use several methods to address our research question, including interviews with federal government officials and SGC staff; a survey of federal employees; and an analysis of department websites, strategic plans, and other materials concerning Justice40 and environmental justice efforts.

1 Environmental racism is defined as a form of systemic racism that disproportionately burdens people and communities of color with health hazards that are the result of targeted policies and practices, forcing them to live in proximity to toxic waste. For example, a low-income community that is situated next to a coal-power plant or near an airport with direct flight paths overhead. See World Economic Forum, "What Is Environmental Racism and How Can We Fight It?"

2 The White House, "Executive Order on Tackling the Climate Crisis at Home and Abroad."

3 The White House, "Fact Sheet: The Bipartisan Infrastructure Deal" and US Senate Committee on Environment and Public Works, "Inflation Reduction Act of 2022."

4 Callahan et al, Making Justice40 a Reality for Frontline Communities.

5 California Strategic Growth Council, "Assembly Bill No. 2722."

TCC FEATURES UNDERPINNING OUR ANALYSIS

We base much of our analysis on eight core features of TCC, each of which is designed to make the outcomes of TCC more equitable for communities receiving funds:

- **Place-Based:** TCC investments target individual neighborhoods, funding projects tailored to the needs of that specific area.[6]
- **Community-Driven:** TCC places decision-making power in the hands of local organizations, residents, and community stakeholders, empowering them to decide how to spend funds.
- **Collaborative Governance:** Local community organizations and residents participate in a collaborative, representative governance body to oversee TCC grant planning and implementation.
- **Multi-Benefit Projects:** TCC projects are designed to meet multiple, integrated objectives (such as reducing greenhouse gas emissions, improving public health, and strengthening the local economy).
- **Transformative Plans:** TCC grantees create community engagement, displacement avoidance, and workforce development plans to avoid unintended consequences, give community members a say in the process, and maximize benefits.
- **Technical Assistance and Capacity Building:** TCC provides external consultation and supports community members and organizations to develop internal knowledge and expertise.
- **Interagency Coordination and Collaboration:** TCC is a cross-sectoral program that involves several different state agencies. SGC's role in coordinating the activities of state agencies helps to maximize benefits and avoid redundancy.
- **Ongoing Program Evaluation:** TCC allocates funds for evaluation to measure program success, inform future efforts, and ensure transparency and accountability.

FINDINGS AND RECOMMENDATIONS

We identify five agencies and fourteen programs for SGC to target. These agencies and programs have the most potential for shared-learning with SGC and for incorporating features of TCC. The top five agencies are the Department of Health and Human Services, the Department of Housing and Urban Development, the Department of Energy, the Department of Transportation, and the Environmental Protection Agency. We look at each of these top agencies holistically, and list key offices for SGC engagement, note any target programs, and describe overarching themes from our document analysis and interviews that can inform SGC's engagement. Additionally, we present a brief synopsis of each target program, as well as our recommendations for SGC's potential engagement of each program.

6 California Strategic Growth Council, "Transformative Climate Communities."

TABLE 1

Target Programs

Program	Agency
Appalachian Regional Commission Grants	Appalachian Regional Commission
Building Resilient Infrastructure and Communities (BRIC) Program	Federal Emergency Management Agency
Choice Neighborhoods	Department of Housing and Urban Development
Communities Local Energy Action Program (LEAP)	Department of Energy
Community Development Block Grant	Department of Housing and Urban Development
Community Economic Development (CED)	Department of Health and Human Services
EJ Office (Environmental and Climate Justice Block Grants)	Environmental Protection Agency
Indian Community Development Block Grants	Department of Housing and Urban Development
Land and Water Conservation Fund	Department of the Interior
Office of Community Revitalization	Environmental Protection Agency
Rebuilding America's Infrastructure with Sustainability and Equity (RAISE)	Department of Transportation
Thriving Communities Program	Department of Transportation
Transit-Oriented Development (TOD) Planning Program	Department of Transportation
YouthBuild Program	Department of Labor

FINDINGS FROM INTERVIEWS AND SURVEYS

In addition to identifying specific agencies and programs for SGC to target, we identify five overarching themes from the interviews with federal staff.

- There is a disconnect in the federal government regarding the definitions of key terms used in federal programs.
- Some features of TCC were difficult for federal employees to distinguish between, which may create barriers in effective communication from SGC.

- The difficulties experienced with implementing ongoing program evaluation create barriers to improving current and future federal programs.
- There is a need for consolidated and improved data tools for identifying and targeting disadvantaged communities.
- There are important differences between California's state requirements and the federal government's requirements concerning environmental justice and supporting disadvantaged communities.

RECOMMENDATIONS FOR SGC

Based on our findings, we recommend several broad actions for SGC to take to further its federal engagement:

- SGC can enhance communication with federal agencies by defining TCC features clearly and unambiguously—particularly collaborative governance. As SGC encourages program staff to include collaborative governance structures, it will be helpful to have clear definitions and concrete examples of what that could mean for federal programs.
- SGC can support the development or improvement of a data tool for federal agencies to identify and prioritize disadvantaged communities. SGC can work with the White House to create a single data tool that identifies disadvantaged communities in specific program areas and prioritizes those communities so the most underserved communities are supported first.
- SGC can support a more unified understanding of environmental justice tenets, including definitions of key terms, by advocating for overarching training for federal employees. SGC could consider engaging overarching federal offices to work toward more consistent definitions or advise training for employees across various federal agencies.
- SGC should prioritize shared-learning opportunities with federal agencies and smaller equity-focused organizations to avoid overburdening communities. By prioritizing shared learning or peer-to-peer learning with federal agencies and nonprofit organizations involved in TCC projects, SGC can better understand the barriers faced by communities and learn how to address those barriers.
- In addition to the executive branch, SGC should consider engaging the legislative branch to utilize the power of Congress to incorporate TCC features into the statute governing programs, as well as to dedicate more funding for place-based, community-driven programs. To work toward programs that truly replicate the TCC model, SGC should consider engaging members of Congress to integrate TCC features into—and expand beyond—existing Justice40 covered programs.

Our research shows that many federal programs have potential to incorporate features of TCC, several agencies are conducting work that aligns with SGC's, and many federal employees are interested in learning strategies to advance equity.

I. INTRODUCTION AND BACKGROUND

In the face of climate change and ongoing environmental racism,[1] the federal government and the State of California are engaged in parallel missions to invest government dollars in reducing environmental damage while uplifting communities overburdened for decades by pollution, such as those located near coal-fired power plants or oil refineries.

In the Biden Administration's push to center climate change in federal policy, promoting environmental justice was a primary focus. The president announced the Justice40 Initiative: a mandate that the most pollution-laden, under-resourced, "disadvantaged" communities would receive at least forty percent of the benefits of certain federal investments.[2]

As of August 2022, the Justice40 mandate covered over 450 federal programs, administered by 16 agencies (as listed on page 4).

I.I. OUR CLIENT

The California Strategic Growth Council (SGC) is a cabinet-level, interagency body within the State of California. SGC coordinates the activities of state agencies in a range of areas, including community revitalization, climate, and more.

SGC's interdisciplinary nature positions it to implement programs that achieve a wide variety of goals. One of its flagship programs, Transformative Climate Communities (TCC)—a competitive grant program that funds "the development and implementation

1 Environmental racism is defined as a form of systemic racism that disproportionately burdens people and communities of color with health hazards that are the result of targeted policies and practices, forcing them to live in proximity to toxic waste. For example, a low-income community that is situated next to a coal-power plant or near an airport with direct flight paths overhead. See World Economic Forum, "What Is Environmental Racism and How Can We Fight It?"

2 The White House, "Executive Order on Tackling the Climate Crisis at Home and Abroad."

DEFINING "EQUITY" AND "DISADVANTAGED COMMUNITIES"

Equity refers to the fair and just treatment of all people and specifically calls for identifying and actively supporting communities that have historically been denied the resources and treatment they need to thrive.[a] As outlined in California's Adaptation Planning Guide, equitable treatment requires accounting for disproportionate burdens, uneven resource allocation, and historical harms by working toward accessible civic engagement for those who have been systematically excluded, centering communities on the frontlines of climate change in decision making, addressing systemic inequality, and more.[b]

"Disadvantaged community" refers to residents of geographic areas facing disproportionate "economic, health, and environmental burdens."[c] There are several other terms used for similar purposes. For example, "environmental justice community" refers to residents of areas facing disproportionate pollution and environmental hazards, while the term "frontline community" refers to people living in the areas facing the most immediate, harmful effects of climate change.[d] The State of California uses the term "priority populations," which encapsulates disadvantaged and low-income communities, to prioritize investments.[e]

All of these terms, and more, are used by policymakers, advocates, and other stakeholders. Here, we use the term "disadvantaged community," which is used for Justice40 purposes. We do not claim that it is necessarily the *best* term to use.

a The White House, "Executive Order on Further Advancing Racial Equity."

b California Office of Planning and Research, "Climate Equity."

c California Public Utilities Commission, "Disadvantaged Communities."

d California Environmental Justice Alliance, "Defining Environmental Justice Communities" and Care About Climate, "What Is a Frontline Community?"

f Caltrans, "Priority Populations and Disadvantaged Communities."

of neighborhood-level transformative climate community plans, including multiple, coordinated greenhouse gas emissions reduction projects which provide local economic, environmental, and health benefits to disadvantaged communities."[3]

Building largely on lessons learned from the first few years of TCC implementation, SGC has created a framework intended to guide government spending—whether at the local, state, or federal level. The framework is designed to help governments invest their resources in ways that serve disadvantaged communities while maximizing the societal benefits of each dollar spent. Amid unprecedented levels of federal investment in climate-related programs, SGC and its programs have now reached a point of maturity where it is able to share tested policy models to support program administrators and funders in addressing disparities and catalyzing equitable investment in under-resourced communities.

I.2. OUR PROJECT

We focus on understanding how federal agencies can adopt TCC's key features to achieve Justice40's equity objectives, as well as highlight opportunities for SGC to learn from federal agencies' current Justice40 work. Our analysis supports SGC's engagement strategy to share key features of TCC with federal executive branch agencies. We identify the most promising opportunities for SGC to engage federal agencies and communicate TCC features by highlighting programs with the greatest opportunity to implement these features and ultimately achieve more equitable outcomes.

One overarching policy question guided our work: **What are the best opportunities for the California Strategic Growth Council to collaborate with federal agencies and encourage the adoption of its equity-focused program features to achieve more just investment outcomes?** To address this question, we identified three sub-questions:

- Which federal agencies and programs have the most potential to incorporate features of TCC?
- Which features of TCC are federal agencies most willing to incorporate into their current programs, and what additional actions can they take to achieve Justice40 goals based on the features of TCC?
- What opportunities and barriers do federal agencies face in adopting the core features of TCC for equity-oriented, place-based climate investments?

I.3. THE SCOPE OF OUR WORK

This report presents the results of engagement with federal agency staff and research regarding federal programs and investments. Our primary objective is to support SGC staff as they work to engage the federal government and share their knowledge to

3 California Strategic Growth Council, "Assembly Bill No. 2722."

Residents vote at a TCC community meeting in Fresno, CA—one of the first grantee communities. California Strategic Growth Council, 2023

increase equity in federal programs. We also offer this work as a guide for federal employees interested in implementing equity-focused investment strategies.

While we use Justice40 and TCC as helpful frameworks to structure our analysis, our study is not focused on the merits of either initiative. Justice40 is used as the current policy framework that federal agencies are using to meet goals and requirements, but this project is also relevant to any efforts to make federal programs more equitable using SGC's policy models.

We use TCC as a case study of SGC's work; we are not evaluating TCC on its merits or effectiveness: other researchers are conducting an ongoing program evaluation that is far outside of our project's scope.[4]

I.4. THE STRUCTURE OF THIS REPORT

To begin answering our research questions, in section 2, we explore the policy context that drives SGC's federal engagement and lay out our conceptual framework for analysis. In section 3, we describe the TCC features in detail as they are the core drivers of our data collection. By focusing on TCC's features in the interviews and surveys, the project has been framed around how SGC can engage federal agencies through their current and potential use of TCC features. In Section 4, we outline our methodology for data collection and analysis. Section 5 reports the agencies and programs we found to have the most potential for shared learning with SGC; Sections 6 and 7 present overarching findings and recommendations from our analysis that cut across agencies.

4 One of the official TCC evaluators is the UCLA Luskin Center for Innovation, which provided consultation and advising throughout this project.

2. POLICY CONTEXT: STRATEGIC GROWTH COUNCIL, TRANSFORMATIVE CLIMATE COMMUNITIES, AND JUSTICE40

This section provides context on the current landscape of federal investments in environmental justice and climate change. We describe and compare the Strategic Growth Council (SGC) to the federal government, highlighting key differences between them. We also give a deeper overview of the Transformative Climate Communities (TCC) program.

2.I. JUSTICE40 AND THE CURRENT FEDERAL FUNDING OPPORTUNITY

The Biden Administration's Justice40 initiative outlines the goal that forty percent of the benefits of specific federal investments be channeled to disadvantaged communities bearing a disproportionate pollution burden.[5] The Justice40 initiative is derived from an executive order which could result in it being overturned by the next presidential administration. Nevertheless, Justice40 defines several categories of investments, including "climate change, clean energy and energy efficiency, clean transit, affordable and sustainable housing, training and workforce development, remediation and reduction of legacy pollution, and the development of critical clean water and wastewater infrastructure."[6] As of August 2022, there were 454 programs covered by Justice40.[7]

Programs can achieve Justice40 goals by reallocating funding from existing sources and incorporating new funding from the Inflation Reduction Act, the Bipartisan Infrastructure Law (BIL), and other sources. Justice40 specifically includes investments

5 The White House, "Justice40 Initiative."

6 The White House, "Justice40 Initiative."

7 The White House, "Justice40 Initiative Covered Programs List."

AGENCIES WITH JUSTICE40-COVERED PROGRAMS

Justice40-covered programs are chosen based on their work within the seven topic areas chosen by the Biden administration. Agencies with programs selected to be part of the Justice40 initiatives are listed below, along with the acronyms and abbreviations we use throughout the report.

- Department of Health and Human Services (HHS)
- Department of Housing and Urban Development (HUD)
- Corporation for National and Community Service (AmeriCorps)
- Department of Agriculture (USDA)
- Appalachian Regional Commission (ARC)
- Denali Commission (Denali)
- Department of Energy (DOE)
- Delta Regional Authority (DRA)
- Environmental Protection Agency (EPA)
- Department of State
- Department of Labor (DOL)
- Department of Transportation (DOT)
- Department of the Interior (DOI)
- Department of Defense (DOD)
- Department of Veterans Affairs (VA)
- Federal Emergency Management Agency (FEMA)

categorized as "grant or procurement spending, financing, staffing costs, or direct spending or benefits to individuals for a covered program in a Justice40 category."[8] The executive order does not establish a deadline or penalty for not achieving Justice40 goals.[9]

Federal agencies working toward Justice40 goals are following interim guidance that the White House published in 2021, which may be replaced by updated guidance in the near future.[10] While Justice40 and the Biden administration's equity-focused agenda have framed our analysis, our findings can be applied to any federal program to further equity goals. Our findings are relevant for federal programs and agencies, regardless of executive order requirements, as they are meant to result in more equitable practices.

Strategies to achieve equitable investment outcomes are particularly important given the current abundance of federal funding for programs and investments that fall under the Justice40 umbrella. The Bipartisan Infrastructure Law of 2021 and the Inflation Reduction Act of 2022 collectively provide over $500 billion in funding for climate action projects and programs that relate to Justice40 topics.[11]

2.2. COMPARING SGC AND THE FEDERAL GOVERNMENT

The State of California and the federal government are engaged in parallel missions to reduce environmental harms while uplifting pollution-burdened communities. Through Justice40, the federal government has demonstrated a commitment to centering equity in their climate action. In California, SGC has been working toward the same goal through programs like TCC. These similar goals show compatibility and promise for collaboration. However, there are also key differences between SGC and federal agencies, and more broadly between the political landscape in California and the country as a whole.

SGC is an interdisciplinary organization that was created with the specific purpose of coordinating across state government bodies and sectors. It is composed of council members representing seven state agencies, as well as the governor and state legislature.[12] These qualities put SGC in a strong position to advance cross-cutting initiatives like TCC or Justice40. SGC is an uncommon body in that it is a single entity that administers grants with the specific intent of addressing problems and creating benefits across multiple economic sectors. SGC gains political leverage through this grant administration and its uniquely designed representation across multiple state agencies.

8 The White House, "Justice40 Initiative."

9 The White House, "Executive Order on Tackling the Climate Crisis."

10 One FEMA interviewee noted that "federal agencies are working from Interim Guidance […] and are eager to receive the final guidance." See also Young, Mallory, and McCarthy. "Interim Implementation Guidance for the Justice40 Initiative."

11 The White House, "Fact Sheet: The Bipartisan Infrastructure Deal" and US Senate Committee on Environment and Public Works, "Inflation Reduction Act of 2022."

12 Governor's Office of Planning and Research; Department of Food and Agriculture; Business, Consumer Services and Housing Agency; Natural Resources Agency; California Environmental Protection Agency; Health and Human Services Agency; and State Transportation Agency

In this way, the federal government is not like SGC. With nine offices in the Executive Office, fifteen cabinet-level departments, and hundreds of other entities, the executive branch is a behemoth that cannot necessarily achieve the same goals as a smaller, interdisciplinary-by-design state body like SGC.[13] Among the cabinet-level departments, none is interdisciplinary in the way that SGC is. Within the Executive Office of the President, there are several cross-cutting offices that may be able to play a similar role to SGC's in California, including the three agencies in charge of guiding Justice40 implementation: the Council on Environmental Quality (CEQ), the Climate Policy Office (CPO), and the Office of Management and Budget (OMB).[14] However, these entities are not administering grants and designing programs.

2.3. TRANSFORMATIVE CLIMATE COMMUNITIES (TCC) DESIGN AND HISTORY

TCC's program design combines several features intended to advance environmental, racial, and other forms of equity. These features are not individually unique to TCC, but as far as we can tell from our research, it is the only program in the United States that combines all of these features into a single government investment program.

Part of TCC's strength as an approach to addressing environmental injustice comes from its strong and explicit foundation in California state law. TCC was established through legislation with Assembly Bill 2722, making it part of California statutory law.[15] This statutory grounding ensures that the program is less transient than an initiative like Justice40, which is based on an individual administration's priorities. TCC was designed with the goal of benefiting disadvantaged communities, and many different features of the program are intended to help the initiative reach this goal equitably. For the sake of this project, we highlight eight of these thirteen features, drawing on definitions and motivation laid out in the TCC program guidelines published by SGC.[16]

2.4. CONCEPTUAL FRAMEWORK FOR ANALYSIS

Having described the context surrounding this work—SGC and TCC, the federal government and Justice40—in this section, we lay out how each piece fits into our analysis and helps us toward our primary goal. In Figure 1, we summarize the relationships among the government entities and initiatives we have analyzed.

The federal government can learn from many state-level strategies and actions, as laid out in the UCLA Luskin Center for Innovation's 2021 report, *Making Justice40 a Reality for Frontline Communities*.[17] We focus on lessons from California because it was the first state to implement a large climate investment initiative. Over the past decade, the state has made significant progress in focusing investments in disadvantaged communities.[18]

13 USA.gov, "Branches of the US Government."

14 Young, Mallory, and McCarthy. "Interim Implementation Guidance for the Justice40 Initiative."

15 California Strategic Growth Council, "Assembly Bill No. 2722."

16 California Strategic Growth Council, "TCC Round 5 Program Guidelines."

17 Callahan et al, Making Justice40 a Reality for Frontline Communities.

18 Callahan et al, Making Justice40 a Reality for Frontline Communities.

California has the longest-running history of multi-faceted, long-term approaches to climate policy of any state; it presents a breadth of experience that the federal government can learn from. We use TCC as a basis for our analysis. TCC is informed by California's previous successes and failures in climate programs and can serve as a blueprint for cross-sectoral, place-based equity initiatives.

FIGURE 1

Conceptual framework: How the pieces fit together

3. FEATURES OF TCC

Listed below is each feature, along with our definition and any advantages or disadvantages of the feature, based on findings from relevant literature and recommendations on Justice40 implementation from the White House Environmental Justice Advisory Committee (WHEJAC).[19] This section examines each feature not only as it appears in the TCC context, but more broadly, drawing on a review of the academic literature about each feature.

3.I. PLACE-BASED

The term place-based has varying definitions, some of which overlap with definitions of "community-driven," the next feature on the list.[20] In the context of this project, we differentiate loosely between the terms by thinking of place-based programs as focused on a specified project area, usually at the city scale or smaller, and community-driven programs as those in which local community members lead the decision making about how funds are spent.

In the TCC context, place-based means "neighborhood-scale"—the grants fund projects within specific neighborhoods, and projects are tailored to the needs of that specific area.[21] TCC's neighborhood-scale projects allow for increased community engagement and the incorporation of local residents' knowledge, which increases equitable decision making because community members have instrumental participation in the project.[22]

In a 2022 study, Horwath, Lane, and Slevin describe the broad advantages of using a place-based approach and how it returns power to communities that inherently know their issues best and may have suffered more environmental concerns due to the decisions of others. They explain that a place-based approach is beneficial because it incorporates the views of the people who live and work in that place, which is important because the "needs or challenges of each place are different."[23] As they state, "it builds better engagement and relations to people in those places if you get to understand [their lives], and not just paint them all with the same brush."[24]

19 The WHEJAC advises the Council on Environmental Quality and other White House offices responsible for the implementation of Justice40. See White House Environmental Justice Advisory Council, "Justice40 Initiative Implementation."

20 For one example, "long-term commitments to specific jurisdictions (cities, towns, or neighborhoods) that strive to achieve better results for [disadvantaged communities]." See John T. Gorman Foundation, "Place-Based Initiatives." For another example, models that encourage "collaborative and integrated approaches to make holistic improvements" to a specified area. See California State Assembly Committee on Jobs, Economic Development, and the Economy, "Place-Based Strategies for Inclusive Development."

21 California Strategic Growth Council, "Transformative Climate Communities."

22 California Strategic Growth Council, "TCC Round 5 Program Guidelines."

23 Slevin, Addressing the Climate Crisis.

24 Slevin, Addressing the Climate Crisis.

However, to be effective, programs must truly engage people in local communities. In a 2016 study, researcher Hannah Reid explains that the phrasing "community-based adaptation" or "community-based or place-based" is sometimes used as a facade by organizations to secure funding.[25] She notes that some organizations even re-label development as a community-based adaptation to get funding from climate-focused donors. This practice can result in federal or state agencies focusing on obtaining funding more than working toward equity goals.[26] However, initiatives like Justice40, which require a certain amount of investments go toward disadvantaged communities, can reduce this potential for fabrication. In a 2015 study, William Lambe describes the pitfalls of poorly executed place-based programs and outlines best practices for avoiding them, many of which overlap with core features of TCC.[27]

3.2. COMMUNITY-DRIVEN

Uplifting a community's power over project creation and implementation helps to achieve the principles of transparency, participation, enhanced local capacity, and local empowerment.[28] Throughout its Justice40 recommendations, the WHEJAC calls for programs to be led by communities, stating that "in the absence of community participation and leadership, well-meaning programs have the potential to further concentrate pollution and inequity in the very places they are intended to support."[29] TCC places power in the hands of community-based organizations and empowers them to design and run their own projects. In a 2022 study, Schreuder and Horlings explain that much of the literature on place-based and community-driven projects "suggests that leadership plays a key role in developing place-based transformations to climate change and sustainability problems, supporting capacity building, 'inner' transformation and scaling of successful practices."[30]

The structure of TCC grants requires direct leadership from community members, as the projects the grants fund are largely designed by the communities they aim to serve.[31] However, even this model may not be perfectly equitable: some communities will have more resources to apply for grants than others, and even within a community, some individuals will have more control than others. As described below, TCC's collaborative governance structure helps to address some of the potential power imbalance.

25 Reid, "Ecosystem- and Community-Based Adaptation."

26 Reid, "Ecosystem- and Community-Based Adaptation."

27 Lambe, "The Role of Place-Based Initiatives in Community Development."

28 Yuen et al., "Guide to Equitable, Community-Driven Climate Preparedness Planning."

29 White House Environmental Justice Advisory Council, "Justice40 Initiative Implementation."

30 Schreuder and Horlings, "Transforming Places Together."

31 It is important to distinguish between a program that is truly community-driven and one that has strong community engagement. Truly community-driven programs are crucial for achieving equity goals because people who live in disadvantaged communities are experts on their own needs and wants—they will know best what projects will help their community the most.

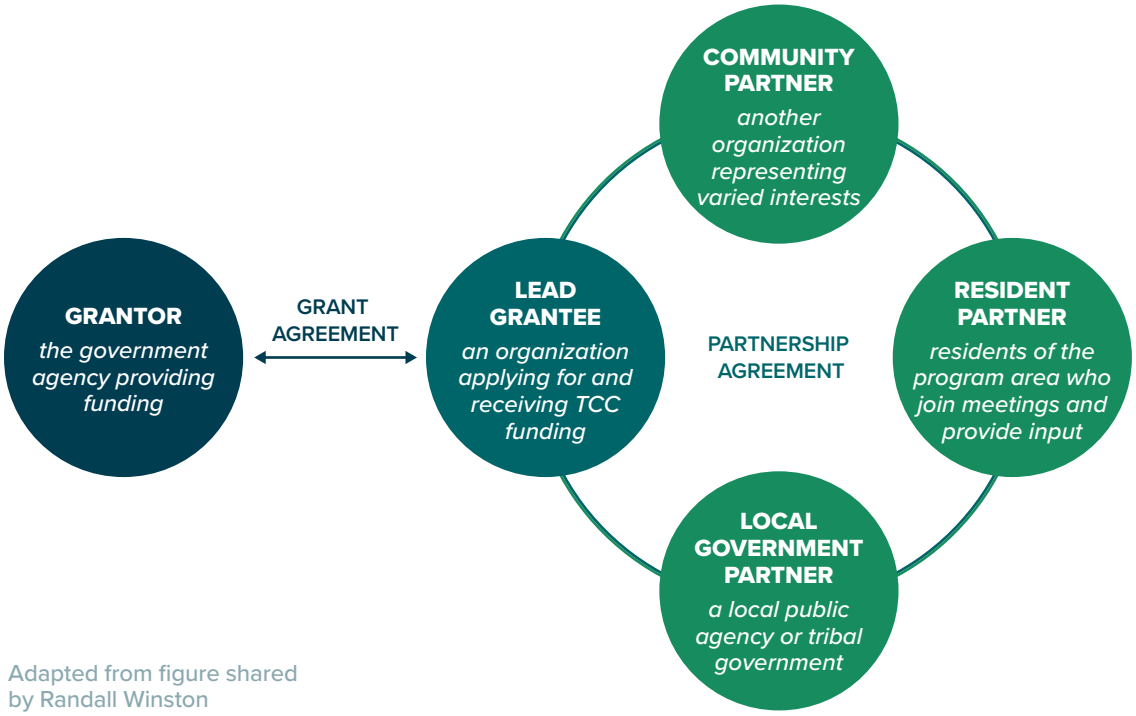
3.3. COLLABORATIVE GOVERNANCE

Within TCC, collaboration among local entities in a grantee community has established strong networks through connections with representatives from local entities such as public agencies, community-based organizations, and residents. A formal collaborative governance structure (Figure 2) helps to ensure that the community members leading a project make decisions based on the interests of the entire community, rather than a faction within it.

In the context of TCC, a collaborative governance structure enables community members to participate in a collaborative, representative governance body to oversee planning and implementation. The stakeholder structure is created by the community and regulated by a governmental body to ensure collaboration is occurring across communities and local governments. The community creates a partnership agreement that explains and outlines the stakeholder structure and the process for awarding stipends to community members and organizations involved in the project planning and implementation process. Figure 2 outlines an example of what this structure could look like.

FIGURE 2

A Generalized Example of a Collaborative Governance Structure



Adapted from figure shared by Randall Winston

3.4. MULTI-BENEFIT PROJECTS

TCC grantee communities are required and encouraged to select and design projects that will meet multiple, integrated objectives (i.e. reducing greenhouse gas emissions, improving public health, and strengthening the local economy). Multi-benefit projects within the TCC program can provide more improvements for disadvantaged communities for each dollar spent. If a program prioritizes project applicants who successfully describe the multiple benefits their project can produce, they are more likely to receive competitive grant funds.

However, a potential disadvantage of multi-benefit projects is diverting focus from a singular benefit that may be a priority for a disadvantaged community. Nonetheless, when focusing on a singular benefit, multiple co-benefits may arise. The Greenlining Institute, which works toward racial equity in disadvantaged communities, states, "Because TCC focuses on multiple benefits at the neighborhood scale, the engagement process is more approachable, accessible, and efficient. Communities can plan for their neighborhood holistically, and the process invites people who may be experts on their neighborhood but not an expert on specific issue areas to participate."[32]

3.5. TRANSFORMATIVE PLANS

TCC's transformative plans consist of a community engagement plan, displacement avoidance plan, and workforce development and economic opportunity plan:

- A community engagement plan is created to involve local stakeholders in project development and implementation and to ensure that projects are designed to meet residents' needs.
- The displacement avoidance plan details the actions that will be taken to ensure that projects will not force households and businesses within the project area to move.
- The workforce development plan is used to ensure that the program will prepare residents for high-quality career pathways—particularly in careers in a future net-zero economy—and create high-quality local jobs.[33]

A key feature of transformative plans is uplifting community voices by having them lead the planning process. However, this requirement can be difficult for some communities that do not have the capacity to create multiple planning documents. TCC offsets this potential burden through planning grants that support communities in developing these plans.

A 2012 study by Schweizer, Davis, and Thompson uses attachment as a key aspect of their climate change engagement framework. They state, "we have focused on devising strategies to seek to understand the bonds and different forms of attachment

32 The Greenlining Institute, *Fighting Redlining and Climate Change with Transformative Climate Communities*, 24.

33 California Strategic Growth Council, "Transformative Climate Communities."

Residents give feedback at a neighborhood fair in TCC grantee community Ontario, CA. Jason Karpman, UCLA Luskin Center for Innovation

that people have for places, particularly landscapes impacted by climate change."[34] Making the connection between people's attachment to space and place is crucial for acknowledging the importance of a place-based approach for programs like TCC.

3.6. TECHNICAL ASSISTANCE AND CAPACITY BUILDING

TCC provides resources to support communities as they apply for grants, make plans, and implement projects through technical assistance and capacity building. In a 2022 study on transformative studies, Schreuder and Horlings explain technical assistance as the "technical dimension" to assisting the communities in becoming self-sufficient, allowing their technical innovations to be managed in a local or shared way. They describe capacity building as "supporting positive tipping points, which allow the fast deployment of evolutionary-like transformative solutions to tackle the present socio-climate quandary."[35]

The WHEJAC calls for capacity building to empower local organizations "to participate in local decision making and to hold government officials accountable."[36] A lack of these features can result in limited community knowledge of grant opportunities.

Technical assistance can help address a key inequity in competitive grant programs like TCC: all communities do not have the same resources and capacity to complete a grant application. In a 2008 study on social equity in grant programs, Collins and Gerber note that "social equity in grant programs is better served when grantors do not rely solely on

34 Schweizer, Davis, and Thompson, "Changing the Conversation about Climate Change."

35 Schreuder and Horlings, "Transforming Places Together."

36 White House Environmental Justice Advisory Council, "Justice40 Initiative Implementation."

competitive grant contracting in the selection and distribution of grant funds, which is typical in grant administration."[37] While TCC is a competitive grant program and may not be able to overcome this inequity entirely without restructuring, the program's technical assistance and planning grants may alleviate some of the inequity.

3.7. INTERAGENCY COORDINATION AND COLLABORATION

TCC's interagency coordination consists of significant collaboration at the state level which is helpful for maximizing benefits and coordinating activities to avoid redundancy or other negative outcomes. At the federal level, this kind of collaboration and coordination requires more effort and poses challenges that do not exist at the state level. This concern is due in part to the fact that most place-based programs are not housed across agencies and focus on only a single agency's goals.[38] Moreover, statutory, regulatory, and oversights of various agencies can further complicate work across agencies.[39]

Sometimes, agencies can have coordinators appointed to them by the president, sometimes they choose to establish interagency task forces, and sometimes they co-locate with one another.[40] Regardless of the mechanism, there are built-in challenges to coordinating two or more separate agendas into a single line of work or program. The Government Accountability Office's study on interagency coordination lists a number of practices that can be undertaken to ease higher-level collaboration among federal agencies, including defining a common goal; establishing compatible policies and procedures to operate across agencies; developing shared mechanisms for monitoring, evaluating, and reporting results; and reinforcing agency accountability.[41]

3.8. ONGOING PROGRAM EVALUATION

TCC grantees must allocate a portion of grant funds to an external evaluator who will measure the success of the program. Ongoing program evaluation ensures transparency and accountability throughout the project. According to a study conducted by Fu and Shipp, nonprofit leaders highlighted five themes that would support the successful and equitable implementation of Justice40, one of which is oversight accountability. They describe oversight accountability as, "a robust, transparent, and equitable accountability structure [that helps] ensure that Justice40 investments at all levels of government deliver the promised benefits to disadvantaged communities."[42] Based on their research with nonprofit leaders and federal government employees, Fu and Shipp recommend that federal agencies "create oversight and accountability mechanisms to ensure that [Justice40] guidance is followed and goals are met."[43]

37 Collins and Gerber, "Taken for Granted?"

38 Turner, Williams, and Pizarek, "Blueprint for the Next Generation of Place-Based Policy."

39 Turner, Williams, and Pizarek, "Blueprint for the Next Generation of Place-Based Policy."

40 Government Accountability Office, "Managing for Results."

41 Government Accountability Office, "Managing for Results."

42 Fu and Shipp, "Positioning Justice40 for Success."

43 Fu and Shipp, "Positioning Justice40 for Success."

4. METHODOLOGY TO COLLECT AND ANALYZE DATA ON FEDERAL EQUITY PRACTICES

Throughout this project, we gathered and analyzed multiple types of data to answer our research question. We conducted in-depth interviews with well-placed officials in the federal government to capture the nuance of how federal staff think about federal environmental justice work and the core features of TCC. We followed these interviews with a structured survey of interviewees and other federal employees to enable a systematic comparison of their thoughts about TCC features and assess their level of agreement with findings from the interviews. Lastly, we researched and collected documents published by federal agencies to further our knowledge of the operations of their current and past programs. Our goal was to gain a greater understanding of how federal agencies currently incorporate features of TCC, their willingness to adopt these features in the future, and their progress toward achieving Justice40 goals.

4.1. INTERVIEWING SGC AND FEDERAL EMPLOYEES

We interviewed two SGC staff members with the objectives of learning about SGC's past and current work on TCC, any barriers SGC faced while implementing TCC, and the extent of SGC's engagement with federal agencies. These interviews informed our federal interview guide (see Appendix E for the complete interview guide).

To understand the challenges, barriers, and opportunities federal agencies face in adopting TCC's features, we conducted interviews with staff from federal agencies currently covered by Justice40. We interviewed twenty-eight federal employees from thirteen agencies, one of whom submitted written responses rather than being interviewed verbally (see Appendix A for details). We selected interviewees based on several factors, including whether they work on Justice40-covered programs we deemed to be similar to TCC and if any contact information was available.

We interviewed informants from a range of authoritative levels within programs and federal agency departments. Some of our interviewees held roles with higher levels of authority; therefore, their views of the programs they oversee may not reflect the realities of the day-to-day operations or the details of administering the programs their department is working on. The views interviewees expressed do not necessarily represent their respective federal agencies. Table 2 summarizes the generalized job titles of the interviewees, with a count of each.

We used Atlas.ti, a software that facilitates the coding and analysis of qualitative data, to analyze the information from the interviews we conducted. We began by open coding the materials, identifying key themes within each interview that related to any features of TCC, among other information we thought could be useful in crafting recommendations. We grouped our findings based on overarching themes and then consolidated these findings, removing overlap and highlighting pertinent discoveries.

TABLE 2

Summary of Interviewees' Generalized Job Titles

Title	Count	Title	Count
Administrator	1	Fellow	1
Advisor	6	Lead	2
Analyst	2	Manager	2
Coordinator	2	Officer	1
Deputy Assistant Secretary	1	Special Assistant	1
Director	6	Specialist	2

4.2. SURVEYING FEDERAL EMPLOYEES

We conducted a survey to further assess the likelihood that federal agency employees would incorporate features of TCC into their existing programs and to ask lingering questions after our interviews (see the full survey in Appendix B). Primarily using a multiple-choice format, the survey asked participants to rank TCC features in order of likelihood of implementation and the degree to which participants agreed with our findings.

We distributed the survey to interviewees and other staff whom we did not interview, intending to get a broader sample of federal employees from Justice40-covered programs. We invited 167 federal staff members to take the survey, a list we developed based on several factors, including whether each person works on Justice40-covered programs we deemed to be similar to TCC and if any contact information was available. We received twenty-seven survey responses from participants spanning eleven agencies. While our survey response rate was low, it enabled us to gather more structured data and to fill information gaps from our interviews. The respondents are not a representative sample of all federal employees.

4.3. CREATING PROGRAM TIERS

A central goal of this analysis was to identify which existing Justice40-covered programs have the most potential to incorporate TCC features.

Data Collection and Coding: We began by collecting information on all Justice40-covered programs from each agency's website, tracking which programs appear to have some version of each TCC feature in a database. We coded this data by tagging each program with the TCC features listed in Table 3.

Grouping of Features: To prepare to put the programs into tiers based on features, we grouped the features into two categories, based on the system described in Table 3.

TABLE 3

TCC Features and Points for Initial Program Scoring

Feature	Rationale
Primary Features: • Place-based • Community-driven • Targeting disadvantaged communities	These features are the most foundational to TCC's program design. It may be more difficult to transition a program that is not place-based or community-driven toward a structure that incorporates those features. Starting with programs that already target disadvantaged communities may facilitate SGC's engagement.
Secondary Features: • Collaborative governance • Multi-benefit projects • Community engagement plans • Displacement avoidance plans • Workforce development plans • Technical assistance and capacity building • Interagency coordination and collaboration • Ongoing program evaluation	Each of these features may be easier to incorporate into a program than the features above. Having some combination of these features reveals potential for a program to strengthen those features and may indicate potential for others to be incorporated.

Developing Program Tiers: Based on the feature grouping in Table 3, we examined the programs and placed them into tiers, as described in Table 4. We limited the "Target Programs" tier to twenty programs and refined the list by moving highly specific and focused programs that did not fit well with SGC's topical areas down to the "Runner Up" tier. (For example, the DOI Cooperative Watershed Management Program has several TCC features, but its focus is specifically on local water management, which we considered far enough outside TCC's scope to exclude from the target tier.)

TABLE 4

Program Tier Descriptions and Criteria

Tier title	Description	Criteria
Target	The programs with the best potential for TCC feature incorporation and SGC engagement. We provide the most complete recommendations for engagement for these programs. We intentionally restricted the number of programs in this tier to ensure SGC can reasonably target all of these programs and to keep the scope of our analysis feasible.	These are programs with more than two primary features and/or more than six secondary features, or an equivalent combination. *For example, a program that is place-based and has collaborative governance, multi-benefit projects, and community engagement plans is applicable.*
Runner Up	These are programs that did not make the cut to be included in the target programs but SGC should explore in a later phase of engagement. We do not provide tailored recommendations for engaging these programs.	Programs with more than one primary feature and/or more than three secondary features, or an equivalent combination qualify. Also included are programs that fit the Target Programs criteria but were deemed too specific.
Some Potential	The programs that could possibly incorporate TCC features but do not currently incorporate many if any and that may not be a strong fit for engagement to qualify.	Programs with one primary feature or one to three secondary features, or an equivalent combination qualify.
Low Potential	The programs with very little overlap with TCC and, in many cases, that focus on topics far removed from TCC focus areas.	Programs with no primary features and one or zero secondary features qualify.

4.4. SELECTING FEDERAL AGENCIES TO RECOMMEND

To supplement the program tier analysis, we conducted a document analysis of other materials published by each agency. This included the agency's strategic plan (if available), press releases related to Justice40, and other materials relating to environmental justice or equity. Through this analysis, we explored how agencies view topics relevant to TCC features and SGC's work.

Based on this analysis and our interviews, we selected five target agencies with the most potential for shared learning with SGC. We cross-checked these agencies against the Justice40-covered programs identified as "Target Programs" (as described in the next section) and found there was significant overlap. As a result, the five agencies include agencies with more than one target program, as well as agencies with one target program that showed significant potential based on our other analysis. A more in-depth analysis of opportunities at these five agencies is included in section 5.2, and an analysis of the other agencies is included in Appendix D.

5. FINDINGS AND RECOMMENDATIONS FOR TARGET PROGRAMS AND AGENCIES

5.I. PROGRAMS

Below, we present a brief synopsis of each target program as well as our recommendations for how SGC should begin to engage each program. For a complete list of programs in the target, runner-up, and potential tiers, see Appendix C.

APPALACHIAN REGIONAL COMMISSION GRANTS (ARC)

The Appalachian Regional Commission (ARC) Grants use congressional funds to directly invest in community development and economic prosperity in the Appalachian region.[44] Additionally, ARC issues Requests for Proposals supporting research and evaluation to assist economic development.[45] The federal co-chair requested $235 million to fund projects for fiscal year 2023.[46] These grants are tied to ARC funding and are therefore highly likely to continue for the foreseeable future.

Features

Multi-benefit projects: While ARC's main purpose is supporting the economic stability and revitalization of the Appalachian region, programs funded by ARC grants target multiple issue areas.[47] The ARC investment strategy highlights five goals: building businesses, strengthening the workforce, supporting community infrastructure, expanding regional tourism, and supporting community leadership.[48] ARC defines a good project as being "strategic, collaborative, impactful, and sustainable."[49] One interviewee mentioned that ARC prefers to see strategic plans that demonstrate a community is engaged in a project to ensure that new projects build on previous work.

Targeting disadvantaged communities: One interviewee noted that ARC allocates funds in different ways, including a formula that measures socioeconomic indicators and determines where funding is needed. States then take funds to submit projects to ARC for approval. Some grants are tailored to specific activities and allow applicants in a region to compete for funding. When communities apply for grants, they are assigned a grant officer, who assists applicants with the process, creating localized support within disadvantaged communities, according to an interviewee.

44 Appalachian Regional Commission, "Grants & Opportunities for Appalachia."
45 Appalachian Regional Commission, "FY 2023 Performance Budget Justification."
46 Appalachian Regional Commission, "FY 2023 Performance Budget Justification."
47 Appalachian Regional Commission, "Appalachia Envisioned."
48 Appalachian Regional Commission. "ARC's Investment Priorities for Appalachia."
49 Appalachian Regional Commission. "About ARC Grants."

Potential Strategies for Engagement

This region-specific grant initiative mirrors the place-based approach of TCC, providing a strong peer-to-peer learning opportunity for SGC. ARC has a history of aligning its programs with community needs.[50] One ARC interviewee stated that Justice40 matches the ARC mission because many populations ARC assists are in poverty. SGC can discuss ways to facilitate communities' grant application processes, as one interviewee noted that the many statutory directives from each federal agency's grant applications vary. One staff employee noted that precisely defining transformative plans is a challenge for ARC and a potential point of learning from SGC. ARC might benefit from guidance on long-term program evaluation, which is difficult to conduct in smaller communities, according to one interviewee.

BUILDING RESILIENT INFRASTRUCTURE AND COMMUNITIES PROGRAM (FEMA)

The Building Resilient Infrastructure and Communities (BRIC) Program focuses on reducing disaster and natural hazard risks in local communities, states, tribes, and territories by providing support during their hazard mitigation project planning. To create climate-resilient communities, BRIC helps these communities build capacity, innovate, and create strategic partnerships.[51] The 2022 fiscal year grant application period was from September 30, 2022 to January 27, 2023.[52] Though the website does not discuss funding beyond fiscal year 2022, the program has been operating since 2018 and can be expected to continue.[53]

Features

Targeting disadvantaged communities/community-driven: One interviewee noted that BRIC intends to "give full support to communities that may not have the resources to begin climate resilience planning and project solution design on their own. Through hands-on support, this program works to enhance a community's capacity to design holistic, equitable climate adaptation solutions."

Multi-benefit: When applying for support through BRIC, communities are required to create a cost-benefit analysis of their project to prove cost-effectiveness via FEMA's benefit-cost analysis tool.

Technical assistance and capacity building: FEMA is working to enhance their non-financial direct technical assistance to mitigate potential challenges in applying for BRIC and having the capacity to design and implement their project.[54]

50 Appalachian Regional Commission, "Appalachia Envisioned."

51 Federal Emergency Management Agency, "Building Resilient Infrastructure and Communities."

52 Federal Emergency Management Agency, "Building Resilient Infrastructure and Communities."

53 Federal Emergency Management Agency, "When You Apply for Building Resilient Infrastructure and Communities (BRIC) Funds."

54 Federal Emergency Management Agency, "Building Resilient Infrastructure and Communities."

Collaborative governance: BRIC incorporates a twenty-five percent non-federal cost share which requires collaboration with multiple levels of government and community.[55] However, according to one interviewee, stakeholders have found this feature of the program to be an obstacle for many communities.

Potential Strategies for Engagement

One interviewee said they are focusing on building out the technical assistance portion of BRIC since it currently does not directly "put money in the communities hands," but rather allocates the funds to contractors and staff to provide services to the community. The interviewee noted that to serve the most disadvantaged and underserved communities, the program needs to continue to enhance its non-financial direct technical assistance. This presents an opportunity for SGC to provide guidance to FEMA on how to expand technical assistance and capacity building in a way that suits the program and employees and ensures that the most disadvantaged communities are being considered.

CHOICE NEIGHBORHOODS (HUD)

Choice Neighborhoods, a competitive housing grant program, provides grants for communities implementing plans to revitalize public housing or assisted housing and the surrounding neighborhood. This program leverages public and private funding to address the needs of neighborhoods with distressed public or HUD-assisted housing through community-driven strategies.[56] Choice Neighborhoods is implemented via planning that incorporates input from local leaders, residents, and stakeholders.. Launched in 2010, Choice Neighborhoods has awarded funding every year since.[57] For fiscal year 2022, this program received $350 million in appropriations.[58] While the program website does not discuss funding beyond fiscal year 2023's Notice of Funding Opportunities, there is no reason to believe this program will end imminently.[59]

Features

Place-based: This program requires applicants to define a geography that defines a "neighborhood." All work related to their grant happens within that defined area.

Community-driven: Community input is a central component of this program, according to one interviewee, with HUD having a statutory requirement for resident engagement in the grantee neighborhoods and having an educational component that involves local school districts in project areas. Cities act as neighborhood leads by engaging community development groups and residents.

55 Federal Emergency Management Agency, "Building Resilient Infrastructure and Communities."

56 Department of Housing and Urban Development, "Choice Neighborhoods."

57 National League of Cities, "Choice Neighborhoods: HUD Grants for People & Places."

58 Department of Housing and Urban Development, "FY2022 Notice of Funding Opportunity."

59 Department of Housing and Urban Development, "FY2023 Notice of Funding Opportunity."

Groundbreaking for a Choice Neighborhoods community in Kansas City, Missouri. HUD

Technical assistance: Choice Neighborhoods offers technical assistance to grantees through short-term advice and expertise on a particular challenge or emerging opportunity related to innovative approaches for their project.[60]

Transformative plans: According to one interviewee, planning grants meant for transformative planning in this program generally cost $500,000 over a two-year planning process. The transformation plans that all grantees must submit have a community engagement element and workforce development planning, which form part of Choice Neighborhoods' "people" goals for projects. This program also has a replacement requirement where anything removed must be replaced (e.g., rebuilding a public housing unit for every one taken away).

Potential Strategies for Engagement

Not only does Choice Neighborhoods incorporate many of the same features as TCC, but it is also highly aligned with the Justice40 mission, according to an interviewee. One way in which SGC could engage HUD on this program is to help them with their strategic alignment and collective engagement. There is an opportunity to help HUD integrate some form of displacement avoidance and share lessons learned on providing technical assistance from the inception of a project through implementation, especially in the planning phase.

60 Department of Housing and Urban Development, "Choice Neighborhoods Technical Consulting."

COMMUNITIES LOCAL ENERGY ACTION PROGRAM (DOE)

The Communities Local Energy Action Program (Communities LEAP) is a place-based pilot initiative that provides technical assistance to support "community-driven clean energy transitions."[61] The program aims to help communities access clean energy benefits. For the pilot, which began in March 2022 and is ongoing, the program is providing technical assistance worth $16 million to support twenty-four communities in identifying clean energy objectives and creating plans to achieve them. Through technical assistance, the program uses a relatively small amount of funds (as noted by one interviewee) to prepare communities to "[identify] specific resource opportunities to take those further steps."[62] While it is not clear whether the program will continue beyond the pilot, "it has convinced DOE to double down on [its] place-based, community-centered work."[63] An interviewee noted that "[they] hope that the LEAP pilot is able to continue on, although it is not yet clear what the next steps may be."

Features

Community-driven: Two DOE interviewees pointed to this program as a model for advancing communities' visions for the clean energy transition.

Technical assistance and capacity building: One interviewee said that Communities LEAP represents a new program model for DOE and originated partially from the department's desire to increase technical assistance and capacity building for communities, diverging from more technological, industry-focused technical assistance.

Collaborative governance: Applicants to the program must be "multi-stakeholder teams," led by a single lead organization, composed of at least one community-based organization and at least one government body (and, optionally, a number of other types of organizations). The team as a whole must be capable of effectively using the provided technical assistance in a way that furthers community-set goals.

Potential Strategies for Engagement

This program has a place-based, community-driven structure and technical assistance at its core. It has one of the most similar collaborative governance structures to TCC's that we identified among federal programs. The best practices developed through SGC's community-focused technical assistance and collaborative governance structure could help DOE turn this pilot initiative into a fully-fledged, long-term program. Should staff wish to obtain congressional appropriations for the program (an interviewee noted that the first iteration was funded through contributions from various DOE office's existing budgets), SGC's expertise could be a useful resource. To learn more about the program and start to engage staff, SGC could consider reaching out to contacts in Stockton, CA, which is both a TCC grantee and a Communities LEAP participant.[64]

61 Department of Energy, "Communities LEAP."

62 Department of Energy, "Communities LEAP (Local Energy Action Program) Pilot."

63 Department of Energy, "One Year of Communities LEAP."

64 Department of Energy, "One Year of Communities LEAP."

COMMUNITY DEVELOPMENT BLOCK GRANTS (HUD)

The Community Development Block Grant (CDBG) program provides formula grants to states, cities, and counties each year.[65] These grants are given for the purpose of developing "viable urban communities" by providing housing and suitable living environments as well as the expansion of economic activities for low- and moderate-income populations.[66] The grants under this program allow people and communities to help design and implement strategies based on their needs and priorities.[67] Eligible grantees include cities, counties, and states. The funding can be used for infrastructure, economic development, public facilities, housing, public services, homeowner assistance, and other activities.[68] This program has been in existence since 1974, setting a precedent for it to continue to receive funding. In fiscal year 2022, the budget for CDBG grants was $3,330,000.[69]

Features

Transformative plans: HUD's version of a transformative plan is a Consolidated Plan, which is heavily tied to housing. This plan requires grantees to advance fair housing; they must complete an Analysis of Impediments to Fair Housing Choice and implement measures to address issues that the analysis identifies.[70] One interviewee said that consistency with the Consolidated Plan is a threshold requirement for communities to meet.

Community-driven: This program requires grantees to develop and follow detailed plans to encourage citizen participation, especially by those residents of low- and moderate-income neighborhoods or areas. The program must provide access to information related to the grantee's usage of funds as well as access to public hearings where they can voice their views and ask questions at all stages of the development process.[71]

Potential Strategies for Engagement

One area of overlap that could be strengthened is in the grantee planning stage. SGC could provide knowledge to HUD on creating more specific workforce development, community engagement, and displacement avoidance plans. While this program has a narrower focus than TCC on furthering fair housing, its wide array of potential project areas would make it a good fit for learning from TCC.

65 Department of Housing and Urban Development, "Community Development Block Grant Program."

66 Department of Housing and Urban Development, "Community Development Block Grant Program."

67 Department of Housing and Urban Development, "Community Development Block Grant Program."

68 Department of Housing and Urban Development, "CDBG: Community Development Block Grant Programs."

69 Department of Housing and Urban Development, "CPD Appropriations Budget/Allocations."

70 Department of Housing and Urban Development, "Consolidated Plan Process, Grant Programs, and Related HUD Programs."

71 Department of Housing and Urban Development, "Community Development Block Grant Program."

COMMUNITY ECONOMIC DEVELOPMENT (HHS)

The Community Economic Development (CED) program awards grants to organizations that work on community development. Through these grants, organizations work to enhance and expand business and job opportunities for low-income individuals experiencing poverty and high unemployment rates. Community members who receive jobs through this program are connected to support services that can remove barriers to economic mobility and long-term employment. CED funds provide paid leave, benefits, career growth, and living wages through the jobs that are created for low-income community members.[72] CED was authorized in 1981 and currently receives around $30 million annually to administer grants.[73]

Features

Collaborative governance: Community development corporations that received grant funding, "must be governed by a three-party board of directors that includes residents of the community served, and local business and civic leaders."[74]

Community-driven: While the grant funding is not going directly to the community, limiting this program's ability to be community-driven, the collaborative feature allows for community members to be engaged in the decision-making process. However, the flexibility of CED's projects allows for the targeted disadvantaged communities to choose the workforce development that is right for them.[75]

Potential Strategies for Engagement

This program creates opportunities for flexibility in grant spending to ensure job opportunities are created, community assets are built, and profits and reinvestments remain in the community. Some form of ongoing program evaluation may be necessary to ensure that these assets are staying in the community and leading to long-term employment. SGC may consider working with the HHS to ensure that this program is achieving its goals of providing economic self-sufficiency to low-income families and individuals in disadvantaged communities.

72 Administration for Children and Families, "Community Economic Development (CED)."

73 Department of Health and Human Services, "Fiscal Year 2011 Report to Congress."

74 Administration for Children and Families, "About the Community Economic Development (CED) Program."

75 Administration for Children and Families, "Community Economic Development (CED)."

INDIAN COMMUNITY DEVELOPMENT BLOCK GRANTS (ICDBG)

This competitive grant program is geared toward indigenous communities with established relationships with the federal government.[76] The program provides funding for housing, community facilities, and economic development. The program includes up to $4 million in noncompetitive grants to address problems that put tribal residents at risk.[77] For fiscal year 2023, the ICDBG program received $75 million in appropriations. This program was established in 1974, setting a precedent for it to continue to receive funding.[78]

Features

Place-based: ICDBGs are one of multiple programs under the Department of Housing and Urban Development that prioritize place-based funding to specifically delineated regions. In this case, the "place" is tied to wherever Indian and Alaska Native communities are located.

Targeting disadvantaged communities: This program is specifically geared toward disadvantaged Indian and Alaska Native communities whose housing conditions were found to be substantially worse than that of other US households in HUD's study on Housing Needs of Indians and Alaska Natives.[79]

Potential Strategies for Engagement

The place-based and targeted approach to addressing high-needs communities of this program is similar to that of TCC and presents an opportunity for SGC to share its best practices for community engagement. While the grants themselves can be applied to multiple types of community development initiatives, the nature of this funding opportunity makes it harder for agency staff to directly identify multiple benefits being created in these projects because the multiple benefits of housing are less tangible and more difficult to enumerate. SGC's guidance on ways to promote the inclusion of multi-benefit aims in projects would help HUD make those benefits clearer.

76 Department of Housing and Urban Development, "Indian Community Development Block Grant Program (ICDBG)."

77 Department of Housing and Urban Development, "Indian Community Development Block Grant Program (ICDBG)."

78 Congressional Research Service, "The Indian Community Development Block Grant (ICDBG) Program."

79 Department of Housing and Urban Development, "HUD Announces $147 Million to Tribal Communities."

LAND AND WATER CONSERVATION FUND (DOI)

The Land and Water Conservation Fund (LWCF) provides funding for land acquisition and interest in order to benefit public lands and waters. The funds are used to support conservation, recreation, and other related efforts that enhance public access to water, land, and resources. Supporting public management of these resources is a key outcome of the program.[80] LCWF was created in 1965. After it received permanent authorization in 2019, Congress funded the program with $900 million annually.[81]

Features

Community-driven: Through the LWCF program, one interviewee notes that communities have a lot of input into which lands DOI's Bureau of Land Management acquires based on how this will positively impact their community and create neighborhood-scale projects.

Targeting disadvantaged communities: Communities experiencing a greater amount of environmental hazards may rank higher in the funding process to encourage community-led projects from disadvantaged communities.

Multi-benefit: One interviewee suggested that LWCF projects are inherently multi-benefit because they result in a variety of outcomes that benefit the specific communities. For instance, enhancing access to trails and outdoor recreation may improve public health and air quality through improvements made to open space accessibility.

Collaborative governance: LWCF utilizes aspects of collaborative governance through funds received by Congress to the Bureau of Land Management, the US Fish and Wildlife Service, the National Park Service, the US Forest Service, and State and local governments. These entities must work together as well as with communities to ensure project outcomes and funding requirements are met.

Potential Strategies for Engagement

A possible method for initial engagement with LWCF is through the community-driven aspects of this program by ensuring that community members are leading projects in their neighborhoods. SGC may also find areas of the program that could be developed surrounding technical assistance and capacity building for communities that would like to apply for their lands to be acquired by the Bureau of Land Management or another entity.

80 Bureau of Land Management, "Programs: Land and Water Conservation Fund."

81 Bureau of Land Management, "Programs: Land and Water Conservation Fund."

OFFICE OF COMMUNITY REVITALIZATION (EPA)

The Office of Community Revitalization (OCR) "supports locally-led, community-driven efforts to revitalize local economies and improve environmental and human health outcomes."[82] OCR creates tools for communities and publishes research and case studies on a variety of topics. Additionally, they share examples of strategies and projects that other communities can learn from or replicate, and they help lead the EPA's Environmental Justice and Community Revitalization Council. This program will run at least until fiscal year 2026.[83]

Features

Interagency collaboration: OCR collaborates with "other EPA programs, federal agencies, regional, state, and local governments, and [a range] of nongovernmental and private-sector partners to bring additional resources to communities and to leverage public and private sector investments."[84]

Technical assistance and capacity building: Technical assistance is provided in response to requests from communities for issues such as "diversifying economies and revitalizing main streets through local and regional food systems, broadband infrastructure investments, health care organizations and other community assets."[85] However, an interviewee from HUD suggested that technical assistance can be improved by effectively anticipating community needs rather than waiting for a request for help because "sometimes people don't like to ask for help."

Potential Strategies for Engagement

There is an opportunity for SGC to help the EPA improve its technical assistance structure so it better addresses community needs and does not rely on communities to reach out for assistance. Additionally, SGC may consider engaging in shared learning with EPA in regard to methods of program evaluation.

ENVIRONMENTAL AND CLIMATE JUSTICE BLOCK GRANT PROGRAM (EPA)

The Environmental and Climate Justice (ECJ) Block Grant Program will provide grants to further community efforts to tackle persistent pollution in underserved communities that have been historically overburdened by pollution and "worse health and economic outcomes." The EPA claims that this program will "aggressively advance environmental justice and support projects like community-led air pollution monitoring, prevention and remediation; mitigating climate and health risks from extreme heat and wildfires; climate

82 Environmental Protection Agency, "About the Office of Policy (OP)."
83 Environmental Protection Agency, "About the Office of Policy (OP)."
84 Environmental Protection Agency, "About the Office of Policy (OP)."
85 Environmental Protection Agency, "About the Office of Policy (OP)."

Community members in Haines, Alaska, collaborate with the EPA Office of Community Revitalization on outdoor recreation. EPA OCR

resilience and adaptation; and reducing indoor air pollution."[86] The program will distribute $3 billion from the Inflation Reduction Act over fiscal years 2022 to 2026.

From February to April of 2023, the EPA requested public input on "new and innovative strategies and approaches for competition design, community engagement, equitable distribution of financial resources, grantee eligibility for funding, capacity-building and outreach, and technical assistance."[87] Evergreen Action, a policy advocacy group, proposed that the Transformative Climate Communities (TCC) program be used as a model for this program as it is a successful example of a state-level initiative that helps to build community capacity.[88]

Potential Strategies for Engagement

The program is currently in its infancy, thus there is an opportunity for SGC to communicate its best practices and lessons learned in terms of technical assistance, reporting, and barriers to application, as these are specific areas in which the program is looking for guidance. Because this program is new, there is an opportunity for SGC to help guide and inform the EPA on strategies for program evaluation.

86 Environmental Protection Agency, "Advancing Environmental Justice."

87 Environmental Protection Agency, "Inflation Reduction Act Environmental and Climate Justice Program."

88 Evergreen Action, "Evergreen Explains."

REBUILDING AMERICA'S INFRASTRUCTURE WITH SUSTAINABILITY AND EQUITY (DOT)

The Rebuilding America's Infrastructure with Sustainability and Equity (RAISE) discretionary grant program provides funding directly to public agencies to invest in infrastructure projects for passenger and freight vehicles.[89] The criteria for evaluating projects include safety, sustainability, impact on quality of life, partnership and collaboration, community mobility, and other equity-based objectives.[90] The projects funded by RAISE grants aim to improve travel accessibility, advance racial equity, and further economic growth. The program aims to help communities with projects that will introduce significant local and regional impacts.[91]

The RAISE grant program is an existing program that was revitalized with BIL funds; in its previous iterations, it was known as the Transportation Investment Generating Economic Recovery (TIGER) and Better Utilizing Investments to Leverage Development (BUILD) Discretionary Grants programs. In 2022, the Biden administration announced $7.5 billion from BIL to support RAISE grants over five years.[92]

Features

Targeting disadvantaged communities: Half of RAISE grant funds are provided to rural areas, and the other half of the funds flow to urban areas; close to two-thirds of RAISE grant-funded projects are located in disadvantaged communities.[93] Applicants to the RAISE grants are encouraged to consider how projects will "address climate change, ensure racial equity, and remove barriers to opportunity."[94]

Multi-benefit: While RAISE grants center on transportation infrastructure revitalization, the benefits of RAISE-funded projects span multiple sectors, including economic development, racial equity, environmental sustainability, and increased connectivity.[95] Several projects have built-in workforce development plans, including apprenticeship programs and project labor agreements.

Potential Strategies for Engagement

While RAISE focuses its benefits on transportation connectivity and economic/workforce development, SGC can engage with DOT to develop additional benefits resulting from the investment from these grants.[96]

89 Department of Transportation, "About RAISE Grants."
90 Department of Transportation, "Biden-Harris Administration Announces Funding for 166 Projects."
91 Department of Transportation, "Raise Discretionary Grants."
92 Department of Transportation, "Biden-Harris Administration Announces Funding for 166 Projects."
93 Department of Transportation, "Biden-Harris Administration Announces Funding for 166 Projects."
94 Department of Transportation, "Raise Discretionary Grants."
95 Department of Transportation, "Raise Discretionary Grants."
96 Department of Transportation, "Biden-Harris Administration Announces Funding for 166 Projects."

THRIVING COMMUNITIES PROGRAM (DOT)

The Thriving Communities Program (TCP) helps bolster the technical tools and organizational capacity of disadvantaged communities (DACs) that face disproportionate environmental, health, and climate burdens.[97] The DOT Thriving Communities program stems from the larger Federal Thriving Communities Initiative, which is a result of federal agency collaboration aimed at helping communities thrive with the help of federal resources.[98] In selecting community partners, DOT prioritizes applicants with "past success in applying for or receiving Federal transportation funding" or success implementing infrastructure programs.[99] In April 2023, $21.15 million was awarded to four capacity builders in TCP, allocating funds to assist sixty-four communities.[100]

Features

Targeting disadvantaged communities: The Thriving Communities Program channels its resources to assist disadvantaged communities. Eligible applicants are described as teams of community partners interested in receiving technical assistance, planning, and capacity-building support to achieve federal aid and complete community-based projects that help regions thrive.[101]

Collaborative governance: Government applicants must partner with a minimum of two other community organizations to ensure that disadvantaged communities are represented in the project; these partners support local capacity or help with project implementation. [102] One DOT interviewee stated that TCP presents an opportunity for DOT to learn from programs in California and around the country to help center place-based elements in the program.

Multi-benefit: Like TCC, the projects covered by TCP address several issues of community revitalization, including improving housing, minimizing transportation cost burdens, connecting people to health care, increasing food access, and supporting education.[103]

Technical assistance: The Thriving Communities Program provides technical assistance to teams of community partners that lack staff capacity or technical expertise to develop infrastructure projects in their communities.[104] TCP provides two years of comprehensive assistance to communities, helping them develop transportation, housing, and community revitalization activities.[105]

97 Department of Transportation, "Thriving Communities Program."
98 Department of Transportation, "Thriving Communities Program."
99 Department of Transportation, "Information for Communities."
100 Department of Transportation, "Thriving Communities Program."
101 Department of Transportation, "Thriving Communities Program."
102 Department of Transportation, "Information for Communities."
103 Department of Transportation, "Thriving Communities Program."
104 Department of Transportation, "Information for Communities."
105 Department of Transportation, "Information for Communities."

A Bay Area Rapid Transit train.
Eric Fischer

Potential Strategies for Engagement

In many interviews with federal employees, staff mentioned difficulty collaborating across federal agencies and engaging in direct community outreach. The Thriving Communities Network of the federal government provides an entry point for SGC to learn from and assist federal agency collaboration. The Thriving Communities Network helps Cabinet agencies coordinate efforts to provide technical assistance and capacity building to communities in economic distress that have faced disinvestment.[106] Furthermore, as a program, TCP creates a partnership with communities that mirrors SGC's relationship with TCC partner communities, providing an opportunity for peer-to-peer learning on effective community engagement and technical assistance. TCP represents DOT's concept of transformation, which the department defines as advancing strategic priorities and equity.

106 Department of Transportation, "Federal Interagency Thriving Communities Network."

TRANSIT-ORIENTED DEVELOPMENT PLANNING PROGRAM

The Transit-Oriented Development Planning Program is a pilot initiative that provides planning grants to support comprehensive land use and transportation planning in grantee communities. Grants must go to state or local government entities that already receive Federal Transit Administration funding, and each grant is associated with an ongoing transit infrastructure project. The outcome of each grant will vary but might include strategic plans, policies, zoning changes, and other actions that encourage or enable transit-oriented development in the community. The program, which began in 2022, will disburse up to $14 million per year through 2026.[107]

Features

Multi-benefit: In addition to core program characteristics, the program considers a wide variety of types of benefits when selecting grantees, including whether proposals reduce greenhouse gas emissions and if they address environmental justice issues.[108] Projects that "help reduce transportation costs, combat pollution and climate change, and promote housing affordability" are prioritized for funding.[109]

Community engagement: Applications are also evaluated based on their partnerships within their communities and engagement with "those traditionally underserved by existing transportation systems." The program also prioritizes proposals that enable communities with environmental justice issues to participate in the planning process.[110]

Potential Strategies for Engagement

This program encourages applicants to build strong partnerships and conduct robust community engagement through application review criteria. There may be potential in future iterations of the program guidelines to incorporate a more formal collaborative governance structure, such as requiring applicants to establish formal partnerships with community-based organizations as part of the grant application process. SGC could encourage and facilitate this change. Additionally, SGC could work with program staff to evaluate and expand on how multi-benefit projects are prioritized as well as which benefits are considered.

107 Department of Transportation, "FY 2022 Competitive Funding Opportunity."

108 Department of Transportation, "FY 2022 Competitive Funding Opportunity."

109 Department of Transportation, "US Department of Transportation Announces Initial $13 Million Funding Opportunity."

110 Department of Transportation, "FY 2022 Competitive Funding Opportunity."

YouthBuild participants work on a construction project with the Hmong American Farmers Association. Media Mike Hazard

YOUTHBUILD PROGRAM

Founded in 1990, YouthBuild is an annual grant competition that funds local organizations to create job training and educational programs for individuals ages sixteen to twenty-four who have not completed high school. Beyond basic requirements (such as providing construction training, leadership development, and education), grantees can tailor each local program to the community it serves. In addition to skill attainment, participants provide community service by constructing or rehabilitating affordable housing. The program is not environmental in nature; however, interviewees noted that it is well aligned with Justice40 goals due to its targeting of low-income, low-employment communities and its flexibility for incorporating environmental goals.[111] YouthBuild receives an annual appropriation from Congress. In 2023, the program received $90 million. Based on interviews, the program is stable and is not expected to lose significant funding in future years.

111 YouthBuild, "Home Page" and "YouthBuild Program Manual." Hunt and Peña, "YouthBuild."

Features

Multi-benefit: While construction is still a primary focus of YouthBuild's training, grantees have increasing flexibility to train participants in other skills. An interviewee noted that, although the statute governing YouthBuild does not mention climate change or the environment, the department has offered bonus points to applicants who will provide training related to clean energy, green building techniques, and other environmental job skills.

Collaborative governance: With a requirement that grantees partner with a local one-stop job center to maximize resource and knowledge sharing, YouthBuild has some degree of a collaborative governance structure.[112] There may be potential to further develop this by encouraging or requiring grantees to partner with other local organizations.

Technical assistance and capacity building: DOL provides technical assistance to grantees to support training program development. One interviewee mentioned that the department is shifting toward a more tailored approach to technical assistance. DOL also encourages grantees offering similar types of training programs to learn from one another, according to an interviewee. On the capacity building front, interviewees noted that the program provides strong leadership development for youth and the services of each program are highly tailored to each community's needs.

Interagency collaboration: Interviewees noted that they regularly work with other federal agencies, including HUD, DOE, and more.

Ongoing program evaluation: A 2018 program evaluation continues to inform how YouthBuild staff design program features, according to an interviewee.

Potential Strategies for Engagement

While in many ways YouthBuild is very different from TCC, there are opportunities for shared learning between SGC and YouthBuild. YouthBuild could expand the required partnerships into a more developed collaborative governance structure through the prioritization of applications which demonstrate that an applicant has partnered with multiple local organizations to understand community needs. SGC could also help YouthBuild identify ways of expanding the multi-benefit nature of the program.

112 Grants Office LLC, "YouthBuild Grants."

5.2. AGENCIES

In this section, we present findings and recommendations for the five agencies with the most potential for shared learning with SGC and for incorporating TCC features. This section is intended to supplement our program tiers, focusing on the most high-opportunity agencies. For each of these top five agencies, we list key offices for SGC to engage, note the three highest ranking programs (labeling target programs with a), and describe overarching themes from our document analysis and interviews that can inform SGC's engagement. For a brief summary of our findings for each of the other agencies with Justice40-covered programs, please refer to Appendix D.

DEPARTMENT OF HEALTH AND HUMAN SERVICES (HHS)

Key Offices

- Office of Environmental Justice
- Office of Climate Change and Health Equity
- Office of Community Services

Highlighted Programs

- Community Economic Development
- Community Services Block Grant
- Rural Community Economic Development Program

Themes

Overall Justice40 plan: The central themes of HHS's Justice40 efforts are reducing pollution and helping communities navigate climate-related events with public health consequences.[113] HHS partnered with the White House in April 2022 to release the Health Sector Climate Pledge encouraging healthcare stakeholders to cut emissions.[114]

Community-driven: HHS's Justice40 programs are people-based and span worker training to utility payment assistance.[115] One HHS interviewee emphasized the need for the department to listen to communities' specific needs and increase the accessibility and usefulness of HHS resources. This interviewee noted that in addition to being aware

113 Department of Health and Human Services, "HHS Announces Programs to Join President Biden's Justice40 Initiative."

114 Department of Health and Human Services, "HHS Launches Pledge Initiative to Mobilize Health Care Sector to Reduce Emissions."

115 Department of Health and Human Services, "HHS Announces Programs to Join President Biden's Justice40 Initiative."

of community needs, HHS needs to understand community assets and build upon existing successes.

Multi-benefit projects: While HHS maintains a strong focus on public health and emissions reductions, its strategic goals cover the topics of healthcare, social well-being, and solidifying trust in science.[116] One HHS interviewee noted that even if a project is focused on a specific area, like transportation or housing, the overall HHS goal is to determine how a community or a member of a community can be healthy and thrive in their environment. SGC could encourage HHS to prioritize projects that explicitly aim to have multiple benefits by illustrating how this strategy can help achieve strategic goals.

Interagency collaboration: HHS outlines the need for a collaborative approach to addressing climate change.[117] One HHS interviewee mentioned that the interagency working group for environmental justice has assisted with interagency collaboration in achieving Justice40 goals. Another HHS employee stated the need to ensure that HHS programs are aligned with other agencies' Justice40 efforts.

Ongoing program evaluation: The department also has strong evaluation measures for their 2022–2026 Strategic Plan goals, making HHS a good partner for SGC to engage with for peer-to-peer learning. HHS includes performance goals for each strategic objective presented, evaluating the overarching themes as well as specific impacts that support long-term objectives.[118]

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

Key Offices

- Office of Economic Development
- Office of Community Planning and Development
- Office of Public and Indian Housing

Highlighted Programs

- Choice Neighborhoods
- Community Development Block Grant
- Indian Community Development Block Grants

Themes

116 Department of Health and Human Services, "Overview: HHS Strategic Plan FY 2022–2026."

117 Department of Health and Human Services, "HHS Announces Programs to Join President Biden's Justice40 Initiative."

118 Department of Health and Human Services, "Overview: HHS Strategic Plan FY 2022–2026."

Overall Justice40 plan: Transformative housing and community-building policies foreground HUD's goals of achieving equitable housing strategies.[119] HUD outlines a central focus of people's lived experiences and community-based needs.[120] The department also outlines five strategic goals; the goals most relevant to SGC's values are supporting disadvantaged communities, increasing accessibility of affordable housing, advancing sustainability, and strengthening internal capacity by bolstering HUD grants management.[121]

Place-based: One HUD interviewee described many HUD programs as place-based, stating that once a grant applicant defines a geographical location for their scope of work, that neighborhood receives almost all grant benefits.

Multi-benefit projects: The HUD Office of Economic Development defines six livability principles that align with SGC's priorities, integrating the need for more transportation options in communities and accessible housing options.[122] Similarly to HHS, SGC could engage HUD to encourage more explicit prioritization of multi-benefit projects across programs, noting that this strategy can help achieve these principles and the department's strategic goals.

Community engagement: Two priorities of HUD's strategic plan are supporting customer service and increasing equity. One HUD interviewee pointed to the HUD Continuum of Care Program, which promotes community collaboration to end homelessness. While this program is not covered by Justice40, and therefore was not included in our program analysis, it would be a good program for SGC to consider engaging.

Interagency collaboration: The livability principles emphasize the need for greater alignment among federal agencies to remove collaboration barriers and better leverage funding, providing a path for interagency cooperation.[123]

Community-driven and collaborative governance: HUD's livability principles also assert the need to support existing communities and incorporate communities' unique values, demonstrating a community-based approach. Furthermore, an interviewee noted that projects require resident involvement. HUD works with an array of nonprofit organizations to provide case management or service coordination to improve outcomes. An interviewee also noted two challenges with collaborative governance: the difficulties of working with a large group with varying priorities and interests and bringing together a variety of funding sources.

DEPARTMENT OF ENERGY

119 Department of Housing and Urban Development, "HUD Announces 24 Programs to Join Biden-Harris Administration Justice40 Initiative."

120 Department of Housing and Urban Development, "FY 2022–2026 HUD Strategic Plan."

121 Department of Housing and Urban Development, "FY 2022–2026 HUD Strategic Plan."

122 Department of Housing and Urban Development. "Six Livability Principles."

123 Department of Housing and Urban Development. "Six Livability Principles."

Key Offices

- Office of Economic Impact and Diversity
- Office of Energy Efficiency and Renewable Energy

Highlighted Programs

- Communities Local Energy Action Plan
- Energy Improvement in Rural and Remote Areas
- Energy Efficiency and Conservation Block Grant Program

Themes

Overall Justice40 plan: DOE Justice40 goals include reducing the energy burden in disadvantaged communities, advancing clean energy equity, and providing more clean energy jobs in disadvantaged communities.[124] One DOE interviewee stated that since the Fall of 2021, equity has been prioritized in renewable energy and clean energy technology work at DOE.

Community engagement and transformative plans: Community benefits plans, which are required from DOE grant applicants and their partners, are scored as 20 percent of the grant application.[125] One interviewee said the DOE decided on this strategy because there are many barriers to community engagement at the federal level. One DOE interviewee mentioned that DOE is working toward developing a community stakeholder-driven approach to environmental justice work. The Energy Efficiency Conservation Block Grants is an example of these community engagement strategies.[126] DOE has also created blueprints for these grants to help ensure that grant applicants create high-impact, equity-based projects, according to one interviewee. Although DOE has many community-led projects, community-driven work is difficult to execute in a replicable way, one interviewee said.

Identifying disadvantaged communities: By DOE's definition, disadvantaged communities have a cumulative burden from some combination of "fossil dependence, energy burden, environmental and climate hazards, and socio-economic vulnerabilities."[127] DOE uses a quantitative ranking system to locate DACs and maps these communities using the Disadvantaged Communities Reporter.[128]

Interagency collaboration: One interviewee explained that DOE has worked with the EPA and USDA to leverage their extensive capacity building experience, and another

124 Department of Energy, "Justice40 Initiative."

125 Department of Energy, "About Community Benefits Plans."

126 Department of Energy, "Energy Efficiency and Conservation Block Grant Program."

127 Department of Energy, "Justice40 Initiative."

128 Department of Energy, "Justice40 Initiative."

mentioned that the department is listening to community needs to determine what types of capacity building are needed. Additionally, one interviewee stated that the community benefits plans in competitive funding opportunities are still relatively abstract. An interviewee stated that memorandums of understanding have helped ensure that agencies meaningfully work together.

Ongoing program evaluation: One interviewee stated that multiple benefits are welcome and present in many programs, but there is the challenge of not imposing more reporting requirements on communities. SGC could work with DOE program staff to incorporate explicit prioritization of multi-benefit projects into grant guidelines.

Need for more capacity building: One interviewee noted that because the department has been a research and development organization for so long, there are few funds for community-level capacity building and technical assistance in their work. An interviewee mentioned that DOE is working to help communities navigate complex, siloed federal systems; we discussed this need further in our overarching findings and recommendations.

DEPARTMENT OF TRANSPORTATION (DOT)

Key Offices

- Justice40 Team
- Office of Project Development and Environmental Review
- Federal Transit Administration (FTA)
- Office of the Secretary of Transportation (OST)

Highlighted Programs

- Rebuilding America's Infrastructure with Sustainability and Equity
- Thriving Communities Program
- Transit-Oriented Development Planning Program

Themes

Overall Justice40 plan: The Department of Transportation has a clear, outlined strategy for achieving Justice40 goals.[129] It includes several strategies and goals for implementing Justice40 that align with SGC's mission: developing stronger evaluation mechanisms, including Justice40 in guidance and requirements, increasing technical assistance to disadvantaged communities, and building on equitable program design efforts.[130]

129 Department of Transportation, "Department of Transportation's Justice40 Fact Sheet."

130 Department of Transportation, "Department of Transportation's Justice40 Fact Sheet."

Identifying disadvantaged communities: DOT's definition of disadvantaged communities integrates transportation, health, environment, economic, resilience, and equity considerations.[131] As two interviewees mentioned that defining disadvantaged communities was a barrier to implementing Justice40; this definition will be key. DOT recently updated its Equitable Transportation Community Explorer, adding indicators to signal disadvantaged communities.[132]

Community engagement: DOT appears to use strong community engagement tactics. For example, it has published best practices for meaningful community engagement that demonstrate some alignment with SGC's practices.[133] One DOT interviewee expressed that DOT is looking for ways to better connect communities with funding opportunities to help communities successfully implement projects. With SGC's experience facilitating neighborhood-level community engagement planning, it may be well-positioned to support this growth.

Collaborative governance: One interviewee mentioned that it is challenging to find a community-based entity that is truly representative of a group. The public involvement best practices referenced above could provide a foundation for SGC to help the department develop and integrate a collaborative governance approach.

Technical assistance and capacity building: One interviewee mentioned a perceived need to develop a department-wide strategic approach to technical assistance. DOT outlines the goal of building trust and capacity in communities.[134] The fact that technical assistance and capacity building are expressed areas of growth for the agency presents an opportunity for SGC to advise and share ideas.

ENVIRONMENTAL PROTECTION AGENCY

Key Offices

- Office of Environmental Justice and External Civil Rights
- Office of Community Revitalization

Highlighted Programs

- Environmental and Climate Justice Block Grants
- Grant Competition for Community Monitoring
- State Tribal Assistance Grants

131 Department of Transportation, "Department of Transportation's Justice40 Fact Sheet."

132 Department of Transportation, "Justice40 Initiative."

133 Department of Transportation, "Promising Practices for Meaningful Public Involvement in Transportation Decision-Making."

134 Department of Transportation, "Promising Practices for Meaningful Public Involvement in Transportation Decision-Making."

Themes

Overall Justice40 plan: The Environmental Protection Agency has a robust environmental justice strategy that spans multiple programs and projects. In particular, the Office of Environmental Justice and External Civil Rights has several new programs that are relevant to SGC's work, many of which SGC could engage (as discussed in the Programs section below).

Capacity building: The EPA 2022–2026 Strategic Plan includes goals of increasing community capacity so that communities can share experiences with EPA and making contracting more equitable.[135] EPA community-based and regional work include projects like Growing Grassroots: Building Capacity for Environmental Justice Work in the Southeast which helps train community members and raise awareness of environmental health concerns.[136]

Technical assistance: EPA also has robust technical assistance programs for helping communities apply for grants, including webinars to increase awareness of federal grants and resource opportunities, technical assistance centers in communities (The Environmental Justice Thriving Communities Technical Assistance Centers), and grants tutorials (Environmental Justice Small Grants Program).[137] One EPA interviewee noted that the Agency is focused on environmental justice work, and specifically deepening this work by offering technical assistance to underserved and overburdened communities to further Justice40. These programs are in relatively early stages of development, and whether in the first round or later rounds, there is a broad opportunity for SGC to engage and share ideas.

Place-based: EPA follows the strategy of equitable development, a place-based method to meet the needs of underserved communities, to guide its work.[138] This method treats environmental justice as a planning issue and would be a key element of EPA environmental justice work for SGC to learn from. EPA has a seven-part Environmental Justice Collaborative Problem-Solving Model that centers community engagement in its methods.[139]

Interagency collaboration: EPA works collaboratively with several other federal agencies, and it is currently part of the White House Environmental Justice Interagency Council (IAC). One EPA interviewee mentioned that EPA works collaboratively with other agencies through interagency bodies such as the IAC, in addition to working directly with other agencies, as needed. This interviewee noted that there is always the opportunity to strengthen interagency collaboration, a potential area for SGC advising. EPA also provides environmental justice training to help state leaders incorporate environmental justice concerns in their decision making.[140] If SGC encourages overarching environmental justice training for federal agency staff, EPA's state training could be a helpful starting point.

135 Environmental Protection Agency, "Equity Action Plan."

136 Environmental Protection Agency, "Growing Grassroots."

137 Environmental Protection Agency, "Environmental Justice Grants, Funding and Technical Assistance."

138 Environmental Protection Agency, "Equitable Development and Environmental Justice."

139 Environmental Protection Agency, "EPA's Environmental Justice Collaborative Problem Solving Model."

140 Environmental Protection Agency, "EPA Launches Environmental Justice Training for States."

6. FINDINGS FROM INTERVIEWS AND SURVEYS

In addition to agency- and program-specific recommendations, we honed the insights from our interviews and survey down to a set of findings and recommendations that apply broadly across the agencies working toward Justice40 goals.

There is a disconnect in the government regarding the definitions of key terms used in federal programs.

Throughout the interviews, the difficulty of defining certain terms, such as a "disadvantaged community," often came up. Interviewees from nine agencies noted that "disadvantaged communities" and "equity" are nebulous concepts, which lead many agencies to define them differently.[141]

> **"It is difficult to draw lines around what counts as a disadvantaged community, there are lots of ways to assess what they are, especially when agencies have different thoughts [about what is considered a disadvantaged community] given their own purview."**
>
> —DEPARTMENT OF TRANSPORTATION INTERVIEWEE

> **"Three separate equity-centered Executive Orders use two different terms—underserved… and disadvantaged communities . . . As a result, federal agencies, including FEMA, are grappling with how to operationalize these two terms in a fair and consistent way."**
>
> —FEDERAL EMERGENCY MANAGEMENT AGENCY INTERVIEWEE

Different terms and definitions can impede interagency collaboration, and multiple interviewees discussed the need for more guidance.[142] Relatedly, we also found that some federal employees do not have a solid understanding of environmental justice principles. Interviewees from four agencies echoed this sentiment, expressing the need for federal government–wide training on the core tenets of environmental justice.[143] Additionally, interviewees identified a need for heightened awareness of climate change among federal staff and communities alike.[144] These knowledge gaps may need to be addressed for SGC to work effectively with some agency staff.

141 Interviewees from DOE, DOI, DOT, DRA, EPA, FEMA, HHS, HUD, USDA

142 Interviewees from DOE, DOI, DOT, HHS, HUD, USDA

143 Interviewees from EPA, FEMA, HUD, USDA

144 Interviewees from DOE, HHS, USDA

Some features of TCC were difficult for federal employees to distinguish between, which may create barriers for effective communication from SGC.

Semantics and specific definitions of terms presented communication challenges for many of our interviewees. Throughout the interview process, collaborative governance was repeatedly conflated with interagency coordination and collaboration. Of all the terms used, collaborative governance was most consistently difficult for interviewees to understand; many assumed the term meant collaboration among federal agencies or between federal agencies and state or local entities. In the TCC context, we define collaborative governance as formalized collaboration among representatives from multiple entities *local to a grant area,* such as public agencies, local organizations, and residents. These representatives collaborate on projects to ensure they fit community needs and TCC guidelines.

Interagency coordination and collaboration refers specifically to coordination and collaboration among different government agencies *at the state level* (or, in the case of federal agencies, at the federal level). Because of the conflation of the two features, some interviewees may have mistakenly said that their programs had collaborative governance-like features when in fact they were referring to interagency coordination and collaboration.

The difficulties experienced with implementing ongoing program evaluation create barriers to improving future federal programs.

All twenty-seven survey respondents claimed that program evaluation is relevant to their programs, reporting varying types and degrees of evaluation. However, there was a common theme throughout the interviews that collecting data from residents can be difficult and burdensome, and it can be challenging to measure benefits. Interviewees from five federal agencies voiced concerns about the lack of measures for tracking the benefits that are supposed to flow to communities.[145]

> **"How do we make sure that we're not unintentionally burdening those that we say we are trying to support?"**
>
> —DEPARTMENT OF TRANSPORTATION INTERVIEWEE

They noted that agencies lack the ability to assess progress in meeting Justice40 goals without standardized metrics for measuring benefits for disadvantaged communities. The procedures around measuring and evaluating benefits are still being developed, which makes it difficult for staff to begin tracking benefits. This could result in little to no tracking for current programs.[146] Additionally, there are difficulties tracking and measuring multiple benefits because agencies do not always have control over the flow of funding, and some grantee reporting may be unreliable.[147]

145 Interviewees from DOE, DOT, HHS, HUD, USDA

146 Interviewees from Denali, DOE, DOT, HHS

147 Interviewees from HHS and HUD

While there are many difficulties associated with meaningful program evaluation, federal employees want to improve their methods of evaluation. An interviewee informed us that several agencies are working together to develop a benefit measurement methodology for agencies to use to measure progress toward Justice40 goals.[148]

There is a need for consolidated and improved tools for identifying and targeting disadvantaged communities.

Employees from four agencies mentioned that data tools are helpful for defining, identifying, and targeting disadvantaged communities.[149] However, they caution against an overabundance of tools, and note that the tools need to be designed to thoroughly and equitably identify disadvantaged communities. Concerns regarding identifying disadvantaged communities may become less relevant as CEQ, OMB, and the Office of Climate Policy continue to expand guidance for federal agencies. For example, CEQ recently released a tool for identifying disadvantaged communities, called the Climate and Economic Justice Screening Tool (CEJST). Two interviewees mentioned that this tool is helpful;[150] however, two interviewees also expressed that there are limitations to the tool, citing its binary nature, as it does not rank or score communities according to how "disadvantaged" they are, which makes it difficult for agencies to prioritize communities.[151]

There are important differences between California's state requirements and the federal government's requirements when it comes to environmental justice and supporting disadvantaged communities.

An interviewee mentioned that the federal government is behind California in providing benefits to disadvantaged communities (DACs).[152] They stated that many federal agencies are providing the minimum level of benefits to DACs. Unlike in the case of TCC, which is codified in statute, there is no federal statute to enforce Justice40. Federal agencies can operationalize this executive order through the infrastructure bill programs that aid with implementation. However, three interviewees expressed that the lack of statutory authority and a fully developed organizational framework leads agencies to work less urgently toward Justice40 goals.[153]

Another difference brought up in an interview was that unlike TCC, which provides guaranteed funding over five-year periods, most federal programs provide short-term grants; even when a grant is more long-term, appropriations might not always come through. That potential loss of funding can limit or halt a program.[154]

148 Interviewee from HHS

149 Interviewees from DOE, FEMA, HUD, USDA

150 Interviewees from FEMA, USDA

151 Interviewees from FEMA

152 Interviewee from HHS

153 Interviewees from DOE, DOL, DOT

154 Interviewee from HHS

7. RECOMMENDATIONS FOR SGC

SGC can enhance communication with federal agencies by defining TCC features clearly and unambiguously—particularly collaborative governance. Federal agencies will benefit from more understandable definitions of the TCC features. As SGC encourages program staff to include collaborative governance structures, it will be helpful to have clear definitions and concrete examples of what that could mean for federal programs. Creating clear distinctions among features will improve federal agencies' ability to incorporate them into their existing and future programs.

There is an opportunity for SGC to support the development or improvement of one data tool for federal agencies to identify and prioritize disadvantaged communities. SGC can work with the White House (specifically, CEQ, OMB, and CPO) to create a single data tool that identifies disadvantaged communities in specific program areas and prioritizes those communities so the most underserved communities are supported first. There are other state and federal tools, like CEJST, that can serve as a starting point or model for this work.

SGC can support a more unified understanding of environmental justice tenets, including definitions of key terms used within Justice40 programs, by advocating for comprehensive training for federal employees. Federal employees working on Justice40-covered programs need unified definitions of environmental justice, disadvantaged community, and equity to ensure consistent use of language. More broadly, they would benefit from training in core tenets of environmental justice. SGC could consider engaging overarching federal offices (like CEQ, OMB, and CPO) to work toward more consistent definitions or advise training for employees across various federal agencies.

SGC should prioritize shared-learning opportunities with federal agencies and smaller equity-focused organizations in order to remove burdens from communities. By prioritizing shared learning or peer-to-peer learning with federal agencies and nonprofit organizations involved in TCC projects, SGC can better understand the barriers faced by communities and learn how to address those barriers.

In addition to the executive branch, SGC should consider engaging the legislative branch to utilize the power of Congress to incorporate TCC features into the statute governing programs, as well as to dedicate more funding for place-based, community-driven programs. While agency and program staff have significant ability to integrate TCC features and lessons into their work, in many ways, Congress has ultimate control over federal investments. To work toward programs that truly replicate the TCC model, SGC should consider engaging members of Congress to integrate TCC features into—and expand beyond—existing Justice40 covered programs.

8. CONCLUSION

The California Strategic Growth Council is working to support the implementation of the Justice40 initiative, advocating for place-based, community-driven programs to achieve more just investment outcomes. Through interviews and surveys of federal agency staff and examination of materials each agency has published, we have identified opportunities and a path forward for SGC to continue this work. While this is not the only way SGC can proceed, we have highlighted the agencies, programs, and overall opportunities where we see the most potential for shared learning between SGC and federal agencies.

Additional research and exploration of opportunities will help this engagement to succeed. For example, SGC may benefit from initial conversations with staff from the highlighted programs and key offices we identify for each of the top five agencies to gain more nuanced, detailed insight into the politics, finances, and challenges of each program. Overall, federal employees are open to creating more equitable practices within their agencies, and many are interested in learning more from SGC about how to improve their programs. SGC has a window of opportunity to enhance equity practices in the federal government through Justice40 and other future initiatives.

APPENDIX A. LIST OF INTERVIEWEE AGENCIES AND TABLE OF INTERVIEWS

We interviewed one to four employees from each of the following agencies:

- Appalachian Regional Commission
- Delta Regional Authority
- Denali Commission
- Department of Agriculture
- Department of Education
- Department of Energy
- Department of Health and Human Services
- Department of Homeland Security (FEMA)
- Department of Housing and Urban Development
- Department of Labor
- Department of the Interior
- Department of Transportation
- Environmental Protection Agency

The date, time, length, recording status, agency, and number of interviewees for each interview are included in the table below.

TABLE 5

Federal Employee Interview Information

#	Date and time	Length (min)	Recorded?	Agency	Number of interviewees
1	1/10/2023 11:00 AM	60	Recorded	Department of Agriculture	1
2	1/11/2023 11:00 AM	60	Recorded	Department of Agriculture	1
3	1/11/2023 12:00 PM	60	Recorded	Appalachian Regional Commission	1
4	1/12/2023 9:00 AM	60	Recorded	Department of Labor	2
5	1/12/2023 2:00 PM	30	Recorded	Department of Agriculture	1
6	1/13/2023 11:00 AM	30	Recorded	Department of Energy	2
7	1/17/2023 1:00 PM	60	Recorded	Department of Housing and Urban Development	1
8	1/19/2023 9:30 AM	60	Recorded	Department of Transportation	1
9	1/23/2023 1:00 PM	60	Recorded	Department of Energy	1
10	1/24/2023 11:00 AM	60	Recorded	Denali Commission	1
11	1/27/2023 1:00 PM	60	Recorded	Department of Health and Human Services	1
12	1/30/2023 12:30 PM	60	Recorded	Department of Energy	1
13	2/1/2023 10:00 AM	60	Not recorded	Department of Housing and Urban Development	1
14	2/2/2023 12:00 PM	60	Recorded	Department of Health and Human Services	1
15	2/8/2023 10:00 AM	30	Not recorded	Department of Transportation	1
16	2/13/2023 9:00 AM	60	Recorded	Department of Homeland Security (FEMA)	1
17	2/14/2023 10:00 AM	40	Recorded	Department of Transportation	1
18	2/15/2023 12:30 PM	30	Not recorded	Department of Education	2
19	2/16/2023 10:00 AM	60	Recorded	Department of Housing and Urban Development	1
20	2/17/2023 11:00 AM	60	Recorded	Department of Agriculture	1
21	2/22/2023 1:00 PM	45	Recorded	Delta Regional Authority	1
22	2/23/2023 12:00 PM	60	Recorded	Environmental Protection Agency	1
23	2/24/2023 11:00 AM	50	Recorded	Department of Health and Human Services	1
24	2/24/2023 1:00 PM	60	Recorded	Department of the Interior	1
25	Submitted 3/15/2023	N/A	Written responses submitted	Department of Homeland Security (FEMA)	1

APPENDIX B. METHODOLOGY CONTINUED

HOW WE INTERVIEWED SGC AND FEDERAL EMPLOYEES

Our initial interview with SGC staff was conducted, recorded, and transcribed using an online video conferencing platform, Zoom. We then used the transcript to inform the design of our federal employee interview guide. This interview was approximately sixty minutes.

For federal employee interviews, our aim was to include one to four participants from each of the sixteen agencies with Justice40-covered programs, so our analysis could be more comprehensive. The length of these interviews was approximately sixty minutes and consisted of roughly twenty-three questions. With participants' consent, the interviews were recorded and transcribed using Zoom; twenty-one of twenty-five interviews were recorded. A large enough proportion of interviewees preferred to remain anonymous that we chose not to report any interviewees' names.

LITERATURE

With the TCC program as the basis for our analysis of equity-focused programs within the Justice40/federal landscape, we did not use our literature review as a method for researching potential features or new or innovative approaches to equity-focused programming. Instead, we reviewed existing literature to learn about the tenets of community-driven and place-based climate investments and how they pertain to environmental justice and funding opportunities for communities. Our goal was to make a case for why these features are a solid jump-off point for agencies looking to make their work more closely aligned with TCC or more equity-focused in general and to address potential issues that the features of TCC may present. We know there are challenges and opportunities associated with any approach one can implement to improve equity, and no implementable feature we describe in this report is free of faults. We also know there is a reason these features have been implemented in TCC and are desirable for federal programs. We looked to the literature to find explanations for how and why these features can and should be implemented.

ADDITIONAL CRITERIA FOR SGC TO CONSIDER

Through our analysis, we identified several additional criteria that SGC should consider while engaging program staff.

- Would significant structural changes to the program require an act of Congress, or can the agency or office exercise discretion over program changes?
- Does the program have bipartisan support?
- Does the program have sufficient staff and funding to support the change?
- Is the program jeopardized by changes in administration?

We discussed many of these criteria in our interviews. In some cases, we learned helpful information about the politics and legal structures of the programs. However, for the program ranking, it was important to use data that we could collect uniformly for all programs and, for these factors, it would not have been possible for us to collect that level of data within the timeframe of the project. Therefore, we recommend that SGC consider each of these questions as a topic of future research for the target programs.

APPENDIX C. COMPLETE PROGRAM TIERS

Here, we present the Justice40-covered programs in the Target, Runner Up, and Some Potential tiers.

TABLE 6

Programs in the Target tier (alphabetical order)

Program	Agency
Appalachian Regional Commission Grants	ARC
Building Resilient Infrastructure and Communities (BRIC) Program	FEMA
Choice Neighborhoods	HUD
Communities Local Energy Action Program (LEAP)	DOE
Community Development Block Grant	HUD
Community Economic Development (CED)	HHS
EJ Office (Environmental and Climate Justice Block Grants)	EPA
Indian Community Development Block Grants	HUD
Land and Water Conservation Fund	DOI
Office of Community Revitalization	EPA
Rebuilding America's Infrastructure with Sustainability and Equity (RAISE)	DOT
Thriving Communities Program	DOT
Transit-Oriented Development (TOD) Planning Program	DOT
YouthBuild Program	DOL

TABLE 7

Programs in the Runner Up tier (alphabetical by agency)

Program	Agency
AmeriCorps NCCC	Americorps
AmeriCorps Seniors RSVP	Americorps
AmeriCorps State and National grants	Americorps
Denali Commission Grants	Denali
Clean Energy Demonstrations on Current and Former Mine Lands	DOE
Energy Efficiency and Conservation Block Grant Program (EECBG)	DOE
Energy Efficiency Revolving Loan Fund Capitalization Grant Program	DOE
Energy Improvement in Rural and Remote Areas	DOE
Indian Energy	DOE
New Solar Research & Development	DOE
Orphan Well Site Plugging, Remediation, and Restoration	DOE
Climate, Environmental and Cultural Resources	DOI
Community and Economic Development	DOI
Economic Development (TPA)	DOI
Education Information Technology	DOI
Employee Housing	DOI
Energy Community Revitalization Program	DOI
Forestry	DOI
Geospatial Services	DOI
Housing Improvement Program	DOI
Native American Affairs Program	DOI
Office of Trust Services - Natural Resources Management	DOI
Office of Trust Services - Operations of Indian Programs: Energy, Minerals and Mining Development	DOI
Operation of Indian Programs and Construction - Water and Power	DOI
School Facility Operations and Maintenance	DOI
The Alaska Native Science and Engineering Program	DOI
Tribal Climate Resilience - Adaptation Planning	DOI
Tribal Climate Resilience - Community Relocation	DOI
Water Recycling	DOI

Watershed Management Projects	DOI
America's Marine Highway Program	DOT
Congestion Relief Program	DOT
Disadvantaged Business Enterprise Supportive Services	DOT
National Infrastructure Project Assistance (MEGA)	DOT
On the Job Supportive Services	DOT
Reconnecting Communities Grant Program	DOT
Safe Streets & Roads for All	DOT
Transportation Alternatives (Surface Transportation Block Grant set-aside)	DOT
Delta Regional Authority Grants	DRA
Alaska Native Villages	EPA
Categorical Grant: Pollution Prevention (P2)	EPA
Categorical Grant: Tribal Air Quality Management	EPA
Children and Other Sensitive Populations: Agency Coordination	EPA
Environmental Education	EPA
Grant Competition for Community Monitoring	EPA
State Tribal Assistance Grants (STAG)	EPA
Technical Assistance for Treatment Works Program	EPA
Tribal General Assistance Program	EPA
US Mexico Border Program	EPA
Community Services Block Grant (CSBG)	HHS
Rural Community Economic Development Program (RCD)	HHS
HOME Investment Partnerships Program	HUD
Public Housing Health Hazards	HUD
Self-Help and Assisted Homeownership Opportunity Program (SHOP)	HUD
Agricultural Conservation Easement Program	USDA
Collaborative Forest Landscape Restoration Program	USDA
Community Facilities Direct Loan and Grant Program	USDA
Conservation Operations/ Conservation Technical Assistance (CTA)	USDA
Mutual and Self-Help Housing Grants	USDA
USDA Climate Hubs	USDA
Urban Waters	Several

TABLE 8

Programs in the Some Potential tier (alphabetical by agency)

Program	Agency
Tribal Partnership Program (Section 203 of WRDA 2000†)	DOD
Advanced Technology Vehicles Manufacturing Loan Program (ATVM)	DOE
Grants for Energy Efficiency and Renewable Energy Improvements at Public School Facilities	DOE
Hydrogen and Fuel Cell Technologies Office	DOE
Minority Education, Workforce Development, and Training (MEWT)	DOE
Preventing Outages and Enhancing the Resilience of the Electric Grid / Hazard Hardening	DOE
Solar Energy Technologies Office (National Community Solar Partnership)	DOE
Tribal Energy Loan Guarantee Program	DOE
Tribal Science, Technology, Engineering and Math (STEM) Grant Program	DOE
Weatherization Assistance Program	DOE
Wind Energy Tech Recycling Research & Development	DOE
Indian Water Rights Settlements	DOI
Land Acquisition Species	DOI
Missing and Murdered Indigenous Persons	DOI
Safety of Dams, Water Sanitation, And Other Facilities	DOI
Student Transportation	DOI
Tribal Irrigation and Power Systems	DOI
Tribal Water Rights Settlements	DOI
Youth and Volunteer Programs	DOI
Job Corps	DOL
Workforce Opportunities in Rural Communities (WORC) Grant Program	DOL
Charging & Fueling Infrastructure Grants	DOT
Innovative Coordinated Access and Mobility Pilot Program	DOT
Nationally Significant Federal Lands and Tribal Projects	DOT
Tribal Transportation Facility Bridges (Bridge Investment Program set-aside)	DOT
Tribal Transportation Facility Bridges (Bridge Replacement, Rehabilitation, Preservation, Protection and Construction set-aside)	DOT
Tribal Transportation Program	DOT
Brownfields Projects Program	EPA

Clean Water State Revolving Fund	EPA
Direct Awards to Air Agencies for Continuous Monitoring of PM2	EPA
Environmental Information	EPA
Sewer Overflow Control Grants Program	EPA
Water Infrastructure Improvements for the Nation Small and Underserved Communities Emerging Contaminants Grant Program	EPA
Housing Trust Fund	HUD
Native American Housing Block Grants	HUD
Native Hawaiian Housing Block Grants	HUD
Public Housing Fund	HUD
Rental Assistance Demonstration	HUD
Tenant-Based Rental Assistance (Housing Choice Vouchers)	HUD
Title VI Loan Guarantee Program	HUD
Abandoned Hard Rock Mine and Orphaned Oil and Gas Well Reclamation	USDA
Agricultural Management Assistance	USDA
Agriculture Risk Coverage Program	USDA
Climate-related Training	USDA
Conservation Reserve Enhancement Program	USDA
Conservation Stewardship Program	USDA
High Energy Cost Grant	USDA
Loan Guarantee and Multi-Family Programs for Underserved Communities	USDA
Multi-family Housing Section 521 Rental Assistance	USDA
Single Family Housing Direct Loans	USDA
Tribal Authorities	USDA

APPENDIX D. FINDINGS FOR NON-TARGET AGENCIES

APPALACHIAN REGIONAL COMMISSION

Appalachian Regional Commission (ARC) is a regionally-focused agency that funds place-based projects in the Appalachian region. ARC has a system of grants that aims to invest in projects that align with certain areas of investment, namely: workforce ecosystems, regional culture and tourism, community infrastructure, businesses, and leaders and local capacity.

ARC's congressionally appropriated funding is distributed primarily through its Area Development grants, as well as through various other initiatives and funding opportunities such as: the POWER Initiative, the INSPIRE initiative, the ARISE initiative, and through the READY Appalachia initiative. One of the agency's environment-related funding opportunities is the Solar Finance Fund, introduced in 2021 to finance the installation of solar panels across six states in central Appalachia.[1] This fund provides both grants and technical assistance to advance economic development through solar projects that face unique barriers in central Appalachia.[2] A recent concern of ARC is strengthening its grant performance measurement and all the elements within it, including performance evaluation.[3]

Highlighted Programs

- Appalachian Regional Commission Grants

Themes

Interagency coordination: One important aspect of ARC's funding efforts is interagency collaboration with various other federal agencies, which include EPA, USDA, and HUD, to jointly fund critical infrastructure projects that would otherwise be difficult to fund under a single agency. ARC also partakes in interagency working groups that aim to figure out which projects and or/regions these agencies can synergistically work.

Workforce development: This feature is prominent across ARC's granting programs and is part of the agency's strategic goals to strengthen community systems.[4]

Equity focus: ARC's strategic plan for 2022-2026 identifies the agency as an "equity

1 Appalachian Voices, "Building a New Appalachian Economy."

2 Appalachian Solar Finance Fund, "Strengthening Central Appalachian Economies with Solar Energy,"

3 Corianne Payton Scally and Anne N. Junod, "Final Report: Strengthening the Appalachian Regional Commission's Grant Performance Measurement"

4 Appalachian Regional Commission, "ARC's Investment Priorities for Appalachia."

driver that invests in and supports projects that aim to create a more equitable region."[5] The agency lists its one year and five year targets for funds directed toward benefiting economically distressed counties or areas as 50%.[6]

CORPORATION FOR NATIONAL AND COMMUNITY SERVICE (AMERICORPS)

AmeriCorps is the federal agency for national service and has five programs included in the Justice40 Initiative.[7,8] AmeriCorps has decades of experience in environmental stewardship and works closely with other federal agencies to engage over 16,000 members and AmeriCorps Seniors volunteers in projects that center conservation, renewable energy, and community resilience.[9,10]AmeriCorps focuses on six key areas: Economic Opportunity, Environmental Stewardship, Disaster Services, Healthy Futures, Education, and Veterans and Military Families.[11] While Americorps' Equity Action Plan is more focused on racial equity, the agency does enumerate climate goals in its strategic plan.[12] Objective 1.2 of the agency's strategic plan is to "reduce greenhouse gas emissions, conserve lands and waters, and adapt to the changing climate", while objective 1.4 is to "prioritize investment in the most underserved individuals and communities."[3] These enumerated aims are similar to TCC goals and the agency could benefit from SGC's guidance on how to best achieve them. In California, AmeriCorps ran a place-based grant opportunity in partnership with Stockton Service Corps in 2019, illustrating their emphasis in undertaking place-based work.[13]

Highlighted Programs

- AmeriCorps State Grants
- Americorps National Grants
- AmeriCorps National Civilian Community Corps

Themes

Community engagement: AmeriCorps has a strategy of using participatory research to engage individuals and communities to explore local issues and produce more impactful

5 Appalachian Regional Commission, "Appalachia Envisioned: A New Era of Opportunity: ARC Strategic Plan Fiscal Years 2022-2026."

6 Appalachian Regional Commission, "Appalachia Envisioned: A New Era of Opportunity: ARC Strategic Plan Fiscal Years 2022-2026."

7 AmeriCorps, "Region Offices."

8 AmeriCorps, "AmeriCorps Announces Programs to Join Biden-Harris Administration's Justice40 Initiative."

9 AmeriCorps, "Strategic Plan."

10 AmeriCorps, "Environmental Stewardship: Conservation and Climate Change."

11 AmeriCorps, "About: What We Do."

12 AmeriCorps, "AmeriCorps Equity Action Plan."

13 State of California, "AmeriCorps Place-Based Initiative Funding Opportunity—Stockton Service Corps."

and equitable solutions to these issues.[14] Adopting this alternative to top-down research allows for members of communities to be part of projects at every step of the process, amplifies their voices, and allows them to directly affect change.[15]

Targeting disadvantaged communities: AmeriCorps is prioritizing the provision of resources to underserved communities, with the reasoning that investment in these communities will make national service and volunteerism opportunities more accessible.[16]

DELTA REGIONAL AUTHORITY (DRA)

DRA was established in 2000 to promote economic development in the lower Mississippi River and Alabama Black Belt regions.[17] The enabling legislation for this agency dictates that at least 75% of DRA's funds must be invested in economically distressed counties.[18] DRA currently has 5 grant programs, according to our DRA interviewee, including the State Economic Development Assistance Program, Community Infrastructure Program, and Delta Workforce Project.[19]

Highlighted Programs

- Delta Regional Authority Grants (specifically, Community Infrastructure Fund, Local Development District Planning Pilot Project, and States' Economic Development Assistance Program)

Themes

Targeting disadvantaged communities: According to one interviewee, DRA targets all of its funding towards disadvantaged or distressed communities within its region. With the Justice40 Initiative, DRA has committed to advancing equity-centered design approaches in investments to make sure that underserved and environmentally-impacted communities can access new investment opportunities.[20]

Technical assistance and capacity building: DRA has technical assistance and capacity building in various programs, according to an interviewee, including the technical assistance component that is part of the Delta Workforce Grants the agency administers. According to the interviewee, a significant number of nonprofits, governmental entities, and others from across the region have been interested in accessing federal resources. SGC could assist DRA in making sure that technical assistance is robust for DRA programs.

14 Robles and Gouge, "Participatory Research: An Equitable Approach to Community Engagement."
15 Robles and Gouge, "Participatory Research: An Equitable Approach to Community Engagement."
16 AmeriCorps, "Strategic Plan."
17 Delta Regional Authority, "Justice40."
18 Delta Regional Authority, "About Delta Regional Authority."
19 Delta Regional Authority, "Justice40."
20 Delta Regional Authority, "Justice40."

Collaborative governance: DRA is experienced in collaborating with local, state, and federal leaders to make investments in projects that support transportation and public infrastructure, as well as workforce training and business development.[21] However, an interviewee stated that an increase in collaboration could be possible, as counties have previously expressed interest in assisting other distressed counties. DRA has requested to amend its statute to expressly identify tribes as an eligible entity.

DENALI COMMISSION (DENALI)

The Denali Commission was established by Congress in October 1998 and works to build infrastructure and create economic opportunity in one of the country's most underdeveloped regions, rural Alaska.[22] The Commission's mission is to provide and support job training and economic development services and has "a specific focus on promoting rural development."[23] According to one of our interviewees, this makes the commission a natural fit for Justice40, as a majority of their programs and funding are designed to assist environmentally threatened, economically distressed, or historically disadvantaged communities in Alaska. In addition, the commission has a climate planning program that helps communities with relocating, managing, and protecting in place in cases of massive erosion or flooding, according to our interviewee.

Highlighted Programs

- Denali Commission Grants

Themes

Targeting disadvantaged communities: Denali's work is place-based, as projects tend to be site-specific, especially the energy and climate adaptation projects, according to our interviewee.

Multi-benefit projects: According to an interviewee, the commission is always looking into leveraging multiple benefits from projects. In particular, the creation of facilities that serve multiple benefits is a priority. Being able to connect transportation infrastructure projects to an economic benefit (such as job creation) or a health and safety benefit, is something the commission prioritizes, as stated by an interviewee.

Interagency collaboration: The commission is working with other federal agencies whose work is relevant to Alaska's unique needs, such as FEMA, which has "specific statutory authorities related to disaster mitigation, response and recovery," according

21 Delta Regional Authority, "About Delta Regional Authority."

22 Denali Commission Alaska, "Partnering For a Better Alaska - Denali Commission Annual Report 2009."

23 Denali Commission, "About Us."

to the commission's strategic plan for 2018–2022.[24] One interviewee stated that the commission is part of a number of federal-level working groups and steering committees that have specific priorities which align with Alaskan needs, such as a community-driven working group that the Department of Interior has put together. The commission aims to complement, but not duplicate the efforts of other federal agencies, which is something SGC could assist them with.[25]

DEPARTMENT OF AGRICULTURE (USDA)

USDA has a strong focus on climate and equity, with several strategic goals that align with SGC's work. Their fifth strategic goal in particular shows alignment and relevance for SGC's engagement, calling for the department to "expand opportunities for economic development and improve quality of life in rural and tribal communities."[26] USDA Rural Development is the most promising office for SGC to engage.

Highlighted Programs

- Community Facilities Direct Loan and Grant Program
- USDA Climate Hubs
- Mutual and Self-Help Housing Grants

Themes

Interagency collaboration: An interviewee mentioned that USDA has a lot of interagency collaboration, particularly on the topic of climate. USDA Rural Development leads the Rural Partners Network, a major interagency program not covered by Justice40 that could be relevant for SGC to engage. Additionally, the office is part of the Interagency Working Group on Coal and Power Plant Communities and Economic Revitalization.[27] The strategic plan also mentions partnering with other agencies in several other capacities.

Prioritizing TCC features: USDA Rural Development prioritizes several TCC features in its funding and grant application processes. It has a category of funding for "Strategic Economic and Community Development," which prioritizes applications that include characteristics that appear similar to collaborative governance, leveraged funding, and program evaluation.[28] Additionally, the office assigns "priority points" to grant proposals that address environmental justice and other office goals. To some extent, this point system prioritizes proposals that include multi-benefit projects.[29] SGC could encourage the office to increase the degree to which TCC features receive priority points in this system.

24 Denali Commission Alaska, "Denali Commission Strategic Plan FY 2018–2022."
25 Denali Commission Alaska, "Denali Commission Strategic Plan FY 2018–2022."
26 U.S. Department of Agriculture, "Strategic Plan Fiscal Years 2022-2026."
27 U.S. Department of Agriculture, "Strategic Plan Fiscal Years 2022-2026."
28 USDA Rural Development, "Strategic Economic and Community Development."
29 USDA Rural Development, "Rural Development: Key Priorities."

Technical assistance and capacity building: Strategic goal 5.3 calls out capacity building and technical assistance as a goal to "increase capacity, sustainability, and economic vitality in rural and tribal communities."[30] Two interviewees provided examples of technical assistance in their programs. SGC could encourage offices to increase capacity building in programs, per this strategic goal.

Place-based: Place-based strategies are mentioned in multiple parts of the strategic plan, including in goal 5.3 and in the Rural Development priority point system. Accordingly, SGC could work with this office to identify opportunities for new place-based programs.

DEPARTMENT OF DEFENSE (DOD)

The Department of Defense has no programs in the Target or Runner Up tier, and we did not interview any staff from this department. The DOD Equity Action Plan Summary spans topics from artificial intelligence and technology regulation to integrating small-business participation. The most relevant plan mentioned is addressing environmental health issues resulting from defense actions, especially on Native American lands.[31] Based on the objectives outlined in this report, the Department of Defense is not a strong fit for SGC engagement.

DEPARTMENT OF LABOR

The Department of Labor has positively affirmed its commitment to advancing environmental justice through its "equitable investments in workforce development and training" in response to the President's Justice40 Initiative.[32] While the agency has a narrow focus on job creation and workforce development, it maintains a strong equity emphasis in its programs. This can be seen in its 2022-2026 Strategic Plan, which emphasizes the desire to address systemic inequities and serve workers in underserved communities.[33] This narrow focus presents an opportunity for SGC to help expand the impact of DOL environmental justice strategies. The agency has already sought feedback from stakeholders on how it could "improve services and better serve environmental justice communities."[34] The DOL 2022 Climate Adaptation Plan focuses on protecting workers from extreme climate events, grants to grow green job opportunities, and bolstering inter-departmental practices to further practice environmental stewardship.[35]

30 US Department of Agriculture, "Strategic Plan Fiscal Years 2022-2026."

31 Department of Defense, "Equity Action Plan Summary."

32 Department of Labor, Office of the Assistant Secretary for Policy. "Environmental Justice (EJ)."

33 Department of Labor, "FY 2022-2026 Strategic Plan."

34 Federal Register, "Request for Feedback under Executive Order 14008."

35 Department of Labor, "Climate Adaptation Plan."

Highlighted Programs

- YouthBuild Program
- Job Corps
- Workforce Opportunities in Rural Communities (WORC) Grant Program

Themes

Technical assistance: Technical assistance is a key component of programs under DOL and is an area where the agency has a lot of flexibility to establish what falls under the category, according to an interviewee. SGC could help DOL align its technical assistance more closely to the goals of Justice40, which is an aim mentioned by one interviewee.

Collaborative governance and interagency collaboration: The agency has interagency collaboration built into their strategic goals and, according to an interviewee, is strengthening this component through collaboration with other agencies, like HUD, that have areas in common.[36] In terms of collaborative governance, DOL requires grantees to establish partnerships and indirectly helps foster the kinds of relationships that facilitate collaborative governance, according to an interviewee, but this element could be strengthened with SGC's help.

Ongoing program evaluation: Previous program evaluation has informed DOL's work and helped them improve programs, especially Youthbuild, according to an interviewee. However, they are cautious to ask for increasing amounts of information from participants of programs, as they are aware this can be a burden to grantees.

DEPARTMENT OF STATE

The Department of State has only one Justice40 program and we did not interview any staff from this department. While the State Department and United States Agency for International Development's joint strategic plan for 2022-2026 mentions climate mitigation, these are on a national and international scale and not place-based.[37] As such, it is likely that SGC will not have much programmatic overlap with the State Department and we do not think this agency is a strong fit for SGC engagement.

DEPARTMENT OF THE INTERIOR (DOI)

The Department of the Interior has sixty-five programs and ten bureaus working with communities to advance environmental justice under the Justice40 Initiative.[38] While DOI supports a whole-of-government approach to environmental justice efforts, the Office of

36 Department of Labor, "FY 2022-2026 Strategic Plan."

37 Department of State and Agency for International Development, "Joint Strategic Plan FY 2022-2026."

38 Department of the Interior, "Advancing Environmental Justice."

Environmental Policy and Compliance guides DOI compliance with environmental justice requirements.[39] Some of the agency's more recent efforts to advance equity include making public lands and waters more accessible to all communities, cleaning legacy pollution from hazards like abandoned mines and oil and gas wells, and more broadly, fighting climate change.[40] Further, DOI is using geospatial analysis and toolkits to outline best practices for community engagement in developing local solutions.[41]

Highlighted Programs

- Land and Water Conservation Fund
- Energy Community Revitalization Program
- Community and Economic Development

Themes

Targeting disadvantaged communities: The agency's 2022 Climate Adaptation and Resilience Plan lists advancing climate equity as an ongoing priority, stating that DOI "continues to increase its understanding of how climate change impacts disadvantaged communities, how the benefits of its investments flow toward disadvantaged communities, and how those investments might be adjusted to achieve the goals of the Justice40 Initiative."[42] With SGC's help, DOI could better align its actions with these goals.

Interagency collaboration: DOI is part of an interagency working group that is working on regulations and permitting processes, and reforming hardrock mining laws to make energy sourcing more safe and sustainable, thus demonstrating the Department's commitment to a whole-of-government approach to addressing environmental hazards.[43] One interviewee pointed out that logistical challenges can impede collaboration, which is something that SGC could share knowledge on.

Community engagement: While DOI does not necessarily have community engagement plans, the 2022 DOI Equity Action Plan outlines the goal of engaging with organizations and people that are advancing equity to better ensure benefits flow to disadvantaged communities.[44] An interviewee pointed out that DOI does take community input and

39 Department of the Interior, Department of the Interior, Office of Environmental Policy and Compliance. "Environmental Justice."

40 Department of the Interior Office of Environmental Policy and Compliance, "Advancing Environmental Justice."

41 Department of the Interior, Department of the Interior, Office of Environmental Policy and Compliance. "Environmental Justice Training Resources."

42 Department of the Interior, "Climate Adaptation and Resilience Plan Progress Report."

43 Department of the Interior, "Interior Department launches Interagency Working Group on Mining Reform."

44 Department of the Interior, "Interior Department launches Interagency Working Group on Mining Reform."

feedback into consideration. There is potential for SGC to share knowledge that would help DOI implement some form of transformative planning centered around community engagement.

DEPARTMENT OF VETERANS AFFAIRS (VA)

The Department of Veterans Affairs has only one Justice40 program, Energy Efficient Mortgages. This program is for loans and does not appear to be place-based, which puts it outside of the scope of programs we focused on.[45] Based on this, the Department of Veterans Affairs is not a strong fit for SGC engagement.

FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA, WITHIN THE DEPARTMENT OF HOMELAND SECURITY)

The FEMA strategic plan and goals center equity, community, and climate resilience.[46] The plan calls for "transformational change" to integrate equity "across [FEMA's] programs," suggesting that the agency is open to making substantial changes to its programs.[47]

Highlighted Programs

- Building Resilient Infrastructure and Communities (BRIC) Program

Themes

Community-driven and community engagement: Within the agency's first strategic goal, it calls for "tailored solutions" to meet communities' needs after disasters.[48] The agency is implementing a "people first" approach and embedding FEMA staff in local and state partner entities to make programs and resources more accessible to communities.[49] One interviewee noted that there is not clear guidance on how to engage communities successfully without overwhelming communities through uncoordinated approaches from several agencies.

Capacity building and technical assistance: The strategic plan alludes to capacity building multiple times, calling for investments that "enable communities to directly address their own threats from climate change" and shifting to provide support that enables communities to increase their capacity for risk management and disaster

45 Energy Stars, "Energy Efficient Mortgages."

46 FEMA, "2022–2026 FEMA Strategic Plan," 8.

47 FEMA, "2022–2026 FEMA Strategic Plan," 9.

48 FEMA, "2022–2026 FEMA Strategic Plan," 9.

49 FEMA, "2022–2026 FEMA Strategic Plan," 11–12.

response.[50] As the agency expands this work, SGC could provide useful input to strengthen capacity building efforts.

Targeting disadvantaged communities: One interviewee noted that three Justice40-covered FEMA programs "modified their grant scoring criteria to prioritize funding to underserved and/or disadvantaged communities" for the first time in 2022, and that these programs will use the Climate and Economic Justice Screening Tool (CEJST) to identify these communities. When describing the agency's dedication to Justice40 goals, the interviewee said that "the work has just begun, but our agency's dedication to the effort is strong."[51]

Program evaluation: Program evaluation comes up repeatedly throughout the strategic plan. An interviewee notes that "FEMA is routinely evaluating its programs and policies to address barriers to them and eliminate disparities in outcomes."[52]

50 FEMA, "2022–2026 FEMA Strategic Plan," 17, 24.

51 Interviewee from FEMA

52 Interviewee from FEMA

APPENDIX E. FEDERAL EMPLOYEE INTERVIEW GUIDE

INTRODUCTION

Thanks for taking the time to speak with us today. I'm *name*, and this is *name* and *name*. We are all graduate students in the public policy department at UCLA. For our capstone policy project, we are working with the California Strategic Growth Council, known as SGC, which runs the Transformative Climate Communities program, known as TCC. We're exploring opportunities for federal agencies to incorporate elements of TCC into their programs to achieve Justice40 equity goals.

We'd like to record the interview so that we can focus on the interview rather than on taking notes. If you agree to be recorded, we will keep the recording and transcript in password-protected online databases that only our team can access. We will anonymize any interview data that we share with anyone else at UCLA or SGC. We will not publicly identify you by name or job title without your permission. Our final report may include anonymized quotations or paraphrased content from your interview. These quotations and paraphrased comments may be linked to your department or agency, but not your name or job title. Do you have any questions about this? Based on all this information, are you comfortable with this interview being recorded? *[either start recording or do not]*

To start, I'll give a quick overview of TCC, the program we're hoping can inform federal Justice40 work. TCC is a place-based grant program, which means that it provides state funding to neighborhood-scale project areas to fund projects specific to that neighborhood. It is also community-driven, which means that the projects the grants fund are largely designed by the communities they aim to help in order to fit that community's specific needs and wants. There are other components that help TCC to advance equity, which we'll go over throughout the interview. But to start, we'd like to start by learning more about what you do.

QUESTIONS ABOUT THEIR WORK AND JUSTICE40

1. Can you very briefly introduce yourself and your role?
2. Would you consider any programs you work on to be place-based and/or community-driven?
3. Do you work on programs that administer grants or prizes?
4. Is your office working toward Justice40 goals?
    - What progress has your team made toward Justice40 goals?
    - What challenges is your team facing in Justice40 work?
    - What guidance are you seeking, if any, to help you implement Justice40?
5. How much control or influence do you feel you have over the work your office or department does?

TCC QUESTIONS

Now, we would like to talk more about how elements of the Transformative Climate Communities program, or TCC, might be incorporated into your work.

6. We sent you a document with six different elements outlined: Collaborative governance, multi-benefit projects, transformative plans, technical assistance and capacity building, interagency coordination and collaboration, and ongoing program evaluation. Did you have a chance to read through that document? We will be going over each of the elements so feel free to pull it up now so you can reference it if needed.
    - [If yes] Great, thank you! Do you have any questions?
    - [if no] Ok, no problem. We can just give a brief definition of each element as we go.
7. We're going to go through these elements individually, but at first glance can you list any elements that stand out as particularly relevant or irrelevant to your work?

Now, we're going to go through the elements and discuss each one.

8. We'll start with collaborative governance. Collaborative governance is a structure where representatives from multiple local agencies, organizations, residents, and other entities participate in a collaborative and representative governance body to oversee planning and implementation. This enables programs to achieve more efficient, effective, and equitable outcomes than individual actors. Do the programs you work on include any form of collaborative governance?
    - [If yes] What does that look like in practice? What challenges does that face? How could that element improve? Which programs is this relevant for?
    - [If no] Do you think there are opportunities in your work to incorporate more of this element?
        - [If yes] What are the opportunities? What challenges do you anticipate facing in incorporating this?
        - [If no] What would get in the way? / Why is this not a good fit for your work?

9. The next element is multi-benefit projects. In practice, this means providing communities with flexibility to select projects proven to meet multiple objectives (such as emissions reductions and public health benefits). Do the programs you work on include multi-benefit projects?
    - [If yes] What does that look like in practice? What challenges does that face? How could that element improve? Which programs is this relevant for?
    - [If no] Do you think there are opportunities in your work to incorporate more of this element?
        - [If yes] What are the opportunities? What challenges do you anticipate facing in incorporating this?
        - [If no] What would get in the way? / Why is this not a good fit for your work?

10. The next element is what SGC calls "transformative plans" that are created by grantees. For TCC, all grantees must create and implement three plans: a community engagement plan, a displacement or gentrification avoidance plan, and a workforce development plan. These plans are core parts of the grants. Do the programs you work on include any form of planning that the grantee must do that is similar to these transformative plans?
    - [If yes] What does that look like in practice? What challenges does that face? How could that element improve? Which programs is this relevant for?
    - [If no] Do you think there are opportunities in your work to incorporate more of this element?
        - [If yes] What are the opportunities? What challenges do you anticipate facing in incorporating this?
        - [If no] What would get in the way? / Why is this not a good fit for your work?

11. The next element is technical assistance and capacity building. This means addressing resource gaps through targeted external support for technical grant activities, as well as support for communities to build internal capacity that will benefit them beyond the current grant. Do the programs you work on include technical assistance and/or capacity building?
    - [If yes] What does that look like in practice? What challenges does that face? How could that element improve? Which programs is this relevant for?
    - [If no] Do you think there are opportunities in your work to incorporate more of this element?
        - [If yes] What are the opportunities? What challenges do you anticipate facing in incorporating this?
        - [If no] What would get in the way? / Why is this not a good fit for your work?

12. The next element is interagency coordination and collaboration. Working across different federal government agencies may be helpful or necessary to coordinate activities and projects with multiple benefits. SGC is inherently an intergovernmental body, so it naturally works with a variety of state-level government agencies. Does your office tend to collaborate or coordinate much with other federal agencies or offices?
    - [If yes] What does that look like in practice? What challenges does that face? How could that element improve? Which programs is this relevant for?
    - [If no] Do you think there are opportunities in your work to incorporate more of this element?
        - [If yes] What are the opportunities? What challenges do you anticipate facing in incorporating this?
        - [If no] What would get in the way? / Why is this not a good fit for your work?

13. The final element is ongoing program evaluation, which includes monitoring projects and measuring success to inform future efforts, and to ensure transparency and accountability. Does your office generally evaluate your programs in an ongoing way?
    - [If yes] What does that look like in practice? What challenges does that face? How could that element improve? Which programs is this relevant for?
    - [If no] Do you think there are opportunities in your work to incorporate more of this element?
        - [If yes] What are the opportunities? What challenges do you anticipate facing in incorporating this?
        - [If no] What would get in the way? / Why is this not a good fit for your work?

ADDITIONAL QUESTIONS (TIME PERMITTING)

14. Do the people in your office seem to be supportive of Justice40 and open to new ways of working toward equity?
15. Do you have any other thoughts about Justice40 that you would like to share?
16. How can the benefits of working across sectors be best communicated to facilitate different federal government entities/agencies to work together?
17. How can programs be insulated from political changes/changes of administration at the executive level?
18. Have you seen community planning/place based elements in federal programs? How can this be best advocated for at the federal level?
19. TCC uses site visits and interviews to assess authentic community engagement. Is this a feasible strategy for the federal government? If not, what is feasible?

WRAP UP

20. Do you have suggestions of other people you think we should talk to? Could you provide their email addresses?
21. Are you willing to complete a survey for us in the coming weeks to follow up on this interview?
22. Are you comfortable being listed as an interviewee in our report?
23. Do you have any questions for us?

APPENDIX F. SURVEY QUESTIONS

QUESTIONS ABOUT IDENTIFYING INFORMATION

1. We will include a list of interviewees in our public-facing report and may quote from the interviews. Are you comfortable being identified or not? Please check the box next to each piece of information that you authorize us to include.
    - My name
    - My job title
    - None—please do not list or identify me in the report
    - Other (please specify)
2. Name, job title, email address, agency
3. Had you heard about TCC prior to communicating with our project team?

HOW DO ELEMENTS OF THE TRANSFORMATIVE CLIMATE COMMUNITIES (TCC) PROGRAM FIT INTO YOUR WORK?

4. How relevant is each of the following TCC elements to your organization? (i.e. Are they used in your organization's mission statement, objectives, or programs?) Please see the TCC elements above for more information.
    - Place-Based
    - Community-Driven
    - Collaborative Governance
    - Multi-Benefit Projects
    - Neighborhood-Scale Investments
    - Community Engagement Plan
    - Displacement Avoidance Plan
    - Workforce Development and Economic Opportunity Plan
    - Leveraged Funding
    - Targeting Disadvantaged Communities
    - Technical Assistance and Capacity Building
    - Building Trust in Government Entities
    - Ongoing Program Evaluation
    - Interagency Coordination and Collaboration
    - Planning Grants

DO YOU AGREE WITH THE FOLLOWING STATEMENTS?

ABOUT JUSTICE40

5. Justice40 is motivating environmental justice work in my department.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure
6. Federal employees in my department are supportive of Justice40.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure
7. Federal employees in my department are open to making changes to programs to achieve more equitable outcomes.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure
8. More funding to implement Justice40 would help my program or department.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure

ABOUT TCC

9. The programs or areas in which I work already incorporate the majority of the TCC elements.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure
10. There is significant potential to integrate elements of TCC into the programs that I work on (or other elements of my work).
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure
11. I am interested in learning from SGC about the successes and challenges of TCC to inform my work.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure
12. TCC lessons are particularly relevant at the federal level regardless of differences between the federal government and the State of California.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure
13. A lack of interagency coordination makes it difficult to implement TCC-like programs at the federal level.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure
14. There are not enough employees currently working in my department to easily implement programs with TCC elements.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure
15. Because my office focuses primarily on a specific area of work, it is difficult to implement projects with multiple benefits in a variety of sectors.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure

16. The elements of TCC are easy and feasible to implement into my department's programs.
    - Strongly agree / Somewhat agree / Somewhat disagree / Strongly disagree / Unsure

WHAT OTHER THOUGHTS AND FEEDBACK DO YOU HAVE TO SHARE?

17. Please list any programs at your agency that you think have similarities with TCC (i.e., place-based, community-driven programs), as well as programs that you think could potentially incorporate TCC elements
18. Do you have any other thoughts about Justice40 that you would like to share?
19. Do you have any other thoughts about TCC that you would like to share?
20. Do you have any other thoughts to share about this project?

APPENDIX G. SURVEY RESULTS

A few employees responded that they were not going to take the survey because of a lack of knowledge of Justice40 or feeling they were unqualified to take the survey. This hesitancy suggested that presenting the survey with less emphasis on Justice40 may have yielded more responses. Additionally, this demonstrates that there is a lack of understanding or awareness of Justice40. Another stated reason for not completing the survey was hesitation due to the agency's internal policies and procedures. The last reason cited was a mere lack of time or capacity to complete the survey.

Table 9 summarizes the number of responses per the multiple choice question. Each row should add to twenty-seven given there were twenty-seven respondents. However, some respondents chose not to select an answer for certain questions. It is important to note that technical assistance and capacity building are the most relevant features of TCC. The displacement avoidance plan, which is part of the transformative plans feature, was the least relevant, but still had thirteen respondents claiming they use it.

TABLE 9

Responses to the question, "How relevant is each of the following TCC elements to your organization?"

How relevant is each of the following TCC elements to your organization?						
	Relevant	Sometimes Used	Considered but not implemented	Never but would consider	Never and would NOT consider	Unknown
Place-based	18	6	0	1	0	2
Community-driven	18	6	1	1	0	1
Collaborative Governance	15	8	2	1	1	0
Multi-Benefit Projects	16	7	2	1	0	0
Neighborhood-Scale Investments	10	10	3	2	0	2
Community Engagement Plan	15	7	3	1	0	1
Displacement Avoidance Plan	5	8	5	4	0	5
Workforce Development and Economic Opportunity Plan	10	6	6	1	1	3
Leveraged Funding	14	7	2	2	0	2
Targeting Disadvantaged Communities	16	8	3	0	0	0
Technical Assistance and Capacity Building	20	5	0	1	0	1
Building Trust in Government Entities	15	8	3	1	0	0
Ongoing Program Evaluation	14	13	0	0	0	0
Interagency Coordination and Collaboration	17	10	0	0	0	0

An overarching finding from this survey question is the TCC features place-based and community-driven are not guaranteed to already be in use in Justice40 covered programs. In order to promote equity in federal level program investments, place-based and community-driven must be relevant and used in neighborhood-level programs. The majority of features are relevant, used, or have been considered. A common theme throughout our findings is the misunderstanding of collaborative governance. While only one respondent chose "never and would NOT consider", this is still evidence that there may be confusion associated with this feature that could be addressed by SGC so more federal programs can feel confident using collaborative governance.

Table 10, below, displays the findings from the survey question asking about our assumptions of Justice40 based on topics and recurring themes from the interviews. These assumptions were determined prior to analyzing the survey data. All the statements had a majority of respondents agreeing rather than disagreeing. However, the final statement, "More funding to implement Justice40 would help my program or department" had five respondents disagreeing. Based on the other assumptions displayed here, there may be a lack of interest to change or use Justice40 guidelines. Justice40 may not be the greatest motivator of environmental justice work. Thus, our findings from the survey and interviews suggest that there is not a one-size-fits all approach to creating equitable change in the federal government, which is not surprising or unknown.

TABLE 10

Summary of assumptions about Justice40 survey question

Assumptions about Justice40					
	Strongly agree	Somewhat agree	Somewhat disagree	Strongly disagree	Unsure
Justice40 is motivating environmental justice work in my department.	14	6	5	2	0
Federal employees in my department are supportive of Justice40.	13	10	2	1	1
Federal employees in my department are open to making changes to programs to achieve more equitable outcomes.	13	13	1	0	0
More funding to implement Justice40 would help my program or department.	14	6	5	0	2

Table 11 displays the findings from the survey question regarding our assumptions about TCC. The first row is confirmation of Table 10, above, on the features of TCC, twenty-five of the twenty-seven respondents agree that their programs incorporate

elements of TCC. This is an excellent starting point for SGC to begin conversations with these programs while simultaneously helping federal employees learn the tools needed to implement these features. Throughout these findings there is a general hesitation amongst respondents regarding their ability to use features of TCC. Many respondents agree that there are not enough employees working for their program to be able to implement these features as well as a potential misunderstanding of the importance of interagency coordination in federal equity work. Overall, federal employees will need more information and direct support from SGC to implement specific features of TCC into their existing or new programs.

TABLE 11

Summary of assumptions about TCC survey question

Assumptions about TCC					
	Strongly agree	Somewhat agree	Somewhat disagree	Strongly disagree	Unsure
The programs or areas in which I work already incorporate the majority of the TCC elements.	8	17	1	0	1
There is significant potential to integrate elements of TCC into the programs that I work on (or other elements of my work).	10	16	0	0	1
I am interested in learning from SGC about the successes and challenges of TCC to inform my work.	6	16	2	0	3
TCC lessons are particularly relevant at the federal level regardless of differences between the federal government and the State of California.	6	15	3	0	3
A lack of interagency coordination makes it difficult to implement TCC-like programs at the federal level.	3	11	9	2	2
There are not enough employees currently working in my department to easily implement programs with TCC elements.	9	12	3	1	2
Because my office focuses primarily on a specific area of work, it is difficult to implement projects with multiple benefits in a variety of sectors.	4	12	7	2	2
The elements of TCC are easy and feasible to implement into my department's programs.	1	15	8	0	3

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