



THE CLIMATE STRONG ISLANDS NETWORK

The Climate Strong Islands Network
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Mr. Bruce Binder
Senior Associate Director for Grants Competition
Office of Grants and Debarment/Office of Mission Support And
Mr. Matthew Tejada
Deputy Assistant Administrator for Environmental Justice Office of Environmental Justice and External
Civil Rights
Re: RFI for EPA-HQ-OEJECR-2023-0023 ECJ Program Design:

The Climate Strong Islands Network (CSIN) is an organization of U.S. island communities that raises awareness about the impacts of climate change on U.S. island communities and advocates for government policies that will support environmental, economic, and cultural resilience. Islands are among the first places impacted by climate change, with many U.S. island communities already feeling the threat of climate change in very real ways. CSIN is an organization of experts, available to provide input on policies that impact U.S. islands. It should be noted that many CSIN member organizations are recipients of EPA grants.

CSIN appreciates the new Environmental and Climate Justice (ECJ) program and the opportunities created by the Inflation Reduction Act funding to address longstanding Environmental and Climate Justice issues within historically disadvantaged communities. We value the ability to provide feedback on the ECJ program and encourage you to consider our comments when establishing best practices for the grants and technical assistance provided under this program. Below we discuss opportunities within the categories established by EPA to make this program more accessible to island communities and welcome to the opportunity to continue the conversation.

ECJ Program Design

CSIN has several suggestions to make the ECJ program more effective at engaging and supporting island communities. With adequate representation and a focus on the long-term sustainability of the ECJ program, grantee communities can be better supported by the agency.



CSIN recognizes the progress the agency has made by applying an environmental justice lens when selecting leaders for advisory committees and grant review panels, but also believes there is room for continued improvement. Additional efforts should be made to ensure advisory boards are more reflective of the communities they support. In our steering committee's experience, there is great variability between EPA's regions, where some are doing better than others at recognizing the challenges that Environmental Justice communities face and encourages the agency to keep making progress at all regional levels.

CSIN also recommends the agency make diverse representation standards in advisory committees and grant review panels so it is a consistent and sustained practice that is not subject to change from administration to administration. Great progress has been made, and we want to ensure that progress continues and is not rolled back by the next administration.

Reducing Application Barriers

CSIN believes additional support roles would benefit the ECJ program and its grantees. With adequate representation, reduced administrative burdens, and additional support, the program can better support grantee communities.

CSIN recommends removing financially burdensome conditions in the grant process, including financial matches and onerous grant reporting. For organizations with small operating budgets, match requirements make applying and receiving federal grants unattainable. We recommend removing match requirements to ensure smaller community organizations are able to apply for and receive federal funding. Additionally, grant applications and reports are a huge barrier for small organizations as they take many hours of work to manage and maintain. These administrative hours are often not included in grant budgets and are therefore uncompensated, a heavy financial burden for a small community organization. There needs to be a significant allowance for the administration of the grants.

CSIN suggests creating a new position or a few positions within the ECJ grant program to be a supportive advocate for grantees who can act as a liaison between the grantee and the grant administrator. Having



a real support person, not just a grant administrator, to act as a translator to help support and problem solve as a partner for small organizations, is imperative for success and increasing organizational capacity. Technical issues, questions, and concerns arise within SAM.gov and it is difficult to get resolution to these issues, even from the help desk. One member organization, for example, has experienced frustrating problems with SAM.gov. One month before the registration expired, the organization attempted to renew the registration as it had done annually for many years, however when the organization's grant manager logged into SAM as the administrator to complete the registration, she found that the administrator's account was no longer associated with the organization, an unexplainable disconnection had occurred. To remedy the issue, the organization reached out to multiple people for support, including the help desk through phone and live chat, and did what was recommended (submitting a notarized letter) but now they are in limbo, unsure if there has been communication between the SAM support specialists and their grant administrator, making them aware of this issue. Having a dedicated ECJ grant advocate and specialist would help remove the added stress and strain in these types of situations.

Grantees need continued communication, support, and proactive, rather than reactive, guidance. One central point person, instead of many who are seemingly disconnected, would be helpful. CSIN envisions a dedicated advocate that could help shepherd small community organizations through the grant process, especially when there are sensitive timelines associated with the grant would help reduce this burden. CSIN believes this position would help our member organizations and other similar organizations applying for EJC grants.

Reporting and Oversight

CSIN is both excited and encouraged to see additional EJC focused funding opportunities for small organizations and historically disadvantaged communities from the IRA and FY22 budget. This influx of funds, however, is challenging for small community organizations to manage due to organizational capacity. Historically, EJC funding was nonexistent or unavailable and small organizations lack the capacity to implement grants of this size and manage it immediately. To help with the long-term



sustainability of these grants, CSIN recommends the agency supports grantees with capacity building focused technical assistance and provides more allowance to build the capacity of the organization.

Like our recommendation above, CSIN suggests creating a new position or a few positions within the EJC grant program to be a supportive capacity building advocate. This position would be responsible for establishing expectations for the award and providing clear guidance for grantees. For example, we envision this position would host introductory training for grantees that might include the following topics: So you got an EPA EJC Grant, what now? What to expect from a large grant and what is expected of your organization? How many hours should your organization expect to dedicate to managing your grant? If you find yourself behind or have questions about your grant, here's what to do and who to call? And recommendations for keeping up with upcoming deadlines and reminders for key milestones.

We think this new position will help foster a more collaborative grant process that will help the agency achieve its goal of not being a top-down grantor and enable EPA staff to work with grantees to implement a strong project with meaningful impacts.

Technical Assistance

In addition to supporting grantees with capacity building, CSIN recommends endorsed mechanisms for the grant's eligible activities. For example, one organization was a recent recipient of an EJC grant that focused on air quality monitoring. This grant provides a historically disadvantaged community with the opportunity to engage residents in empowering citizen-science data collection. After hours of research and consultation with experts, including EPA officials, the grantee found reasonably priced and easy to use air quality monitors. However, EPA does not recognize the data collected by these particular monitors as actionable. If the EPA wants to empower communities to conduct monitoring activities, it will need to recognize the data that is collected by the community and by the equipment that a community can reasonably afford and deploy.

Types of Projects to Fund (Eligible project types)



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As a network of many small community-based organizations, CSIN members are constantly looking for grant opportunities. One of the biggest challenges our member organizations face is having to develop “new” programs when their existing, highly successful projects are underfunded. CSIN recommends the EJC EPA grant program considers funding existing programs instead of requiring grantees to come up with novel solutions. Many existing EJC programs, specifically, environmental education programs, have been engaging in EJC work, and deserve consistent funding.

Thank you for the opportunity to provide comments and for your consideration. CSIN looks forward to continuing to engage with the EPA to make grants and programming more accessible for island communities on the front lines of climate change.

Sincerely,

The Climate Strong Islands Network